

# *OSPI CNS School & Summer Meal Programs Reference Sheet*

## Hybrid Learning & Meal Distribution Models

Hybrid learning schedules may result in implementing a variety of meal distribution models to serve meals to children. This includes children who are on campus, off campus for remote learning, picking up meals, or having meals delivered through various transport means. Each distribution model has requirements to follow and processes to consider in order to maintain an accurate meal count system and prevent duplicate meals from being claimed.

### Requirements

- ✓ A Point of Service (POS) Meal Counting and Claiming System must be in place that **prevents duplicate meals** from being counted and claimed.
  - Point of Service: the point at which it can be accurately determined by an adult that a reimbursable meal has been served to an eligible child.
- ✓ If operating Summer Food Service Program (SFSP) open sites, all children must have **access to the same program meals**, regardless of whether they are enrolled in the district or not.
- ✓ If implementing the Non-Congregate Feeding Waiver, all enrolled students, virtual or in-person, must be offered the same program meals regardless of site type (closed enrolled vs. open).

### Point of Service Meal Count Considerations

At sites where children are served meals on campus and where meals are also available for the community/parents to pick up for children not enrolled in school, a “by-name” meal count system may be necessary to ensure program integrity. A “by-name” meal count system provides certainty that your meal count system prevents duplicate meals from being served, counted, or claimed at the various meal distribution locations. These methods include:

- ✓ Pre-Order System
  - Consult with IT department to determine capabilities
- ✓ Electronic/Automated System
- ✓ By-Name Student Rosters
- ✓ By-Name Student Roster System with use of alternative identifiers
  - Associated Student Body (ASB) cards
  - Meal Card



## Procedures and Program Integrity

- ✓ Develop procedures for each type of meal counting and claiming.
  - Include edit checks and monitoring for duplicate meals.
  - Communicate procedures with staff.
    - If staff outside of food service distribute meals and take point of service meal counts, they must be trained on the procedure.
- ✓ To further protect POS program integrity and to prevent duplicate meal service, incorporate the following:
  - Community messaging via district web site and social media portals.
    - Let households know that only two meals are available to each child each day, per U.S. Department of Agriculture (USDA) guidance.
    - Children receiving meals while at school cannot pick up meals for the same day from a community meal service location.
  - Frequent Meal Count “Edit Checks” to assess meal counts at all sites and to investigate meal count systems if meal counts are higher than normal.

## Best Practices

- ✓ **Community Meals**
  - When meals are picked up a SFSP meal tally form can be used in combination with the “by-name” list of children already served a meal on campus.
  - Require parents/guardians to attest that duplicate meals are not being pick up at the POS.
- ✓ **Meal Delivery to “Sites”**
  - LEAs may coordinate meal delivery to “sites” such as childcare centers, community sites, or school sites.
  - Coordination between the LEA and sites must be a formal arrangement where the site is set up as an official site in WINS under the LEA, or the site is set up as a “stop” on a meal service delivery route.
  - When meals are dropped off at sites, the site staff must take a point of service meal count
  - Meal counts must be submitted to the LEA and retained as the source document
  - The school district will claim these meals for reimbursement, not the site.
  - Staff training and routine onsite monitoring are essential to ensure accuracy
- ✓ **Meal Delivery to “Stops”**
  - Meals are served to children or a parent/guardian at stops along a delivery route.
  - Per USDA Parent Pick Up Waiver, the child does not need to be present for meal service.
  - Require parents/guardians to attest they are not picking up duplicate meals at the POS.
  - A “by-name” meal count and/or meal tally form may be used to record meal counts.

✓ **Meal Delivery to Homes**

- Written parental consent must be obtained prior to delivering meals to a child's home.
- The child or parent does not need to be present to receive the meal per USDA guidance.
- POS meal counts are taken as each meal is delivered to each residence.

✓ **Site Operation**

- Closed enrolled sites
  - Meal service is provided to enrolled children only – meals are not made available to the public
  - For on campus meal service, an electronic/automated meal count system or by-name roster can be used to count meals for enrolled students.
- Open Sites
  - Distribute meals to remote learners and community children simultaneously with the closed enrolled sites.
  - Limit meal pick up to specific days/times.

## Resources

- ✓ [Point of Service Meal Counting Reference Sheet](#)
- ✓ [SP 13-2020, CACFP 07-2020, SFSP 06-2020 Q8](#)
- ✓ [SP 25-2020, CACFP 14-2020, SFSP 14-2020 Q11](#)
- ✓ [CFR 210.8 \(a\) Internal Controls](#)

## Acronym Reference

- ASB - Associated Student Body
- CNS - Child Nutrition Services
- LEA – Local Education Agency
- OSPI - Office of Superintendent of Public Instruction
- POS – Point of Service
- SFSP - Summer Food Service Program
- USDA - United States Department of Agriculture