



WELCOME

BENEFIT ISSUANCE,
MEAL COUNTING AND CLAIMING

KARI PERKINS
7/23/2019



Agenda

- Benefit Issuance
 - What, Why, Where and How
 - Updates & Saving
 - “Medium of Exchange”
 - Replacement
 - Denying/Delaying Meals
 - Outstanding Balances
- Meal Counting & Claiming
 - Point of Service Count
 - Acceptable/Unacceptable
 - Overt Identification
- Reports: Meal Count Edit Form
- Does your school have an acceptable Point-of-Service Meal Counting System?
- Questions



Benefit Issuance Document-What is it?

- A document which lists the benefit that a student receives in the NSLP/SBP; that benefit being a free or reduced-price meal.
- The benefit issuance document communicates the approved category (free or reduced-price) for each student.
- If preferred, the paid students can be listed.
- Other common names for benefit issuance document:
 - Roster
 - Meal Listing
 - Student Listing



Benefit Issuance Document-What is it?

- A benefit issuance document is based on:
 - Current Household Eligibility Application (HEA).
 - Direct Certification.
 - Homeless and Migrant liaison list.
 - Head Start/Even Start list.
 - Residential students in residential child care institutions (RCCIs), see the ISBE form:
 - http://www.isbe.net/nutrition/pdf/67-33_documentation.pdf
 - Or other state approved method.



Benefit Issuance Document-What is it?

- The benefit issuance process documents how students are claimed on a daily basis.
- The daily meal counts must be input into WINS by day and by site.
- These counts are captured on the meal count edit form.



Benefit Issuance Document MUST Contain:

- School Name
- Document Date
- Student's Last Name
- Student's First Name
- Category (Free & Reduced)
- Total numbers of F and R
- Transfer or Drop Dates



Benefit Issuance Document MUST Contain:

- Methods of Certification Free:

- Income-based
- Direct Certification
- SNAP/TANF
- Homeless
- Runaway
- Migrant
- If selected for verification



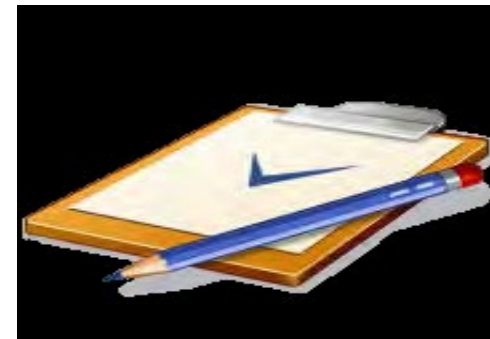
Benefit Issuance Document MUST Contain:

- Method of Certification Reduced:
 - Income-based
 - If selected for verification



Benefit Issuance Documents- Where do they come from?

- Listings can be *manually generated*.
- Listings can be generated from a *computerized Point of Sale system*.
 - Not all computer systems are the same.
 - Important to know what your system can and cannot do.





Example of a Manual Benefit Issuance Document:

School Name: Apple Elementary School

Date: December 30, 2018

Last Name	First Name	Category	Method of Certification	Drop Date
Andrews	Jenny	Reduced	Income	
Burd	Juliette	Free	SNAP/TANF	
Collins	Diana	Free	Income-Verified	
Dundon	Kat	Free	Income	
Edwards	Johnny	Free	Direct Cert	
Fafard	Talullah	Free	Homeless	
Grauer	Benny	Free	Runaway	
Hightower	Beth	Free	Migrant	12/10/18

Total Free: 7

Total Reduced: 1



Benefit Issuance: Direct Certification

- Direct Certification Listings will come directly from IWAS.

The screenshot shows the user interface of the Illinois State Board of Education's Electronic Direct Certification System. At the top, there is a navigation bar with the Illinois State Board of Education logo on the left, the text "Illinois State Board of Education" in the center, and links for "Direct Certification Home", "ISBE HOME", and "LOGOUT" on the right. Below the navigation bar, the user's ID "User Id: Kperkins18" and "RCDT:" are displayed. On the left side, there is a vertical menu with the following items: "Home", "Direct Certification", "SNAP/TANF/MEDICAID", "File Upload Match", "Single Child Match", "CEP Validation File Match", "Contact Us", and "Change RCDT". The main content area on the right contains the following text:

Welcome to the Illinois State Board of Education's Electronic Direct Certification System.

This system is used to certify a child to receive meal benefits for the USDA Child Nutrition Programs, based on information exchanged between other assistance programs without a household eligibility application completed by the household. LEAs participating in the National School Lunch Program are required to directly certify children for free meal benefits found in this system. If a child is directly certified for meal benefits, verification is not required. The local educational agency (LEA) agrees to follow all rules and regulations regarding the use of this data including confidentiality and disclosure as detailed in the School-Based Child Nutrition Programs Permanent Agreement.

Data sources currently being used for direct certification in Illinois includes:

- Supplemental Nutrition Assistance Program (SNAP),
- Temporary Assistance for Needy Families (TANF),
- Foster status,
- Income-Eligible Medicaid,
- Homeless,
- Migrant, and
- Head Start.

Please refer to the Electronic Direct Certification section of the [Administrative Handbook](#) for complete details.



Computerized Listings:

- NOTE ABOUT COMPUTERIZED LISTINGS-
 - Some computer systems allow ISBE direct certification downloads to be “dumped” into their system.
 - A computer-based benefit issuance database must contain the most current approved information.
 - Computer systems may contain more than one database of approved student statuses e.g. one at district level; one at site level.
 - Multiple sites & personnel entering student status information equals multiple room for ERROR, especially if databases at sites are different from the district database.
 - Systems with more than one database must be updated to reflect a student’s most current status.
 - Systems must be synchronized after each change in benefit issuance to avoid ERRORS in claiming.



Benefit Issuance Document- How Frequently Do I Update It?

- Benefit Issuance Documents must be updated:
 - When verification determines a change needs to be made.
 - Student transfer.
 - A household's decision not to receive a meal benefit.
 - Reported change in household size, income, receipt of new SNAP/TANF benefits by any member of the household that would INCREASE meal benefits.
 - New Direct Certification Listing. (annually, monthly, single child lookup)



Updating & Informing Households- Increase in Benefit:

- When a change occurs which **increases** the meal benefits (from reduced-price to free, from paid to free or paid to reduced-price):
 - The SFA must notify the household.
 - The SFA must change the benefit document within 3 operating days.
 - The SFA must ensure all students in household are updated at all sites.



Updating & Informing Households- Decrease in Benefit:

- When a change occurs which **decreases or terminates** the benefit (from free to reduced-price, free to denied/paid, reduced-price to paid) typically by verification results:
 - The SFA must notify the household.
 - The SFA must change the benefit document. However, in this case the SFA must provide the household ***ten-calendar days written advance notice***.
 - The first day of the ten-calendar days is the day the notice is sent.
 - A sample letter is located on the ISBE website.
 - The SFA must ensure all students in the household are updated at all sites.



Updating & Informing Households- Decrease in Benefit:

- If the meal benefits being received, based on categorical eligibility, **decrease** as a result of changes in a household's circumstances (e.g. increased income, loss of SNAP benefits, etc.), the change may not affect the meal benefits being received by the child due to the **year-long duration of eligibility**. Households experiencing changes in circumstances that would result in a decrease or termination of benefits do not have to be reported by the household. The SFA must explain to the affected household that the change in meal benefits is not required. A decrease in benefits will only go into effect if the household:
 - requests the change in writing, which could be done by submitting a new application.
- If meal benefits are decreased on a voluntary basis, the SFA must:
 - Notify the household immediately.
 - Change the eligibility status within 10 operating days.
 - Send written confirmation of the meal benefit changes.
 - Indicate that the change was made at the request of the household.
 - Give an explanation of the household's right to continue receiving meal benefits, if the household so chooses.



Do I save the LISTS?

- **ABSOLUTELY YES!!!**
- All listings must be saved for three years plus the current year.
- After each change occurs and a new listing is made this new list must take the place of the previous list.
- If you have a computerized system, often they do not save anything more than just the current information. Ensure that you can save the information from each dated listing.



Saving the LISTS and providing them to the sites:

- Once a list has been generated by computer or manually, the list or the information must be sent/communicated to sites.
- Ensure the new list is the latest list by putting the **current date** on it.
- Educate local site staff on the process so they will understand what list to use.



Saving the LISTS and providing them to the sites:

- Be consistent and ensure that all staff who deal with benefit issuance documents are all handling them the same way!
- That means to ensure the staff understands good recordkeeping.
- Above all: The lists are **CONFIDENTIAL**.
- Only appropriate staff should be given this information.



“Point of Service Counts” & “Mediums of Exchange”

- What is the POINT OF SERVICE COUNT?
 - The point at which it can be determined that a reimbursable meal has been served to an eligible child.
- What is a “MEDIUM of EXCHANGE”?
 - It is the way that benefit issuance is communicated, i.e. whatever is used to count a meal at the point of service, e.g. a child has a ticket and “exchanges” it for a reimbursable meal; a child has a P.I.N. number and inputs it in “exchange” for a reimbursable meal.



“Mediums of Exchange” when receiving a reimbursable meal at the Point of Service:

- Here are some examples of ways that students can receive the benefit assigned to them in order to receive a reimbursable meal:
 - Monthly Checklist (checklists are recommended only for schools with enrollment less than 100): an adult checks off the student’s name on the checklist.
 - Manually generated tickets: an adult makes a ticket for a child based on his eligibility then at meal time takes that ticket from a student.
 - Tokens: a type of token is taken.
 - Bar code cards: cards are scanned.
 - Pin codes (Personal Identification Numbers provided to students who then input them into a computerized pad).
 - Student Identification Cards: scanned by student or adult.
 - Biometrics: completed by student.



Counting and Claiming:

- Whether a ticket is taken, a checklist is used or a computerized count is used in the serving line, these “Mediums of Exchange” must be counted at the end of the line.
- Counting takes place and meals are then claimed in the appropriate categories.
- The meal counts can be documented eventually, on the Meal Count Edit form.



Replacement of “Mediums of Exchange”:

- Depending on the benefit issuance documentation chosen or “Medium of Exchange”:
 - Should a child lose or misplace a ticket, identification card, etc. the USDA has specific instructions (FNS Instruction 765-7, Revision 2) regarding lost, stolen or misused benefit issuance documents.



Replacement of “Mediums of Exchange”:

- The sponsor should develop its own written policies regarding such issues using this guidance and conform to the following standards:
 - Parents and students must be advised **in writing** of the district/school’s policy. It’s best to provide this at the time of application or approval time.
 - A minimum of 3 replacements or special meal arrangements must be allowed to each student during one school year if the student lost or had a ticket stolen.
 - This includes automated cards or identification cards.
 - If you charge for automated cards or identification cards the maximum charge recommended is the cost of a paid meal, unless an I.D. card has multiple uses.
 - The district/school must maintain a list of students who have reported missing original benefit issuance document(s) with the number of occurrences.



Denying, Delaying or Changing Meals as a Form of Discipline:

- The USDA has set regulations on the denial of meals and milk, delaying meal/milk service and changing of meal components as a form of discipline. Each area is discussed in the next slide.
- In doing so, there can be no discrimination against persons with disabilities or other protected groups.



Denying, Delaying or Changing Meals as a Form of Discipline:

- Denial of meals/milk as a disciplinary action is prohibited.
- Schools may delay meal/milk service.
 - Delaying meal/milk service as a disciplinary action may involve serving outside the normally designated period or serving in an unusual location, such as a classroom or detention area.
- Schools may not change meal components as a form of discipline.
 - The required 5 components must still be offered.



School District Policy on Outstanding FOOD SERVICE BALANCES

- Senate Bill 2428 (Public Act 100-1092)-Went into Effect 8/26/2018
 - Hunger-Free Students' Bill of Rights Act:
 - Provides that every school in this State shall provide a federally reimbursable meal or snack to a student of that school who requests the reimbursable meal or snack, regardless of whether the student has the ability to pay for the meal or snack or owes money for earlier meals or snacks.
 - Provides that if a student owes money for 5 or more lunches, a school shall reach out to the parent or guardian of the student to attempt collection of the owed money and to request that the parent or guardian enroll the student in a free or reduced-price lunch program.
 - Provides that a school may not publicly identify or stigmatize a student who cannot pay for a lunch or who owes money for lunches.
 - Provides that if the amount owed by a student for meals or snacks is owed and payable to a school district in an amount that is no less than \$500 and the school district has made reasonable efforts to collect the debt from the student's parent or guardian for at least one year, the school district may seek an offset under the State Comptroller Act. *(Working on administrative rules now!)*



School District Policy on Outstanding FOOD SERVICE BALANCES

- Written Local Meal Charge Policy (7/1/17)
 - School Districts are still required to have a policy.
 - Policies must adhere to USDA & State Agency Regulations.
 - Balances are set at the school district level and followed **consistently** at all sites in the district.
 - Written notice outlining the account balance, the school policy, and a date on which the adverse actions will go into effect should be **sent home**.
 - Recommended to set limits to a small amount e.g. \$10.00 or 4 meals as the maximum.
 - “Charging” refers to all forms of exchange, verbal or written.
 - Collection agencies may be used.
 - Ensure there is no overt identification taking place regarding this issue.



Counting and Claiming

- To receive reimbursement sites must accurately count, record and claim the number of meals actually served to students by category: free, reduced-price, and paid.
- The number of meals claimed must have adequate supporting documentation on file.





Elements of an Acceptable Counting & Claiming System:

1. ELIGIBILITY DOCUMENTATION:

- The SFA must have **documentation** to claim free or reduced-priced meals for reimbursement.
 - Documents can be:
 - Household Eligibility Applications
 - Direct Certification List
 - Homeless & Migrant Liaison List
 - Head Start/Even Start List
 - RCCI List



Acceptable Counting & Claiming System:

2. COLLECTION PROCEDURES:

- There must be steps in place for a “medium of exchange” which does not overtly identify students’ eligibility for free or reduced-price meals.
- Must prevent overt identification of students eligible for free and reduced-price meals.



Acceptable Counting & Claiming System:

3. POINT-OF-SERVICE COUNTS :

- As stated from previous slides, a point-of-service count is the point in the serving line where it can be determined that a reimbursable meal, containing all the correct components, has been served to an eligible child.
- It is not recommended that students take these counts.
- It is not recommended that students hand out tickets (in the classroom or in the cafeteria).



Acceptable Counting & Claiming System:

3. Point of Service Counts, continued:

- It is recommended that a **trained adult** take the point-of-service count.
- No matter where the meals are served on a field trip, or in a room other than the cafeteria, a point-of-service count **MUST BE TAKEN**.
- If a district or school has an “alternative” point-of-service counting method; this must be approved by ISBE Nutrition and Wellness Programs.



Acceptable Meal Count Systems:

- Coded tickets
- Bar-code/magnetic strip cards
- Coded identification cards
- Roster system/checklist
- Electronic systems
- Biometrics





A Note about Biometrics:

- Meal counting systems that use fingerprints, hand geometry, voice or facial recognition, or any other student biometric information is strictly enforced by the following:
 - Public Act 095-0232
 - See the Administrative Handbook Part H, page 7 for more information.





Unacceptable Meal Count Systems:

- Attendance, tray, delivery or entrée counts
- Morning counts
- Cash converted to meals
- Category/Cash back-out system
- Delivery counts (meals produced off-site)
- Counts taken anywhere other than at the point-of-service (e.g. beginning of line)
- An all cash line





Acceptable Counting & Claiming System:

4. CLAIM FOR REIMBURSEMENT:

- The monthly claim is submitted electronically by the SFA, by site, through IWAS/WINS.
- It is the responsibility of the authorized representative to ensure all policies and procedures, such as the Meal Count Edit and internal control (on-site visits) are implemented to ensure the claim is accurate and supported by documentation.



Overt Identification-How to Prevent it?

- The eligibility category of any child must be protected and known only by those school officials who deal directly with benefit issuance, counting and claiming.
- Codes on tickets, student IDs or rosters are one method of preventing overt identification.
- Codes must be difficult to recognize but not so confusing that the category is unidentifiable.
- Some codes are prohibited by the USDA:
 - The words “free”, “reduced”, “paid”
 - “F”, “R”, “P”
 - Single symbols such as A, B, C, 1, 2, 3 or AAA, BBB, CCC are not recommended.



Overt Identification-How to Prevent it?

- Recommended Codes:
 - By “series” such as a four or five digit series of numbers or letters or both, e.g. 1000-1999 for free; 2000-2999 for reduced; 3000-3999 for paid.
 - Student Identification Numbers used only by that student.
 - Codes by “variation”, such as varying the enrollment dates, e.g. 10/2/13=free; 10.2.13=reduced; 10-2-13 =paid.
- **The administrative handbook has other ideas for ways to prevent overt identification and ways to determine if you have an acceptable point-of-service count Section H, page 9 and 10.**



Reports: Meal Count Edit Form (not required)

- The number of reimbursable meals served daily, by category of eligible students are recorded and reported by personnel trained to observe and record reimbursable meals. The meal counts must be reported in a manner that can be easily read, edited and consolidated into an accurate monthly Claim of Reimbursement.
- The SFA must evaluate the meal counts for each site prior to submission of the claim for reimbursement.



Reports: Meal Count Edit Form (not required)

- Meal Count Edit Form may help an SFA identify and prevent errors in recording and consolidating meal counts:
 - The process compares the daily number of free, reduced-priced and paid meals claimed for each site to the following:
 - Highest number of eligibles by category
 - Attendance-adjusted eligibles for each category
 - The meal count edit form also compares the monthly number of free, reduced-price and paid lunches claimed for each site to the maximum number of meals allowable to the total number of meals claimed by category.



Does Your School Have an Acceptable Point-of-Service Meal Counting System?

1. Are claims based only on meal counts taken in the morning in the classroom or at any other location before the meal is served?
2. Are claims based on attendance?
3. Are meal counts based on the number of tickets sold and distributed or the number of meals paid for in advance?



Does Your School Have an Acceptable Point-of-Service Meal Counting System?

4. Is the number of free and reduced-price eligible students claimed, instead of the number of free and reduced-price meals actually served?

5. Are meal counts by category taken at the beginning of the serving line without checking that the meals served are reimbursable?

6. Are meal counts by category based on visual identification of students with no backup system available (e.g., checklists for persons not familiar with the students)?



Does Your School Have an Acceptable Point-of-Service Meal Counting System?

7. Are meal counts based on tray, plate, or entrée counts?
8. Are back-out systems that subtract a number from the total to get another number used?
9. Does the meal count system allow anyone other than required staff to know a student's eligibility category?
10. Is this a system that does NOT yield a reliable, accurate count of meals served by category?



Questions



THANK YOU!