SCHOOL NUTRITION PROGRAMS ADMINISTRATIVE HANDBOOK

SCHOOL YEAR 2017–18

Alaska Department of Education
and Early Development

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Overview of Child Nutrition Programs

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Commonly Used Acronyms

AR	Administrative Review
AKCNP	Alaska Child Nutrition Programs
ASSP	After School Snack Program
CACFP	Child and Adult Care Food Program
CEP	Community Eligibility Provision
CNP	Child Nutrition Programs
CNP Web	Child Nutrition Programs Web-based Claiming System
DC	Direct Certification
DEED	Alaska Department of Education and Early Development
DoD	Department of Defense
FFVP	Fresh Fruit and Vegetable Program
FDPIR	Food Distribution Program on Indian Reservations
FNS	Food and Nutrition Service, USDA
FSMC	Food Service Management Company
FY	Fiscal Year—October 1 through September 30
HHFKA	Healthy, Hunger Free Kids Act
HACCP	Hazard Analysis and Critical Control Point
HUSSC	HealthierUS School Challenge
ICN	Institute of Child Nutrition (Formerly NFSMI)
ISP	Identified Student Percentage
LEA	Local Educational Agency
NSBW	National School Breakfast Week
NSLP	National School Lunch Program
NSLW	National School Lunch Week
OSHCC	Outside School Hours Care Centers
OVS	Offer versus Serve
PLE	Paid Lunch Equity
PY	Program Year—July 1 through June 30
RA	Recipient Agency (a recipients of USDA Foods, may be a school or child care)
RCCI	Residential Child Care Institution
RFP	Request for Proposal
SA	State Agency
SBP	School Breakfast Program
SFA	School Food Authority
SFSP	Summer Food Service Program
SNA	School Nutrition Association
SNAP	Supplemental Nutrition Assistance Program
SNP	School Nutrition Programs
SMP	Special Milk Program
SRM	State Records Management
SSO	Seamless Summer Option
SY	School Year—July 1 through June 30
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
VCSR	Verification Collection Summary Report

Contact Information

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Program Manager
907-465-8708

Grants Manager
907-465-2860

NSLP Coordinator
907-465-8709

USDA Foods Coordinator
907-465-8710

CACFP Coordinator
907-465-8711

Specialist, School Initiatives/FFVP
907-465-8719

Specialist, Summer Food/At-Risk Meals
907-465-4788

NSLP Assistant
907-465-3316

CACFP/Summer Assistant
907-465-4969

Websites

Alaska Child Nutrition Programs
https://education.alaska.gov/TLS/CNP/

USDA/FNS

Programmatic
http://www.fns.usda.gov/fns/nutrition.htm

Team Nutrition
http://www.fns.usda.gov/team-nutrition

2010 USDA Dietary Guidelines for Americans
http://www.cnpp.usda.gov/DGAs2010-PolicyDocument.htm

Institute of Child Nutrition
(Formerly National Food Service Management Institute)
http://www.nfsmi.org

Action for Healthy Kids (AFHK)
http://www.actionforhealthykids.org

Alaska School Nutrition Association (AKSNA)
http://www.aksna.org/

School Nutrition Association (SNA)
http://www.schoolnutrition.org

Program Bulletin

A program bulletin is produced monthly and provides updates, training information, and other useful tips and resources to school nutrition program staff. Archived copies of the newsletters are available at https://education.alaska.gov/TLS/CNP/NSLP9.html.

The Authorized Representatives and Contact Persons listed in the CNP Web sponsor sheet will receive notice of the bulletins by email each month and are expected to share with all interested parties.

Timeline for School Nutrition Programs

Daily	Complete production records Complete point of service meal counts
Monthly	Read the program bulletin. Obtain and process monthly **Direct Certification** student data (after email notification from CNP received) Complete Edit Check Worksheet.
July	Submit JUNE **Claim for Reimbursement** (if applicable). **NSLP Annual Renewal** process begins July 1 Renewal checklist and instructions available on State Webpage.
August	Submit JULY Claim for Reimbursement (if applicable). Process **Household Eligibility Applications**—within ten days of receipt.
September	Submit AUGUST **Claim for Reimbursement** (if applicable). Continue processing **Household Eligibility Applications** **NSLP Annual Renewal** deadline—September 15 Conduct first **Afterschool Snack Review** within four (4) weeks of program start date. Second review due before end of program year.
October	Submit SEPTEMBER **Claim for Reimbursement** (if applicable). Begin the household application verification process: • October 1—**Approved Application Count (Free, Reduced & Error Prone)**—pull 3 percent of total approved applications from error prone category to verify. • Last Operating Day of October Student Count Begin **On-Site Counting & Claiming Reviews** (required for multi-site sponsors); to be completed and submitted by February 1. SRM October 1—**Mandatory for All Districts**
November	Submit OCTOBER **Claim for Reimbursement** (if applicable). Verification of **Household Application** process must be completed by November 15th Continue **On-Site Counting & Claiming Reviews** of all feeding sites.
December	Submit NOVEMBER **Claim for Reimbursement** (if applicable). Continue On-Site Counting & Claiming Reviews of all feeding sites.
January	Submit DECEMBER **Claim for Reimbursement** (if applicable). Continue **On-Site Counting & Claiming Reviews** of all feeding sites. If meal services contract is scheduled to expire, begin preparing your bid solicitation/contract documents for submission to the SA.
February	Submit JANUARY **Claim for Reimbursement** (if applicable). Feb 1—Deadline for submitting **On-Site Counting & Claiming Review Summary Report** Feb 15—Deadline for submitting **Verification Summary Report** Submit Intent to Renew with FSMC (if applicable)
March	Submit FEBRUARY **Claim for Reimbursement** (if applicable).
April	SRM Enrollment as of April 1, **mandatory for all districts**, and pull **Direct Certification Identified Student** information by April 1 for CEP applications Submit MARCH **Claim for Reimbursement** (if applicable). **Paid Lunch Equity** (PLE) Notice due by April 30.
May	Submit APRIL **Claim for Reimbursement** (if applicable). Submit **Food Safety Inspection Summary Report** by last day of school or June 1 (whichever comes first). Submit **Afterschool Snack Review Summary Sheet** by last day of school or June 1 (whichever comes first).
June	Submit MAY **Claim for Reimbursement** (if applicable). Submit CEP application or reapplication (if applicable).

Program Participation

The Child Nutrition Programs are federally funded and administered by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS). At the state level, the Child Nutrition Programs at the Alaska Department of Education and Early Development is the administering agency working with various schools, community organizations, child care centers, day care homes, and other sponsoring organizations to provide adequate nutritious meals, snacks, and/or milk for children. Reimbursement is paid to sponsoring organizations based on the number of reimbursable meals or milk served to eligible children.

Each Child Nutrition Program is operated under a separate set of regulations, monitoring standards, and record keeping requirements. This section of the handbook will provide you with general information about all of the available programs.

Participating sponsors must agree to operate programs according to the following regulations:

- Serve meals that meet federal requirements
- Operate a nonprofit food service program
- Offer free, reduced-price and paid meals to eligible children based on household eligibility
- Do not identify nor discriminate against any eligible child
- Operate food service for all students without regard to race, color, national origin, sex, age, or disability

A variety of Child Nutrition Programs are available to public and private non-profit schools, residential child care institutions (RCCIs), day care homes, child care centers, and camps that serve children in grades 12 and below.

School Nutrition Programs

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Special Milk Program (SMP)
- After-School Snack Program
- Fresh Fruit and Vegetable Program (FFVP) Grant
- Department of Defense (DoD) Fresh Fruit and Vegetable Program

Child and Adult Care Food Program

- Day care homes
- Child care centers
- At-Risk Meals

Summer Meal Programs

- Summer Food Service Program (SFSP)
- Seamless Summer Option (SSO)

USDA Foods

- Available for schools, child and adult care centers, and summer food service programs.

National School Lunch and Breakfast Program

The National School Lunch Program (NSLP) and School Breakfast Program (SBP) are federally assisted meal programs established under the National School Lunch Act that provides nutritionally balanced, low-cost or free breakfast and lunches to students each school day. It is administered at the federal level by the USDA and at the state level by CNP.

Who Can Participate in the NSLP and SBP?

- Public Schools
- Non-Public Schools that are non-profit and registered with the DEED.
- Residential Child Care Institutions (RCCIs)

Program Requirements

Nutritional Requirements

School meals must meet meal requirements specific to the age/grade grouping being served. Please visit https://education.alaska.gov/TLS/CNP/pdf/mealpattern.pdf for detailed information.

Service Requirements

The reimbursable meal must be priced as a unit and available to all children regardless of their ability to pay. Meal service for lunch must be served between the hours of 10 a.m. and 2 p.m. with sufficient time for the meal to be served and eaten. Breakfast meal must meet the meal requirements, and served to children at or close to the beginning of the child's day at school.

Additional Requirements

Local education agencies (LEAs) participating in the SBP and/or NSLP are required to develop a local school wellness policy, with the objectives of improving the school nutrition environment, promoting student health, and reducing childhood obesity.

Eligible Children

All children enrolled at a participating site may receive a meal through the SBP and/or NSLP. Children from families with incomes at or below 130 percent of the poverty level are eligible for free meals. Those with incomes between 130 and 185 percent of the poverty level are eligible for reduced-price meals, for which students can be charged no more than 30 cents for breakfast and 40 cents for lunch. Meals are also available at the paid price for all children who do not qualify for free or reduced-price meals.

Children may also be automatically eligible for free meals or free milk if they, or any household member, receives benefits under Assistance Programs; or if they are designated as members of Other Source Categorically Eligible Programs. There are two ways children may be classified as categorically eligible:

1. **Participation in Assistance Programs:** A child or any member of the household receives benefits from SNAP, FDPIR, or TANF, as determined either through direct certification or an application with the appropriate case number; or
2. **Other Source Categorically Eligible designation:** A child is documented as meeting the applicable definition, as defined in this section, as:
   - Homeless, runaway, or migrant;
   - A foster child; or
   - Enrolled in a federally-funded Head Start or comparable State-funded Head Start or pre-kindergarten program.

Menu Planning

The USDA requires specific food components to be served in required amounts based on the age/grade group being served. The required components for breakfast include: fluid milk, grains, and fruits. The required components for lunch include: fluid milk, grains, meat/meat alternates, fruits, and vegetables.

Rates of Reimbursement

NSLP

Sponsors that choose to participate in the NSLP receive cash subsidies and donated USDA Foods for each meal served through the State agency. Lunches served must meet federal requirements, and free and reduced-price lunches must be offered to all eligible children. The site is reimbursed for each reimbursable meal served to an eligible child. Reimbursement will not be provided when children take only a portion of the meal, such as just the milk. Reimbursement rates are applied based on the child's eligibility: paid, reduced-price, or free. The site is responsible for accurately counting meals served to children daily by eligibility category.

The National School Lunch Act provides two different payment levels for lunches served under the NSLP. This is automatically calculated by the state agency for each SFA.

- **Less than 60 percent payment level:** This reimbursement level is used if less than 60 percent of the lunches served by an SFA in the school lunch program during the second preceding school year were served free or at a reduced price.
- **Sixty percent or more payment level:** This reimbursement level applies to lunches if 60 percent or more of the lunches served by an SFA during the second preceding school year were served free or at a reduced price.

School Breakfast Program (SBP)

Schools set their own prices for breakfast served to students who pay full price (though they must operate their meal services as non-profit programs). No government-donated food entitlement will be offered for breakfasts served; however, government-donated foods received for lunch may be used for breakfast.

Severe Need Reimbursement

An SFA may be eligible for a higher rate of reimbursement for breakfasts served to eligible children in the current school year based on USDA criteria for severe need. Severe need reimbursement is for sites serving breakfast to a large percentage of low-income students. To be eligible for Severe Need Breakfast reimbursement, a site must meet the following criteria:

- Forty percent or more of the lunches claimed at the site in the second preceding school year were served free or at a reduced price
- The site is participating in or initiating a School Breakfast Program

Sponsors automatically receive the higher rate of reimbursement for each eligible site. Eligibility is shown on the Site Application that is completed annually. Additionally the SFA must maintain documentation of all costs associated with the School Breakfast Program. Funds reimbursed for severe need may only be expended in those sites approved for additional funding.

Visit the CNP website for current **Reimbursement Rates.**

Record Keeping

At a minimum, SFAs must maintain the following records for three years plus the current or longer if a review remains open:

- Documentation showing student eligibility for free or reduced price meals: Household applications; direct certification list; categorical eligibility listing.
- Meal counting and claiming documentation.
- Documentation of individual child's attendance on a daily basis.
- Menu, recipes, and production records related to the service of a reimbursable meal.

Special Milk Program

The purpose of the Special Milk Program (SMP) is to encourage the consumption of fluid milk by students.

Eligible Participants

The **Special Milk Program** provides reimbursement to participants that offer fluid milk to children that do not have the option to participate in any other federally supported Child Nutrition Programs such as the NSLP and the SBP.

Enrolled children may participate in the **Special Milk Program** if they:

- Attend school
- Attend a child care institution and are under 19 years of age
- Attend split-session kindergarten classes or vocational program and are not present during federally supported breakfast or lunch service with access to milk
- Attend a camp

Sponsor Responsibilities

Sponsors must ensure:

- The same types of fluid milk are made available to everyone.
- Only 1% and skim **unflavored**, OR **skim flavored** milk can be offered. (Unless there is a Medical Statement on file)
- Claims are made in terms of the number of half-pints served.
- The program is operated as a non-profit milk service.
- Revenue is used only for the operation or improvement of milk services.

Program Options

1. **Pricing Option—paid milk only**

   Household Eligibility Applications are not required. Students can be charged up to the difference between the program cost (milk + administration) and current reimbursement rate. However, the program must run as a non-profit program. For instance, if milk costs 25 cents and administration is 5 cents then each of the students would pay 12 cents (30 cents—18.25 cents or the current reimbursement rate).

2. **Non-Pricing Option—paid milk only**

   Household Eligibility Applications are not required. It is like the Paid Milk Option in that students can be charged up to the difference between the program cost and current reimbursement rate; however, the milk is not "priced" per sale. The students pay a lump sum, such as on a weekly, monthly or annual basis, perhaps included as part of tuition.

3. **Pricing Option—with free milk**

   Household Eligibility Applications are required for students desiring free milk. Milk is "priced" for students who do not meet the eligibility requirements for free milk. Served milk is counted and claimed in the correct categories. The site must ensure that overt identification is not occurring; for example, only collecting money from paid students in the classroom. SFAs set their own prices for paid milk, but must operate as a non-profit program. Paid milk is reimbursed at the current reimbursement rate. For free milk, reimbursement is the average cost per half-pint milk.

Sponsors are required to submit monthly **Claims for Reimbursements** for milk actually served to children. For the sites participating in a paid option where Household Eligibility Applications are not required, the sites are responsible for taking a point-of-service count of how many milks they provided to students each day. For sites that participate in the free option, they must take a point-of-service count each day that includes how many paid or free milks were provided. Milk served to adults cannot be claimed for reimbursement.

Claims must be made in terms of the number of half-pints (8 ounces) served even if the serving size is more or less than a half-pint. For example, if each student received only 4 ounces of milk, a half-pint of milk would serve two students. Based on this, the school will claim a half-pint of milk per every two students (1 half-pint claimed = 2 students.) There is no rule or regulation setting a minimum or maximum serving size of milk per child. However, the SFA can only be reimbursed for each half-pint of milk served and purchased.

Record Keeping

At a minimum, SFAs must maintain the following records for three years plus the current or longer if a review remains open:

- Documentation showing student eligibility for free or reduced price meals: Household applications; direct certification list; categorical eligibility listing.
- Meal counting and claiming documentation.
- Documentation of individual child's attendance on a daily basis.
- Menu, recipes, and production records related to the service of a reimbursable meal.

Visit the CNP website for current **Reimbursement Rates.**

After-School Snack Program

Reimbursement is available for children through the age of 18 for snacks served in the After- School Snack Program. The intent of this option is to assist schools in operating organized programs of care that include educational or enrichment activities.

Program Requirements

To be eligible for reimbursement for snacks under the NSLP After-School Snack Program, the program must meet the following requirements:

- Be operated by an SFA or RCCI that participates in the NSLP. The SFA must retain financial, administrative, and managerial responsibility of the After-School Snack Program.
- Provide organized, supervised, and structured activities designed with the purpose of caring for children in after-school settings.
- Include educational or enrichment activities for children.
- Serve all children.
- Operate only after the school day has ended or through 'expanded learning time' as defined by USDA as a school operating longer than the traditional school day for at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the LEA in which the school is located. Snacks cannot be reimbursed in programs operated before or during the child's school day.
- Operate only when school is in session. Snacks are not reimbursable on weekends, holidays, or during school vacations.

The SFA must review each After-School Snack Program two times per year. The SFA must make the first review during the first four weeks the program is in operation each school year.

Eligible Children

Students are eligible to participate through the age of 18. If a student's 19th birthday occurs during the school year, reimbursement may be claimed for snacks served to that student for the remainder of the school year. Snacks served to individuals, regardless of age, who are mentally or physically disabled and enrolled in the After-School

Snack Program qualify for reimbursement. SFAs that sponsor the After-School Snack Program can have community programs where participating children do not have to be enrolled as students with the SFA.

Menu Planning Options

See Afterschool Snack "Frequently Asked Questions" on the USDA's website.

Reimbursement

Under this provision, schools may claim reimbursement for one snack per child per day. There are two methods of reimbursement:

Area-Eligible Sites

At sites served by a school in which at least 50 percent of the enrolled children are eligible for free and reduced-price meal benefits, all snacks are claimed at the free rate. All children are served free at this site regardless of the individual child's eligibility. *Please note that area eligible sites wishing to serve a snack and/or supper may participate in the CACFP At-Risk Meals Program.*

Non-Area Eligible Sites

Sites not served by a school in which at least 50 percent of the enrolled children eligible for free and reduced-price meal benefits must claim snacks based on the income category (free, reduced-price, or paid) of the enrolled children.

Children cannot be charged for snacks claimed at the free rate of reimbursement. The maximum charge for a reduced-price snack is 15 cents. Sites set their own prices for snacks served to children that pay full price (though they must operate as non-profit program).

Visit the CNP website for current **Reimbursement Rates.**

Record Keeping

At a minimum, SFAs must maintain the following records for three years plus the current or longer if a review remains open:

- If all snacks are claimed free, documentation that the site is located in an area served by a school in which at least 50 percent of the enrolled students are certified eligible for free or reduced-price meals.
- For all other sites, documentation (household applications, Direct Certification, or categorical eligibility) of free and reduced-price eligibility for all children served free or reduced-price snacks that are claimed.
- Meal counts by category for non-area eligible sites.
- Total meal counts for area eligible sites.
- Documentation of individual child's attendance on a daily basis.
- Production records.

USDA Foods Program

The USDA Foods Program (formerly Commodity Food Distribution Program) not only supports American agricultural producers by providing cash reimbursements for meals served in schools, but also by providing nutritious, USDA-purchased food to the following nutrition programs:

- National School Lunch Program
- Child and Adult Care Food Program
- Summer Food Service Program

Donated USDA Foods must be of domestic origin, and nearly 60 percent of the foods purchased for the schools/Child Nutrition Programs must be determined by the USDA to be in surplus at the time of purchase.

Each year, schools and participating agencies participating in the NSLP and CACFP are eligible to receive USDA Foods, called "entitlement" foods, at a value set by the USDA for each lunch served.

Types of Foods Available Through the Food Distribution Program

States select a wide variety of USDA Foods, foods available include the following:

- Fruits and Vegetables
- Meats and Poultry
- Flour and Other Grain Products
- Eggs
- Cheese
- Pasta products

Bonus USDA Foods

Bonus foods are considered those over and above entitlement foods and are offered periodically, but only when there are agricultural surpluses. They are then offered to States on a fair-share basis, and do not count against a State's regular entitlement dollars.

Department of Defense (DoD) Fruit and Vegetable Program

The USDA annually allocates money for Alaska to spend with the Department of Defense Fresh Fruit and Vegetable Program (DoD). The DoD allows participation in the program to a limited number of schools that request on the road system.

Fresh Fruit and Vegetable Program

Overview

The Fresh Fruit and Vegetable Program (FFVP) is a reimbursement program that provides all children in participating schools with a fruit and vegetable snack during the school day. The goal of the FFVP is to create healthier school environments by expanding the variety of fruits and vegetables children are exposed to, and by increasing fruit and vegetable consumption.

Reimbursement for the FFVP is similar to the National School Lunch Program. Sponsors submit a monthly claim with the FFVP costs in CNPWeb. In addition to the claim page, FFVP sponsors are required to submit an itemized claim form documenting all FFVP expenses.

Program Participation

Program sponsors have flexibility to plan FFVP service so it best suits their school's schedule and needs. Fruit and vegetable snack service must occur during the school day, but outside of normally scheduled meal times. Sponsors can determine the frequency of service based on their allocated budget and produce costs. Fruit and vegetable snacks must be available for free for all enrolled students.

Participation in the FFVP is prioritized based on a school's free and reduced price percentage; highest need schools are prioritized. Additionally, other selection criteria include: being an elementary schools, participating in the National School Lunch Program, and applying annually for participation. Approved schools are awarded a per-student-allocation between $50 and $75 to operate the program for the school year.

Students attending a child care center, Head Start, or split-session kindergarten are eligible for participation if they are considered enrolled in the school. If the school is a K-12 school, only students enrolled in grades K-8 are eligible for participation. FFVP service is intended for students, and only teachers directly involved in the serving of fruits and vegetables to students are eligible to participate. The general adult population in the school should not receive fruit or vegetable snacks.

Allowable Items

Produce served in the FFVP should be raw, minimally processed (chopping or slicing is okay) fruits and vegetables. Canned, frozen, or dried items are not allowed. Other non-allowable items include:

- Fruit or vegetable juice
- Snack type fruit products
- Jellied fruits
- Trail mix
- Nuts
- Cottage cheese
- Fruit or vegetable pizza
- Smoothies
- Accompanying dips for fruit

Please note, dips are allowed to be served with vegetables provided that it is a low-fat dip, and is only served in the amount that is typical for condiments (1–2 tablespoons). Fresh vegetables (not frozen or canned) may be served in a cooked format no more than once per week, and must be served as part of a nutrition education lesson.

Reimbursable Costs

There are two main cost categories in the FFVP: operating costs and administrative costs.

Operating costs are the majority of costs for your FFVP grant. Operating costs include:

- Fruits, vegetables, and low-fat dips (for vegetables only)
- Non-food items like napkins, paper plates, serving bowls or tray, cleaning supplies, and trash bags
- Value-added services such as pre-cut produce, ready-made trays, and delivery charges
- Salaries and fringe benefits for employees who wash and chop produce, prepare trays, distribute produce, set up kiosks, and clean up

Administrative costs are limited to 10% of your school's total FFVP grant. Administrative costs include:

- Purchasing or leasing equipment such as refrigerators, coolers, carts, and portable food bars
- Salaries and fringe benefits for employees who compile claims and maintain reimbursement and financial reports, plan and write menus, order produce, track inventory, and coordinate nutrition promotion

If purchasing equipment, written justification must be submitted to Child Nutrition Programs, and the purchase must be approved prior to ordering. If equipment will be shared across nutrition programs, then the equipment cost must be prorated to the FFVP account in proportion to how frequently it will be used for the program.

For more information, please contact Child Nutrition Programs. Additionally, please reference the USDA FFVP Handbook, found here: http://www.fns.usda.gov/sites/default/files/handbook.pdf or Alaska Child Nutrition Programs eLearning, found here: https://education.alaska.gov/elearning/

Child and Adult Care Food Program

The Child and Adult Care Food Program (CACFP) is available to non-profit and for-profit nonresidential child or adult care centers; school-sponsored pre-K programs; family day care homes; Head Start centers; outside-of-school-hours care centers; and at-risk afterschool care centers.

Child Care Centers, Head Start, and School-Sponsored Pre-K Programs

- Provide reimbursement for meals served to children ages 12 and under.
- Sites must be licensed with the Alaska Department of Health and Social Services (DHSS) or the Municipality of Anchorage Department of Health and Human Services (DHHS) where applicable or if site is in a school they may be license-exempt when children are three years of age and older.
- The LEA must operate an enrolled program with enrollment documentation (collected annually) for all children and Household Income Eligibility applications or eligibility documentation on file for all children claimed in the free or reduced-price category.
- Meals offered to children ages 12 and under must meet the established meal pattern requirements to receive reimbursement.
- Meals for children without an Annual Enrollment Form on file (that includes normal days and times of care as well as the meals normally received) cannot be claimed. Meals for children not enrolled at the facility cannot be claimed.
- Up to **three** meal services **per child per day** can be reimbursed. The combinations are one meal (breakfast, lunch, and/or supper) and two supplements (snacks), or two meals and one supplement per child per day.

Outside School Hours Care Centers (OSHCC)

- Programs are for the care and supervision of children outside of the regular school hours, such as, before and after school, holidays, or during the summer vacation breaks.
- Sites must be licensed with the State DHSS or Muni DHHS where applicable.
  - A school's participation in the NSLP or School Breakfast Program (SBP) is sufficient proof of meeting required health and safety standards for CACFP purposes.
  - School sites are license-exempt when children are three years of age and older.
- The program should be organized for the purpose of providing services to non-residential children and must be distinct from extracurricular programs organized primarily for scholastic, cultural, or athletic purposes. School activities organized for purposes other than child care are not eligible to participate.
- Household Income Eligibility Applications or eligibility documentation must be approved and on file for all children claimed in the free or reduced-price category.
- Meals and/or supplements/snacks must meet CACFP meal pattern requirements by offering all required food items in appropriate portion sizes.
- The program is for children three through 12 years of age; migrant workers' children through 15 years of age; and mentally or physically disabled (as defined by the state) and enrolled at a school serving a majority of persons 18 years of age and younger.
- The program is year-round, even when school is not in session. Weekend-only centers operated by schools are not eligible.
- Annual enrollment forms (that includes normal days and times of care as well as the meals normally received) are required for programs serving lunch during periods of school vacation, including weekends and holidays and to children attending schools which do not offer a lunch program.

- Up to three meal services per child per day can be reimbursed (before and/or after the school day has ended). The combinations are one meal (breakfast, lunch, or supper) and two supplements/snacks or two meals and one supplement/snack per child per day. Meals and supplements are also reimbursable when children are out of school for summer break, vacations, holidays, and weekends.
- Schools are only eligible to serve lunches to enrolled children during periods of school vacation, including weekend and holidays, and to children attending schools which do not offer a lunch program.

At-Risk Afterschool Care Centers

- Organized to provide all children with regularly scheduled and planned educational or enrichment activities in a structured and supervised setting afterschool or on weekends, holidays, or school vacations during the regular school year.
- Must be located in schools in where at least 50 percent of the children are eligible for free or reduced-price meals in NSLP.
- Programs may be operated by a public, private non-profit, or private for-profit organization.
  - It must not restrict or exclude children on the basis of particular skills or interests. Extracurricular programs organized primarily for scholastic, cultural, or athletic purposes (e.g., honor society, school athletic teams) exclude children based on skills or interests and are not established for the care of children. Thus, these programs do not qualify to participate in the Child and Adult Care Food Program.
  - Organized athletic programs that only participate in interscholastic or community level competitive sports (for example, youth sports leagues, community soccer or football leagues, area swim teams, etc.) are not eligible.
  - Programs that include supervised athletic activity along with broad, overarching educational or enrichment program may participate. For example, a site has an after-school program available to all children, and this same school has an honor society meeting and basketball team practicing after school. Even though these two groups restrict participation, they could participate in the At-Risk After-School Meals Program because the school has a program open to *all* children.
- The snack and/or supper must meet CACFP meal pattern requirements by offering all the required food items in the appropriate portion sizes. Children ages 6 through 18 years of age should receive the portion stipulated for children 6 through 12 years of age; however, larger portions can be served to all students. Schools may follow the NSLP meal pattern and notify state agency if taking this option.
- Programs cannot charge children for the snack/supper.
- School-age children are eligible to participate through 18 years of age, or 19 if the student's 19th birthday occurs during the school year.
- The At-Risk Afterschool Meals Program can operate during the regular school year, but not during the summer when school is not in session. In areas where schools operate on a year-round basis, the after-school program may receive reimbursement for snacks and/or suppers all year for *on-track* children.
- The snack and supper are reimbursed at the free (highest) rate of reimbursement.
- This program can reimburse one snack and one supper served to each child daily after their school day has ended. A snack/meal may also be reimbursed if served at any time of the day on weekends or holidays, including vacation periods, during the regular school year.

Summer Meal Programs

Seamless Summer Option

Every school district that has schools where at least 50 percent of the students are eligible for free and reduced-price school meals AND has a summer school program operating during the summer months must provide a summer breakfast and/or lunch program for the students in that community. Two federal programs, the National School Lunch Program's Seamless Summer Option (SSO) or the Summer Food Service Program are available to assist in implementing and supplementing the cost of a summer food program. The Seamless Summer Option is outlined below. For more information on the Summer Food Service Program, please visit: https://education.alaska.gov/tls/cnp/sfsp.html

The Seamless Summer Option combines features of the NSLP, SBP, and the Summer Food Service Program (SFSP). This option reduces the paperwork and administrative burden, making it easier for schools to feed children from low-income areas during the traditional summer vacation periods, for year-round schools' breaks, and long school vacation periods (generally exceeding two to three weeks).

Benefits of Program

- Allows children to eat nutritional meals and snacks even when school is not in session.
- It is easy—SFAs continue the same meal service rules and claiming procedures used during the regular school year.
- There is reduced paperwork and monitoring rules to allow a streamlined approach to feeding hungry children in your community.

Participating Sites

Sponsors of the Seamless Summer Option may utilize any of the same site types as the Summer Food Service Program as long as they meet eligibility requirements.

School districts participating in the NSLP or SBP are eligible to apply for the Seamless Summer Option. Once approved by AK DEED, school districts serve meals free of charge to children 18 years of age and under from low-income areas. Districts may not operate this option at schools open only for students attending an academic summer school unless the doors are open to the surrounding community.

The same NSLP and SBP rules apply for the meal service for this option. Meals served are reimbursed at the NSLP and/or SBP "free" rates. Allowable meals may include breakfast, a.m. snack, lunch, p.m. snack, and supper. Up to two types of meals, except lunch and supper, per day can be reimbursed (three for migrant, Alaskan Native sites and camps).

Summer Food Service Program

The Summer Food Service Program (SFSP) provides nutritious meals to children during the summer months when school is not in session.

- Sponsoring organizations include public or private non-profit local education agencies; entities of state, local, municipal, or county government; residential camps; and private nonprofit organizations with Section 501(c)(3) status from the Internal Revenue Code.
- Participating sites: the various sites allowed to participate in the SFSP include:
  - **Open sites**—All children eat free in communities where at least fifty percent of the children are eligible for free/reduced-price school meals.
  - **Restricted-open sites**—Sites that meet the open-site criteria but are later restricted for safety, control, or security reasons.
  - **Closed-enrolled sites**—May be in any community for an enrolled group of low-income children and meets the fifty percent criteria explained above. This excludes academic summer schools.

- **Migrant sites**—Serving children of migrant families.
- **Alaskan Native sites**—Serving primarily Alaskan Native children.
- **Camps**—Residential or non-residential camps.

- Program meal patterns must be met in order to claim reimbursement.
- School-age children are eligible to participate through age 18 (or 19 if the student's nineteenth birthday occurs during the school year).

Comparison of Programs SFSP/NSLP/Seamless Option

This is a comparison between the various Child Nutrition summer feeding programs. The purpose of this comparison chart is to inform and encourage more School Food Authorities (SFAs) to provide meals in the summer and other times when school is not in session. Both the Summer Food Service Program and Seamless Summer Option reduce paperwork and administrative burden, making it easier for SFAs to feed children in low-income areas during the summer months or during the extended breaks of a year-round school schedule. Areas where the provisions in the Seamless Summer Option are the same as SFSP, rather than NSLP, are highlighted as Same as SFSP.

Comparison of Summer Meal Program Options

Topic	SFSP	NSLP/SBP	Seamless Summer Option
Eligible Sponsors	• SFAs, local government agencies, private non-profit organizations, universities or colleges, community & faith-based organizations • SFAs are waived of the requirement to demonstrate financial and administrative capability for program operations	SFAs	SFAs currently administering the NSLP and/or SBP
Times of Operation	• May – September for traditional school calendar areas • October – April during unanticipated school closures (i.e. emergencies) • During student vacations for schools on a continuous year calendar	When school is in session as established by the school district, including summer school.	Same as SFSP
Meal Service Locations	Schools, Camps, Churches, Community Centers, Housing Projects, Libraries, Migrant Centers, Parks, Playgrounds, Pools, Other public sites where children gather	• Schools • Residential Child Care Institutions (RCCIs)	Same as SFSP

Comparison of Summer Meal Program Options

Topic	SFSP	NSLP/SBP	Seamless Summer Option
Meal Cost for Children	All meals are free (Except camps are only reimbursed for children who qualify for free or reduced price meals, camp sponsors may, and usually do, provide meals free of charge to all children)	Meal cost (free/reduced price/ paid) for children is based on their income eligibility.	Same as SFSP
Establishing Site Eligibility	**Open Sites:** In the attendance area of a school or in a geographic area defined by census data where 50% or more children qualify for free or reduced price school meals, and open to community. **Enrolled Sites:** 50% or more of enrolled children are eligible for free or reduced price meals, determined by approved application, or operate in an eligible area. **Migrant/Native Alaskan Sites:** Certification by a migrant or native Alaskan organization that the sites serve children of migrant or native Alaskan children. **Camps:** offer a regularly scheduled food service as part of an organized program for enrolled children. *As applicable, alternative forms of data may be used to establish site eligibility, including Special provision data (including Community Eligibility) under NSLP/ SBP, and Census data.	Schools: Public and private non-profit schools of high school grade and under that are part of State's education system. RCCIs: Public and licensed, non-profit, private	Same as SFSP
Type of Meals	• Breakfast • Lunch • Snack (AM or PM) • Supper Lunch and supper cannot be reimbursed for the same day by the same site, except for camp and migrant sites.	• Breakfast • Lunch • Afterschool Snacks	Same as SFSP
Maximum Number of Meals	2 meals for most sites 3 meals for migrant/Alaskan Native sites and camps.	• Breakfast • Lunch • Afterschool Snacks	Same as SFSP

Comparison of Summer Meal Program Options

Topic	SFSP	NSLP/SBP	Seamless Summer Option
Meal Service Time Requirements	No time limits on duration of meal service or amount of time that must elapse between the beginning of one meal and the beginning of the next.	Breakfast must be served in the morning hours; lunch must be offered between 10:00 am and 2:00 pm.	Breakfast must be served in the morning hours; lunch must be offered between 10:00 am and 2:00 pm; snacks must be evenly and adequately spaced between other meal service times; supper meal times must be established for each site.
Reimbursement Rates	Higher than NSLP, typically updated in January with NSLP/SBP rates.	NSLP/SBP rates typically updated every July	Same as NSLP/SBP
Reimbursement Methods	SFSP sponsors receive the maximum reimbursement (meals times rates) without regard to their actual or budgeted costs. Sponsors may use reimbursements to pay for any allowable program cost. Camps are reimbursed only for meals served to children eligible for free or reduced-once meal.	Total meals by type times the free, reduced, or paid rate for each type of meal. Extra $ 0.06 per lunch if menus meeting meal pattern are "certified." Additional payments for free or reduced price breakfasts in severe need schools.	If area eligible, all meals reimbursed at NSLP/SBP free rate. If applications required (Camps or closed enrolled in non-eligible area), free and R/P meals reimbursed at free NSLP/SBP rate. No reimbursement for paid meal.
Monitoring Required of SFA/ Sponsors	Pre operational visits before a new or problem site operates the summer program. Site visits the first week of operation (waived for sites that operated successfully the previous summer). Site review during first 4 weeks of operation including collection of racial/ethnic data, followed by additional monitoring as needed.	Onsite review of lunch counting and claiming system for each school by Feb. 1st each year.	Review of meal counting, claiming and meal pattern compliance at least once during each site's operation.
Monitoring Required of State	Review every 3 years; more frequently based on program size and prior problems identified by the SA	Administrative reviews every 3 years	An administrative review of a SFA participating in the option must include one SSO site. The review may be conducted in the summer prior to or following the scheduled administrative review.

Comparison of Summer Meal Program Options

Topic	SFSP	NSLP/SBP	Seamless Summer Option
Meal Pattern	Meal pattern must meet 7 CFR 225.16(d) standards. However, SFAs may substitute NSLP/SBP meal patterns.	Must meet requirement for NSLP in 7 CFR 210.10; or SBP in 7 CRF 220.8.	Same as NSLP/SBP
Eligible Participants	Persons 18 years or younger and persons 19 or older with a physical or mental disability, as defined by the State.	Students enrolled in a school of high school grade and under determined by the SA; including persons enrolled in a school program for the mentally or physically disabled; and persons under 21 enrolled in an RCCI.	Same as SFSP
Public Notification	Sponsor must send public media notice regarding program and eligibility.	SFA must send public media notice regarding program and letter or notice with an application to parents for all children in attendance at the school at the beginning of each school year.	Public media notice may be done but is not required. SFA must state in application how each site (excluding closed enrolled sites) will advertise availability of meals to neighborhood community.

Menu Planning & Meal Pattern Requirements

Required Menu Planning Records
NSLP Meal Pattern
SBP Meal Pattern
After-School Snack Program
Local and Traditional Foods
Menu Planning Resources

Required Menu Planning Records

Menu

The menu is the core of the program and must list all food items offered to students as part of a reimbursable meal. When planning the menu, the menu planner should consider the foods available (including commodities), standardized recipes available, and the food service budget.

Menu Planning Checklist

- Schedule a time to plan and collect menu resources.
- Consider previous menus and current meal pattern requirements.
- Determine number of days to be planned.
- Focus on grade group(s) to be served.
- Decide the number of choices to be offered.
- Select the entrée for each day being planned.
- Select the other required meal components. Keep in mind the NSLP requirement to meet the vegetable sub-groups throughout the week.
- Ensure at least two milk choices are offered.
- Make sure the daily and weekly minimum serving sizes are met for each component.
- Evaluate success of current and past menus, and make notes for future menus.
- Consider marketing ideas, menu themes, school events, and seasonal items.

Cycle Menu

A cycle menu that follows meal pattern requirements is strongly encouraged. Menu planners can decide on the length of the cycle to be used, which may be a set number of days or weeks. Some of the benefits of cycle menus are:

- Reduces the labor/time involved in planning menus;
- Reduces excess inventory or inventory in sizes too small to menu;
- Helps reduce plate waste through use of tried and tested meals;
- Reduces foods costs by allowing more foods to be ordered in bulk;
- Cuts ordering/purchasing time due to repeated use of foods/meals; and
- May increase participation through planning of the most popular meals.

Sample Cycle Menu

	MONDAY	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY
Week 1	Tuna Fish Sandwich, Potato Wedges, Canned Peaches, Milk	Chicken Fajitas with Cheddar Cheese, Rocking Red Beans, Spanish Brown Rice, Mixed Fruit, Milk	Beef Stroganoff with Brown Rice or Noodles, Pizza Green Beans, Strawberry Cup, Milk	Baked Halibut, Broccoli, Brown Rice, Canned Pears, Milk	Spaghetti and Meat Sauce, Mixed Vegetables, Applesauce, Milk
Week 2	Sweet and Sassy Chicken, Broccoli, Brown Rice, Strawberry Cup, Milk	Sloppy Joes with Baked Beans, Canned Peaches, Milk	Sweet and Sour Fish, Corn, Brown Rice, Canned Pears, Milk	Mac n' Cheese with Broccoli, Carrots, Mixed Fruit, Milk	Whole Grain Cheese Pizza, Pizza Green Beans, Applesauce, Milk
Week 3	Meatloaf, Crushed Hot Potatoes, Biscuit, Applesauce, Milk	Baked Halibut, Broccoli, Brown Rice, Canned Pears, Milk	Chicken Fajitas with Cheddar Cheese, Rocking Red Beans, Spanish Brown Rice, Mixed Fruit, Milk	Barbequed Chicken, Sweet Potato Fries, Cornbread, Canned Peaches, Milk	Spaghetti and Meat Sauce, Mixed Vegetables, Strawberry Cup, Milk
Week 4	Sloppy Joes with Baked Beans, Canned Peaches, Milk	Mac 'n Cheese with Broccoli, Carrots, Mixed Fruit, Milk	Chicken Alfredo with a Twist, Broccoli, Strawberry Cup, Milk	Sweet and Sour Fish Stickes, Corn, Brown Rice, Canned Pears, Milk	Whole Grain Cheese Pizza, Pizza Green Beans, Applesauce, Milk

Menu Posting Requirement

Schools are required to post a menu(s) near the beginning of the meal service line(s) so students know what foods are offered or can be chosen as part of a reimbursable meal. Menus do not need to include foods that are only served as an a la carte option.

This menu requirement can be satisfied in the form of a written daily or weekly menu, through use of a sample/display tray, or by using menu posters. CNP can provide a dry erase poster based on My Plate for SFA use.

Menu Certification

All SFAs are now required to maintain certified menus that meet USDA standards. The certification provides SFAs with an additional six-cents per lunch reimbursement. This certification is monitored during the Administrative Review process to ensure that SFAs continue to meet the USDA standards.

Six-cent Certification worksheets are required for each distinctive menu provided by an SFA, and are required to be supported with production records, recipes, CN labels, product formulation sheets, and meal count records. SFAs serving meals without a certified menu will lose the six-cent reimbursement and will be issued corrective action to correct and certify all menus.

Information on the menu certification process, including YouTube video training on the process, can be found on the USDA website at http://www.fns.usda.gov/school-meals/certification-compliance.

Daily Production Record

A daily production record is required and must contain the following information:

- Food components (meat/meat alternate, vegetable, etc.), condiments, and milk
- Recipe (note if a USDA recipe) or food product used. USDA commodity items should be identified with a "C", and a USDA processed commodity, should be identified with a "PC"
- Planned/projected number of student portions and serving sizes for each grade

group
- Planned/projected number of portions and serving sizes for adults
- Total amount of food prepared (for example, number of servings, pounds, cans, etc.)
- Number of reimbursable meals served (indicate this information for each grade group)
- Actual number of non-reimbursable meals served (such as to adults or a la carte sales)
- Leftovers and substitutions

Production records may vary in format, but they must accomplish two things:
- Provide staff information regarding foods and portion sizes of servings
- Record actual foods and portion sizes served as well as leftovers

Production records must contain all of the required information outlined above. To ensure compliance please copy the sample on the following page or download the electronic Production Records Food Based at: https://education.alaska.gov/tls/cnp/NSLP2.html under Templates and Worksheets.

Sample Production Record Template

Food Based Production Record - Lunch

Menu
Fish Sticks with Whole grain breading
Sweet Potatoe Wedges
Steamed Broccoli
Watermelon slices
Milk

Site: ABC Elementary
Date: Grades Served: K-5
Unusual Event:
Signature:

Number of Meals	Planned	Served
Student Meals	250	235
Adult Meals/Seconds		
A la Carte Meals		
Total Meals	250	235

PLANNING SECTION										DAY OF SERVICE SECTION	
Item A		Item B	Item C		Item D		Item E		Item F	Item G	Item H	Item I
Menu Item		Recipe # or Product Name	Grades K-5		Grades 6-8		Grades 9-12		Total Units Planned	Purchase Unit Food Buying Guide or Manufacturers Analysis	Total Units Prepared/Offered	# of Portions Leftover
			Portion Size	Planned # of Servings	Portion Size	Planned # of Servings	Portion Size	Planned # of Servings				
Meat/Meat Alternate												
Fish Sticks		Trident	**2 sticks**	250					500 Sticks	2 cases (250 per case)	500	0
									0			
Fruit												
Watermelon slices		Fresh	**1/2**	250					125	3 Melons (about 27 lb)	250	10
									0			
Vegetable												
Red/Orange	Sweet Potatoe	USDA Com	**1/2**	250					125	55 lbs.	250	50
Dark Green	Broccoli	USDA Com	**1/2**	250					125	18 lbs.	250	40
									0			
									0			
									0			
Bread/Grain												
Breaded Fish Stick		Trident	**1 1/2**	250					500	fish sticks 1.5 oz breading	250	0
									0			
									0			
2 Milk Choices												
Non-Fat Flavored		Dairy Gold	1	75					75	pint	75	0
1% Unflavored		Dairy Gold	1	175					175	pint	175	10
Extras/Condiments												
Tarter Sauce		B-12	2	250					500	1 Jar (500 serving)	250	0
									0			

Weekly Serving Requirements (5-Day Week)	Grades K-5	Grades 6-8	Grades 9-12
Fruit	2½ cups	2½ cups	5 cups
Vegetables	3 ¾ cups	3 ¾ cups	5 cups
Dark Green	½ cup	½ cup	½ cup
Red/Orange	¾ cup	¾ cup	1 ¼ cups
Beans/Peas (Legumes)	½ cup	½ cup	½ cup
Starchy	½ cup	½ cup	½ cup
Other	½ cup	½ cup	¾ cup
Additional Vegetables to Reach Total	1 cup	1 cup	1 ½ cups
Grains	8-9 ounces	8-10 ounces	10-12 ounces
Meat/Meat Alternates	8-10 ounces	9-10 ounces	10-12 ounces
Milk*	5 cups	5 cups	5 cups

Acceptable Milk Choices*
1% Unflavored
Non-Fat Unflavored
Non-Fat Flavored
Non-Fat Powdered

Sample Production Record

Food Based Production Record - Lunch

Menu

Site:

Date: Grades Served:

Unusual Event:

Signature:

Number of Meals	Planned	Served
Student Meals		
Adult Meals		
A la Carte Meals		
Total Meals	0	0

PLANNING SECTION										DAY OF SERVICE SECTION	
Item A	Item B	Item C		Item D		Item E		Item F	Item G	Item H	Item I
Menu Item	Recipe # or Product Name	Grades K-5		Grades 6-8		Grades 9-12		Total Units Planned	Purchase Unit Food Buying Guide or Manufacturers Analysis	Total Units Prepared	# of Portions Leftover
		Portion Size	Planned # of Servings	Portion Size	Planned # of Servings	Portion Size	Planned # of Servings				
Meat/Meat Alternate											
								0			
								0			
Fruit											
								0			
								0			
Vegetable											
								0			
								0			
								0			
								0			
								0			
Bread/Grain											
								0			
								0			
								0			
2 Milk Choices											
								0			
								0			
Extras/Condiments											
								0			
								0			

Processed Products and Nutrient Facts

Nutrition Facts Labels

In order to analyze the nutrient content of a menu, specific nutrient information is required. This information may come in the form of a Nutrition Facts label. A Nutrition Facts label may be found on the box, can, or package of the food item. Nutrition information is recommended for items received as government-donated commodities.

NOTE: Sometimes the Nutrition Facts label does not include the name of the food item or product. If this is the case, please indicate the name of the product somewhere on the nutrient information. Copy the entire product label including the nutrition facts section or write on the nutrition facts section the name of the product. Please also note that the serving size may or may not be the required serving size for a creditable portion in the lunch or breakfast program.

Nutrition Facts
Serving Size (111g)
Servings Per Container

Amount Per Serving

Calories 90	Calories from Fat 10
	% Daily Value*
Total Fat 1g	**2%**
Saturated Fat 0g	**0%**
Cholesterol 40mg	**13%**
Sodium 360mg	**15%**
Total Carbohydrate 5g	**2%**
Dietary Fiber 0g	**0%**
Sugars 1g	
Protein 15g	

Vitamin A 0% • Vitamin C 2%
Calcium 6% • Iron 2%

*Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

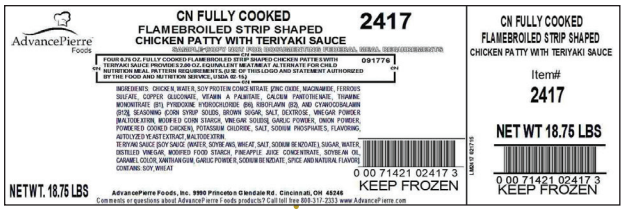
	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Saturated Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:
Fat 9 • Carbohydrate 4 • Protein 4

Child Nutrition Labels

The Child Nutrition (CN) Label is the preferred method for verifying the crediting of menu items. In addition it provides a warranty against audit claims when the product is used according to the manufacturer's instructions. Valid and acceptable documentation for the CN Label is:

- The original CN Label from the product carton; OR
- A photocopy of the CN Label shown attached to the original product carton; OR
- A photograph of the CN Label shown attached to the original product carton.
- (CN Labels that are photocopied or photographed must be visible and legible.)



NOTE: CN labels assist in crediting food items to the meal pattern, but do not include nutrient information. Please ensure all products contain nutrient information

and, if available, a CN label. Additional information regarding CN labels is available at http://www.fns.usda.gov/cnlabeling/general-background.

If the original CN Label, or a valid photograph or photocopy of the original CN Label, is not available, program operators must have an invoice that includes the product name, AND:

- A hard copy of the CN Label copied with a watermark displaying the product name and CN number provided by the vendor; OR
- An electronic copy of the CN Label with a watermark displaying the product name and CN number provided by the vendor.

Fact sheets and product labels provide a way for food manufacturers to communicate with program operators about how their products may contribute to the meal pattern requirements for meals served under USDAs Child Nutrition Programs. Schools are not required to offer processed products with CN Labels; however, it is important to recognize that CN Labeled products ensure that the food provides the stated contribution toward CN meal pattern requirements.

Products purchased to be used in reimbursable meals that do not have a CN label should have a Product Formulation Statement on the manufacturers' letterhead that provides information on the processed product and how the item contributes to the meal pattern requirements. This information must be obtained from the manufacturer. Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements therefore they must keep records of supporting documentation (original CN product label from the product carton or signed Product Formulation Statements).

Product Formulation Statements

An appropriate Product Formulation Statement will provide specific information about the product and show how the credit is obtained citing CN Program resources and/or regulations. http://www.fns.usda.gov/cnlabeling/food-manufacturersindustry

- Review Product Formulation Statements prior to purchasing processed products. These documents are only for products with an M/MA contribution and would need to be adapted for the various types of products available. Pizza, for example, could have credit information about grains/breads and vegetables, and/or fruits in addition to the meat/meat alternate component.
- Determine that creditable ingredients listed in the product formulation statement match a description in the Food Buying Guide Calculator for Child Nutrition Programs available at: http://fbg.nfsmi.org/Default.aspx. If a Product Formulation Statement for a specific product claims to provide a higher credit than what is listed in the FBG, the statement must clarify all crediting ingredients, and demonstrate how the product provides that credit according to FNS regulations, guidance, or policy.
- Verify that the amount of credit that a product may contribute to the meal pattern requirements is not greater than the serving size of the product. For example, a 2.2 fluid ounce (1/4 cup) frozen fruit pop or bar may not credit for more than 2.2 fluid ounces or ¼ cup of fruit or fruit juice.
- Verify that the Product Formulation Statement proves how the claimed credit was obtained. It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit for the CN meal pattern.

Standardized Recipes

Standardized recipes are required for any menu item that contains two or more ingredients. Standardized recipes have been tried, adapted, and retried several times for use by a given food service operation. Standardized recipes produce the same results each time the item is prepared and:

- Ensure product quality;
- Make menu planning more consistent;
- Make cost control easy; and
- Produce the same consistent product.

If a school is standardizing a recipe, or modifying an existing recipe, detailed records should be kept. The following information must be included on the form:

- Yield: Include serving size and number of servings.
- All ingredients: Provide as much information as possible for each ingredient. Include the form such as fresh, frozen, or canned; packing medium such as canned in juice or light syrup, frozen with added sugar, or plain; fat content such as 20 percent fat ground beef or ground pork, no more than 30 percent fat.
- Correct measures, weights, and/or package size.
- Preparation procedures.

Visit the Institute of Child Nutrition at http://www.nsfmi.org to access the USDA Recipes for Schools database.

NSLP Meal Pattern

The National School Lunch Program (NSLP) meal pattern applies to schools participating in the NSLP, grades K through 12.

Highlights of USDA NSLP Meal Pattern

The following are some of the major changes from prior menu plans.

- Fruits and Vegetables must be menued as separate meal components.
- Vegetable group is made up of five vegetable sub-groups: Dark Green; Red/Orange; Beans/Peas(Legumes); Starchy; and Other.
- Grains and Meat/Meat Alternates groups have daily and weekly minimum servings.
- All grains menued for the week must be whole grain-rich.
- Daily calories have a minimum and maximum (average daily calories over the week).
- Flavored milk must be fat-free, unflavored milk can be fat-free or 1%. (1% Flavored milk waiver is available)
- Calories from saturated fat limited to 10%.
- CACFP Meal Pattern for Pre-K

Grade Groupings

The USDA meal pattern for NSLP has three grade groupings*:

- K–5
- 6–8
- 9–12

*School sites that have grades that overlap K–5 and 6–8, or that includes all grades K-8, have the option of doing a combined K–8 grade grouping.

Each of the grade groups has specific requirements that must be met. USDA no longer allows schools that have one grade outside a set grade grouping to plan menus that meet the majority of the students. However, the updated USDA menu plan does have an overlap in the meal requirements for the K–5 and 6–8 grade groupings. This would allow a K–8 school to plan to serve the same amount of food for the entire school.

The 9–12 grade grouping does not overlap the requirements of the two younger grade groups, so a K–12 school would need to be prepared to serve at least two grade groups.

In the following section, each meal component is discussed. Overlaps in grade group requirements will be highlighted to assist in meal planning.

Meal Components

All lunch meals planned under the USDA requirements are required to have five (5) components: Fruits; Vegetables; Grains; Meat/Meat Alternates; and Fluid Milk.

Fruits

The K–5 and 6–8 grade groups have a total weekly requirement of 2 ½ cups, and a daily requirement of ½ cup. Shown in the chart below as 2 ½ (½), with the daily requirement shown in parenthesis.

The 9–12 grade group has a weekly requirement of 5 cups, and a daily requirement of 1 cup.

Lunch Meal Pattern

FRUIT			
	Grades K–5	Grades 6–8	Grades 9–12
	K–8 Combined Grouping		
Total Cups/Week (Daily Servings)	2 ½ (1/2)		5 (1)

- **Juice** is allowed to be served and credited for the amount served. However, only half of the total weekly fruit servings for the week can come from juice. On a daily basis schools can plan to serve whole fruits only, juice only, or a combination of both as long as the total of the juice planned for the week does not exceed half of the weekly total. Juice must be 100% fruit juice.

  For the K–5 and 6–8 grade groups, the total planned amount of juice cannot exceed 1 ¼ cups for the week. For the 9–12 grade group, the total planned amount of juice cannot exceed 2 ½ cups for the week.
- **Dried fruits** are allowed to be served and credit as twice the amount served. For example, a ¼ cup of dried apricots would credit for a ½ cup serving of fruit.

Vegetables and Vegetable Subgroups

The K–5 and 6–8 grade groups have the same total weekly requirement of 3 ¾ cups vegetable servings and a daily requirement of a ¾ cup vegetable servings. The 9–12 grade group has a weekly requirement of 5 cups with a daily requirement of 1 cup.

The vegetable component has five subgroups that must be served during the week. The five groups are: Dark Green, Red/Orange, Beans/Peas (Legumes), Starchy, and Other. Schools can choose to serve subgroups on different days of the week (for example Monday could be dark green day), or schools can choose to serve a variety of vegetables each day and have multiple days with smaller servings of each of the vegetable subgroups, so long that the weekly requirement for each vegetable subgroup has been met.

For example, the K–5 group must have a total of a ½ cup of dark green vegetables for the week. A school could choose to serve dark green vegetables twice a week, at a ¼ cup each time to meet the ½ cup weekly requirement for the dark green vegetables. The minimum amount of any vegetable that can credit towards daily or weekly totals is 1/8 cup.

Examples of Vegetable Subgroups

- Dark Greens: broccoli, collard greens, spinach
- Red/Orange: carrots, sweet potatoes, tomatoes
- Beans/Peas (legumes): kidney beans, lentils, lima beans (not green beans)
- Starchy: corn, green peas, white potatoes
- Other: onions, green beans, cucumbers
- Addtional vegetables: used to meet weekly total

It is important to note that the daily vegetable serving requirements are often greater than each vegetable subgroups weekly requirement. For example, the 6–8 grade group has a total weekly vegetable requirement of 3 ¾ cups, and a daily minimum requirement of ¾ cup. Each week the 6–8 grade group must be served at least a ½ cup of the dark green vegetable subgroup. That ½ cup counts toward the weekly total of 3 ¾ cups. If a school chose to make Monday, dark green vegetable day and only served a ½ cup of dark green to meet that vegetable subgroup requirement, they would be short a ¼ cup of meeting the minimum daily requirement for the 6–8 grade group of ¾ cup. This is when the **Additional Vegetables to Reach Total** row on the chart is used. The **Additional Vegetables to Reach Total** is not one of the 5 vegetable groups. The grade groups vegetable subgroups amounts are less than the total weekly vegetable requirements.

Lunch Meal Pattern

LUNCH MEAL PATTERN—Vegetables			
	Grades K–5	Grades 6–8	Grades 9–12
	K–8 Combined Grouping		
Total Cups/Week (Daily Servings)	3 ¾ (3/4)		5 (1)
Dark Green/Week	½		½
Red/Orange/Week	¾		1 ¼
Beans/Peas/Week (legumes)	½		½
Starchy per Week	½		½
Other per Week	½		¾
Additional amount of any vegetable to reach weekly total	1		1 ½

- Mixed Vegetable Dishes: To allow mixed vegetable dishes to credit toward vegetable subgroups, schools should choose CN labeled products that show the creditable amounts of vegetables, or have a standardized recipe that would substantiate the specific vegetables in a mixed vegetable dish as being provided in an amount of 1/8 cup or greater. Again, any vegetable in an amount less than 1/8 cup cannot be credited toward a given vegetable subgroup.
- A mixed vegetable item may not credit toward meeting any of the 5 vegetable subgroup if none of the vegetables in the medley is equal to or greater than 1/8 cup, or if there is not documentation to prove how much of a serving credits towards a vegetable subgroup, however the food item would still be considered as an "Other" vegetable portion of the Additional Vegetables to Reach Weekly Total.
- Vegetable Juice is allowed to be served, and falls under the same guidelines as fruit juice. Vegetable Juice credits for the amount served and must be 100% juice. Of the weekly amount of vegetables planned for the week, no more than half can come from juice.
- Leafy vegetables only credit for half of the amount served. For example, 1 cup of Romaine lettuce would only credit for ½ cup serving of dark green vegetables.

Grains

All grains served as part of a NSLP reimbursable meal must be whole grain-rich (WGR) which means that the food item must contain at least 50% whole grains. The amount of grains to be served is shown in the chart and shows the minimum daily and minimum weekly requirements for all grade groups. Maximums shown are suggested maximums set by the USDA; exceeding maximum serving sizes is allowed as long as calories, saturated fat, trans fat, and sodium standards are not exceeded.

Grade groups K-5 and 6-8 have a weekly minimum of 8-ounce equivalent which would allow schools that have grades that fall into both of these grade groups to serve at least 8-ounce equivalent per week. K-5 and 6-8 grade groups both have a minimum of 1-ounce equivalent daily requirement.

Lunch Meal Pattern

WGR GRAINS				
Total Weekly Ounces Equivalents (Daily Servings)	Grades K–5	Grades 6–8	K–8 Combined	Grades 9–12
	8–9 (1)	8–10 (1)	8–9 (1)	10–12 (2)

The Whole Grain Rich Requirement is met if the Grain meets one of the following:

- Whole grains per serving > 8 grams
- Product includes FDA's whole grain health claim on its packaging
- Product label's ingredient list, lists a whole grain item first. i.e. **Whole** wheat flour. A product with **Wheat flour** as the first ingredient would not qualify.
- Grain Based Desserts are allowed to be served by schools as long as the amount served does not exceed 2-ounce equivalent. The 2-ounce equivalent is counted toward the weekly grains in the chart shown above; it is not in addition to the weekly amounts. Schools can choose how to serve the 2-ounce equivalent of grain based desserts: one 2-ounce cookie; two 1-ounce cookies; four .5-ounce cookies, etc.

Additional Grain requirements information is available in USDA Policy Memo SP 30-2012. Districts who face hardships acquiring and serving whole grain products may be eligible for a partial waiver. Please contact CNP for more information.

Meat/Meat Alternates

There are minimum daily and weekly requirements for the meat/meat alternates component for all grade groups. The maximums shown are suggested by USDA. Exceeding the set maximums is allowed as long as calories, saturated fat, trans fat, and sodium standards are not exceeded. Similar to the grains component, the meat/meat alternates component has weekly minimums listed with the daily minimum serving in parenthesis.

Grade groups K–5 and 6–8 have an overlap of amounts allowed to be served. K–5 has a weekly minimum of 8-ounce equivalent, and the 6–8 grade group has a weekly minimum of 9-ounce equivalent. This would allow schools that have grades that fall into both of these grade groups to plan to serve a minimum of 9-ounce equivalent per week and satisfy both groups. Both of these grade groups have a minimum of 1 ounce equivalent daily requirement.

Lunch Meal Pattern

MEAT/MEAT ALTERNATES				
	Grades K–5	Grades 6–8	K–8 Combined	Grades 9–12
Total Weekly Ounces Equivalents (Daily Servings)	8–10 (1)	9–10 (1)	9–10 (1)	10–12 (2)

- Tofu and Soy Products which meet USDA crediting will be allowed as meat alternates. Please view USDA Policy Memo SP 16-2012 for crediting information.

Fluid Milk

Two types of milk must be offered. Any two types that meet the following criteria are allowed. Unflavored milk that is fat-free or low-fat (1%); or flavored milk which must be fat-free. (1% Flavored milk waiver may be submitted for approval). SFAs who are unable to obtain a supply of fluid milk on a continuing basis may be able to use canned or powdered milk. Whole milk and reduced-fat (2%) milk are not allowed to be served unless a student has a medical statement on file requiring these milk types.

Lunch Meal Pattern

MILK			
	Grades K–5	Grades 6–8	Grades 9–12
	K–8 Combined Grouping		
Total Cups/Week (Daily Servings)	5 (1)		5 (1)

Milk substitutions must meet USDA nutritient requirements:

Dietary Specifications

Meals served as part of the NSLP must meet the following requirements for calories, saturated fat, trans fat, and sodium.

Lunch — Four Dietary Specifications

	Grades K–5	Grades 6–8	K–8 Combined	Grades 9–12
Min & Max Calories	550–650	600–700	600–650	750–850
Saturated Fat (% of Total Calories)	<10	<10	<10	<10
Sodium (mg)	< 1230	< 1360	< 1230	< 1420
Trans Fat[1]	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.			

The standards for sodium, calorie minimums and maximums, and saturated fat are met based on averages for the week. During the week, one or more days may be out of the required ranges, or past the maximums, but the weekly average is reviewed for overall compliance.

[1] Products and ingredients used to prepare meals must be trans-fat free (less than 0.5 gram per serving). This only applies to trans-fat added products, not products with naturally occurring trans-fat.

CACFP Meal Patter for Pre-K

The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, amended section 17 of the Richard B. Russell National School Lunch Act (NSLA), 42 U.S.C. 1766, to require the U.S. Department of Agriculture (USDA) to update the CACFP meal pattern requirements to make them more consistent with (a) the most recent version of the Dietary Guidelines for Americans, (b) the most recent relevant nutrition science and (c) appropriate authoritative scientific agency and organization recommendations.

Both family style meals and OVS are types of meal service in CACFP and there are some key differences between the two. First, food components in family style meals are self-served by the child participant, while food components in OVS are pre-portioned or served directly by the provider. However, OVS is not allowed to be conducted in school-run preschool programs.

Second, while children must be offered the minimum required serving sizes of each required meal components in both family style meals and OVS, in family style meals, a child does not need to take the full minimum required serving size of a food component to receive reimbursement.

When a child does not take a food component or the full minimum serving size of a food component during family style meals, the supervising adult must encourage the child to serve themselves the full minimum serving size. However, if the child does not serve themselves a food component or take the full minimum serving size of a food component when using family style meal service, the meal may still be reimbursed.

CACFP Preschool Dietary Specifications

Sugar limits on breakfast cereals and yogurt	
Sugar Limits	Yogurt: Must contain no more than 23 grams of sugar per 6 oz.
	Breakfast Cereal: Must contain no more than 6 grams of sugar per dry oz.

Please refer to 7 CFR 210.10 Meal requirements for lunches and afterschool snacks for preschool meal pattern and additional meal pattern requirements

CACFP Preschool Lunch Meal Pattern Ages 3–5

Food Components and Food Items	Minimum Quantities
Fruits	1/4 Cup
Vegetables	1/4 Cup
When two different kinds of vegetables are served at lunch the vegetable may be used to meet the entire fruit requirement.	
No Vegetable subgroups required	
Grains (oz eq)	1/2 serving
Whole grain-rich or enriched bread, and NO grain based deserts	
Meat/Meat Alternates (oz eq)	1 1/2 oz
See meal pattern for additional portion sizes	
Fluid Milk	6 fluid oz
No flavored milk allowed for 0–5 years old. Ages 6 and older flavored milk must be fat free. See guidance for non-dairy beverages.	

Offer Versus Serve—Lunch

Offer Versus Serve (OVS) is a concept that applies to menu planning and the meal service. OVS allows students to decline some of the food offered in a reimbursable lunch or breakfast. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat. Due to the fact that students may choose fewer selections under OVS, guidance is provided on what constitutes a reimbursable lunch and breakfast.

Under OVS, students are allowed to select only three of the five required lunch components. However, for a meal to be reimbursed, the student must be offered all five components and select at least three of the components, and at least one of the components selected must be a full serving of fruit or vegetable.

Once a student has at least three components in the required serving sizes (one of which is a fruit and/or vegetable) schools can allow or encourage tasting or partial servings of the remaining components. This may be especially effective when introducing new foods or when working with younger students who may not be as comfortable trying new foods. The smaller tasting portions will not be as overwhelming to a younger student as a full serving would be.

Regardless of whether a student in an OVS school chooses three, four or all five components, meals are priced as a unit; students pay the same price for a paid or reduced-price meal regardless of whether three, four or all five components were selected.

Students must be **offered** all five required components:

1. Fruit
2. Vegetable
3. Grain
4. Meat/Meat Alternate
5. Fluid Milk

SBP Requirements Pattern

Highlights of School Breakfast Program (SBP) Meal Pattern

The following are some of the major changes from prior menu plans.

- Grain component has daily and weekly minimum serving sizes.
- Minimum of 1 cup of fruit must be menued each day.
- Schools choosing Offer vs Serve for breakfast must require students to select no less than ½ cup of fruit
- No requirement to menu meat/meat alternates
- All grains menued for the week must be whole grain-rich.
- Daily calories have a minimum and maximum (average daily calories over the week).
- Flavored milk must be fat-free; unflavored milk can be fat-free or 1%.
- Calories from saturated fat limited to 10%.

Grade Groupings

Beginning July 1, 2012, the new USDA meal pattern for NSLP has 3 grade groupings:

- K–5
- 6–8
- 9–12

- School sites that have grades that overlap K–5 and 6–8, or that includes all grades K–8 have the option of doing a combined K–8 grade grouping.
- Districts that serve grades K–12 can choose to do one K–12 grade grouping.

SBP Meal Components

The components listed in the table are required for breakfast. Maximum servings shown for grains are suggested by USDA. Exceeding the maximums is allowed as long as calories, saturated fat, trans fat, and sodium standards are not exceeded.

Weekly amounts are listed, with daily required serving sizes in parenthesis.

	Grades K–5	Grades 6–8	Grades 9–12
Fruits	5 (1)—Cups	5 (1)—Cups	5 (1)— Cups
Grains	7-10 (1)—Oz Eq	8-10 (1)—Oz Eq	9-10 (1)—Oz Eq
Fluid Milk	5 (1)— Cups	5 (1)— Cups	5 (1)— Cups

Fruit

- A one cup serving must be menued/offered daily.
  - Schools may choose to serve vegetables to satisfy the 1 cup of fruit requirement.
  - Schools choosing to use vegetables must select the first 2 cups of vegetables for the week from the Dark Green, Red/Orange, Beans/Peas, or Other subgroups.
- No limit on fruit, however calorie range requirements must be met.
- Fresh, frozen, canned, 100% juice, and dried fruits or vegetables are allowed.
- No more than ½ the fruit menued during the week can come from juice.
- Fruit smoothies are allowed
  - Smoothies prepared on-site may credit toward the fruit and milk components.
  - Commercial smoothies can only credit toward the fruit component.

Grains

- All grains offered must be whole grain-rich (WGR).
- At least one ounce equivalent of grains must be menued every day.
  - Meat/Meat Alternate as a substitute for a Grain. After one ounce equivalent of grains is menued, a meat/meat alternate can also be added to the menu which counts towards the grains requirements.
- Breakfast cereals must be fortified.

Fluid Milk

Two types of milk must be offered. Any two types that meet the following criteria are allowed.

- Unflavored, fat-free or low-fat (1%)
- Flavored, fat-free

Whole milk and reduced-fat (2%) milk are not allowed unless there is a student with a medical statement on file. SFAs who are unable to obtain a supply of fluid milk on a continuing basis may be able to use canned or powdered milk.

Meat/Meat Alternates and Vegetables at Breakfast

There is no requirement to serve meat/meat alternates or vegetables for breakfast, however a meat/meat alternate can satisfy part of the required grains component if at least one serving of the grain component has been menued.

Schools can also choose to offer a meat/meat alternate or vegetables as an extra with the menued meal. Extras do not count towards any of the required meal components, but do count towards the calories, sodium, saturated fat and transfat specifications.

Breakfast Calorie Requirements

GRADE	CALORIES
Grades K–5	350-500
Grades 6–8	400-550
Grades 9–12	450-600

Breakfast Requirements Allow for One Menu Plan for All Grades

	Weekly Amount/Range	Daily Minimum
Fruits	5 Cups	1 Cup
WGR Grains	9-10 Oz Eq	1 Oz Eq
Fluid Milk	5 Cups	1 Cup
Min & Max Calories	450-500	—
Saturated Fat (% of Total Calories)	Less than 10%	—
Sodium (mg)[1]	< 540	—
Trans Fat[2]	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.	

The standards for sodium, calorie minimums and maximums, and saturated fat are met based on averages for the week.

[1] Sodium requirements listed are at the SY2016-2017 level.

[2] Products and ingredients used to prepare meals must be trans-fat free (less than 0.5 gram per serving). This only applies to trans-fat added products, not products with naturally occurring trans-fat.

Offer Versus Serve – Breakfast

- Offer vs Serve at breakfast is optional for all grades.
- At least four items must be menued from the three required component areas.
- Student must select three or more food items, one of which must be a fruit.

What Counts as an Item?

COMPONENTS	1 *ITEM* EQUALS
Fruits	1/2 cup
Grains	1 oz eq
Fluid Milk	1 Cup

Fruit Item

One item of fruit is ½ cup. Schools are required to offer at least 1 cup of fruit daily. The 1 cup of fruit offered can come from one fruit, or a combination of fruits. Since one item of fruit equals ½ cup, schools may choose to offer multiple fruits in ½ cup amounts. This would satisfy the USDA requirement to offer at least 1 cup of fruit daily, and would provide multiple items toward the Offer vs Serve requirement to offer at least four items daily.

For breakfast to be creditable under OVS, the student must select at least one fruit.

Schools are allowed to use vegetables to count towards the fruit, but vegetables are not a required component and/or item for breakfast.

Grain Item

One item of grain is 1 ounce equivalent. Menu planners have a choice in how larger grain items, like a muffin or bagel, are classified. If the grain being offered is a 2-ounce equivalent, the menu planner could choose to classify it as one or two items since 1 item of grains is only 1-ounce equivalent.

If the menu planner has chosen to classify a 2-ounce equivalent grain as two separate items, a student selecting it would have two items toward the three item minimum that must be selected to meet the requirements of Offer vs Serve.

Fluid Milk

One serving of milk is 1 cup. There is no requirement under Offer vs Serve for a student to select milk. While schools could offer multiple 1 cup servings of milk, it is not recommended due to the amount of calories milk contributes.

USDA Offer versus Serve Guidance

Additional information related to Offer vs Serve for breakfast and lunch is available at:

- http://www.fns.usda.gov/sites/default/files/SP57-2014a.pdf
- http://www.fns.usda.gov/es/file/9213
- Offer Versus Serve Manual 2015–2016

After-School Snack Program

The After-School Snack Programs that serve children through 18 years of age is now available. The intent of this option is to assist schools in operating organized programs of care that include educational or enrichment activities to help reduce or prevent children's involvement in juvenile crime or other high-risk behavior.

Content of Snacks

Snacks must meet the meal pattern as established in the **National School Lunch Program** regulations. Snacks must contain two different components from the following four:

1. A serving of fluid milk as a beverage, on cereal, or used in part for each purpose.
2. A serving of meat or meat alternate.
3. A serving of vegetable(s) or fruit(s) or full-strength vegetable or fruit juice or an equivalent quantity of any combination of these foods. Juice may not be served when milk is served as the only other component.
4. A serving of whole-grain or enriched bread.

Sweet-type desserts such as cookies, granola bars, or sweet rolls may be used to meet one serving of grain or bread per day. Sweet-type desserts or snacks should not be served as a snack more than twice a week.

Portions for children 13–18 years of age shall be no less than the portions for the 6–12 years of age group. Larger portions should be offered to the older children.

Component	Age 1–2	Age 3–5	Age 6–12
	Select two different components from the four areas listed below.		
Fluid Milk	½ c	½ c	1 c
Meat/Meat Alternate[1]	½ oz	½ oz	1 oz
Fruit, Vegetable, or Juice	½ c	½ c	¾ c
Bread: Enriched or whole-grain bread **Cereal:** Cold, dry or hot, cooked	½ slice ¼ c ¼ c	½ slice ⅓ c ¼ c	1 slice ¾ c ½ c

* Schools **must** offer at least two choices from the following: fat-free flavored, fat-free unflavored, or 1% unflavored.

[1] Yogurt can be used as a meat alternate. Four ounces or ½ cup of plain or sweetened and flavored yogurt equals one ounce of meat or meat alternate.

Local and Traditional Foods

Traditional foods are an important part of Alaska Native culture. Traditional foods are especially good sources of nutrients like protein, iron, and Vitamin A, and are low in saturated fat and sugar.

According to state regulations, traditional wild game meat, seafood, plants, and other food may be donated to a food service of a residential childcare facility, a school lunch program, or a senior meal program provided that certain conditions are met. It is very important to read and apply the Alaska State Food Code Regulations if you intend to accept such a donation.

Donated foods that Child Nutrition Programs can accept:

- Wild game meat in whole or quarters or roasts, no burger or ground meats
- Seafood whole, in rounds, or gutted and gilled from commercial sources only.
- Berries, vegetables, and wild plants.
- Eggs

When accepting donated traditional foods, Child Nutrition Programs need to check that the animal was not diseased and that it was butchered, transported and stored safely and kept cool to prevent spoilage. After the donation is inspected, it should be labeled and cooled or frozen promptly. When preparing for meal service, the food items should be defrosted in the refrigerator. Fish and game donations should be from a commercial source.

Cooking temperature for game meat is 165°F and fish should be cooked to 145°F. Traditional foods that **cannot** be accepted or used in a Child Nutrition Program include:

- Fox meat
- Walrus meat
- Bear meat
- Seal or whale oil, with or without meat
- Fermented game meat (beaver tail, whale or seal flipper, muktuk)
- Fermented seafood (salmon eggs, fish)
- Home canned foods
- Home smoke or dried meats/seafood
- Home vacuum packaged foods
- Shellfish from unapproved sources

For more information on the Alaska Food Code and Traditional Foods please see the Alaska Department of Environmental Conservation at http://dec.alaska.gov/eh/fss/Food/School_Food_Service.html.

For more information on traditional foods in Child Nutrition Programs, see our website at http://education.alaska.gov/tls/cnp/TFDFG.html.

Menu Planning Resources

- *Make it Local: Recipes for Alaska's Children* https://education.alaska.gov/TLS/CNP/cookbook/Make_It_Local_2ndPrinting.pdf
- *Rural Alaska Healthy Menus* https://education.alaska.gov/TLS/CNP/menuresources.html
- *Healthier Kansas Menus* (Cycle Menus and Recipes): http://www.kn-eat.org/SNP/SNP_Menus/SNP_Resources_Healthier_Kansas_Menus_8-week_Cycle_2014-15.htm
- *Home Grown: Menus of Wisconsin* http://fns.dpi.wi.gov/fns_homegrown
- *Iowa Gold Star* (Cycle Menus and Recipes): https://www.educateiowa.gov/pk-12/nutrition-programs/quick-links-nutrition/learning-tools-nutrition/iowa-gold-star-cycle-menus
- *Mississippi Recipes for Success* http://mrs.mde.k12.ms.us/
- S*marter Lunchrooms* http://smarterlunchrooms.org/
- *USDA Food Buying Guide* http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs
- *USDA Food Buying Guide Calculator* http://fbg.nfsmi.org/
- *USDA Mixing Bowl* http://www.whatscooking.fns.usda.gov/search/quantity/im_field_audiences/school-food-service-186
- *USDA Recipes* http://www.theicn.org/ResourceOverview.aspx?ID=115
- *USDA Team Nutrition Healthy Meals Resource System* https://healthymeals.nal.usda.gov/recipes/recipes-school-food-service
- *Vermont FEED* http://www.vtfeed.org/sites/default/files/New_School_Cuisine_Cookbook.pdf
- *Whole Grain Resource from USDA* http://www.fns.usda.gov/tn/whole-grain-resource
- *Vegetable Sub-groups* http://www.choosemyplate.gov/vegetables
- *Offer Versus Serve Manual* http://www.fns.usda.gov/sites/default/files/cn/SP41-2015av2.pdf

Smart Snacks and Competitive Foods

USDA Smart Snacks in School
Revenue from Sale of Competitive Foods

USDA Smart Snacks in Schools

As of July 1, 2014, all schools that participate in the National School Lunch and/or School Breakfast Programs are required to follow standards for all foods and beverages sold outside of or in addition to the reimbursable meal. Items must meet the standards listed below. These standards apply during the school day anywhere on school campus/grounds. A school day is defined as midnight to 30 minutes after the end of the school day.

Foods and beverages that do not meet the following standards may only be sold:

- In the evenings, 30 minutes after the end of the school day;
- On weekends;
- Off campus; or
- On approved exempted fundraising days. See the Alaska's Smart Snack Waiver information at the end of this section.

Nutrition Standards for Foods

Any food sold in schools must:

- Be a "whole grain-rich" grain product; or
- Have as the first ingredient a fruit, a vegetable, a dairy product, or a protein food; or
- Be a combination food that contains at least ¼ cup of fruit and/or vegetable

Foods must also meet several nutrient requirements:

- Calorie limits:
  - Snack items: ≤ 200 calories
  - Entrée items: ≤ 350 calories
- Sodium limits:
  - Snack items: ≤ 200 mg
  - Entrée items: ≤ 480 mg
- Fat limits:
  - Total fat: ≤35% of calories
  - Saturated fat: < 10% of calories
  - Trans fat: zero grams
- Sugar limit:
  - ≤ 35% of weight from total sugars in foods

Nutrition Standards for Beverages

All schools may sell:

- Plain water (with or without carbonation);
- Unflavored low fat milk;
- Unflavored or flavored fat free milk and milk alternatives permitted by NSLP/SBP;
- 100% fruit or vegetable juice; and
- 100% fruit or vegetable juice diluted with water (with or without carbonation), and no added sweeteners.

Elementary schools may sell up to 8-ounce portions.
Middle schools and high schools may sell up to 12-ounce portions.
There is no portion size limit for plain water.

High schools may sell additional "no calorie" and "low calorie" beverage options:

- No more than 20-ounce portions of:
  - Calorie-free, flavored water (with or without carbonation); and
  - Other flavored and/or carbonated beverages that are labeled to contain < 5 calories per 8 fluid ounces or ≤ 10 calories per 20 fluid ounces.
- No more than 12-ounce portions of:
  - Beverages with ≤ 40 calories per 8 fluid ounces, or ≤ 60 calories per 12 fluid ounces.
- In a K–12 school, beverages sold must meet the most restrictive age/grade requirements, unless the school is able to ensure separation of students and beverage sales by grade. (For example, although high school students may be allowed a 12-ounce serving, if the district cannot restrict access to elementary students in a K–12 setting, then only 8-ounce serving sizes should be sold.)

Other Requirements

Fundraisers

- The sale of food items that meet nutrition requirements at fundraisers is not limited in any way under the standards.
- The standards do not apply 30 minutes after the end of the school day, on weekends and at off-campus fundraising events.
- The standards provide a special exemption for infrequent fundraisers that do not meet the nutrition standards. State agencies may determine the frequency with which fundraising activities take place that allow the sale of food and beverage items that do not meet the nutrition standards. See the Alaska's Smart Snack Waiver information at the end of this section.

Accompaniments

- Accompaniments such as cream cheese, salad dressing and butter must be included in the nutrient profile as part of the food item sold.
- This helps control the amount of calories, fat, sugar and sodium added to foods by accompaniments, which can be significant.

Alliance for A Healthier Generation Smart Snacks Product Calculator

The calculator is designed to help school food service quickly and easily determine which products meet the USDA standards.

- Smart Snacks Product Calculator

Exempted Fundraising Days—Alaska's Smart Snack Waiver Form

Annually, a participating NSLP/SBP school may have no more than the number of exempted fundraising days as listed below.

The number of exempted fundraising days shall be limited to:

- Grades 8 and below, 10 days per school year
- Grades 9 through 12, 25 days per school year

The provisions listed above do not limit the number of foods and beverages that may be sold to students on an exempted fundraising day.

In order to have exempted fundraising days, a participating school must apply for and receive an Alaska Smart Snack Waiver. The waiver request form can be found here: https://education.alaska.gov/TLS/CNP/competfoods.html

Revenue from Sale of Competitive Foods

School food service account funds are intended to purchase food for reimbursable meals. The Healthy Hunger Free Kids Act of 2010 established requirements for school district revenue when foods sold outside of reimbursable meals are purchased with school food service account funds. The purpose of the Non-Program Revenue requirement is to ensure revenues from the sales of non-program foods cover food cost in the SFA food service account.

Non-Program food includes, but is not limited to:

- a la carte items
- Adult meals
- Fundraisers
- Vending machines
- Seconds of entrée items (not fruits or vegetables)

SFAs are required to ensure that:

- All revenue from the sale of non-program foods accrues to the non-profit school food service account; and
- Revenue available to support the production of reimbursable school meals does not subsidize the sale of non-program foods.

Non-program foods include any non-reimbursable foods and beverages purchased using funds from the nonprofit school food service account. This encompasses all foods sold in schools as well as adult meals, foods sold outside of school hours, or any foods used for catering or vending activities. For the majority of SFAs, a la carte foods offered during meal service account for the largest share of non-program foods.

SFAs are required to determine if the percent of total revenue that is generated from their non-program food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of non-program foods. For example, if the costs of non-program food are 25 percent of the SFA's total food costs, then the amount of revenue generated from the sale of these non-program foods should be at least 25 percent of the total revenue in the school food service account.

When nonprofit school food service account funds are used to provide goods and services (e.g., catering and vending) for outside entities such as the superintendent's office, school board, or student clubs, there are two separate transactions that occur. The first transaction is between the school food service and the outside entity, which is typically associated with the school district but separate from the school food service, and the second transaction is between the outside entity and its customers. The school food service may provide goods and services to the outside entity only

if all costs, including labor and any other costs incurred, are covered by the entity being served by the school food service operations (the first transaction). Any revenue generated through the second transaction between the outside entity and its customers may be kept by the outside entity. For example, an SFA may use nonprofit school food service account funds to purchase and prepare hamburgers for the Parent Teacher Association (PTA) which runs a high school concession stand during football games. If the cost associated with purchasing and preparing the hamburgers is $2 per hamburger, the SFA must recoup at least $2 per hamburger from the PTA; the PTA may then sell each hamburger for $3 and keep the $1 profit per burger.

SFAs providing goods and services to outside entities are strongly encouraged to develop a written agreement with the outside entity that identifies costs and any other responsibilities, as applicable. The agreement must include a stipulation that all risk relating to revenue losses must be covered by the outside entity and not the school food service. For example, if the PTA is purchasing the hamburgers in the example above is unable to sell them due to the game being cancelled, the PTA is still responsible for reimbursing the food service the costs associated with the purchase and any labor that was involved in the SFA's preparation of the hamburgers.

Program regulations do not restrict revenues earned from the sale of competitive foods that are purchased with funds outside of the nonprofit school food service account, i.e. the general fund. However, remember that to the extent such foods are sold on the school campus during the school day, the "Smart Snack" requirements apply.

Pricing

The simplified approach, while still requiring SFAs to separate their non-program food costs from their program food costs, allows SFAs to select a reference period by which compliance will be assessed. Rather than separating all costs for the entire year, SFAs will separate their non-program food costs from their program food costs for a period of at least 5 consecutive operating days (or 4 consecutive days for schools that only operate 4 days).

SFAs must be able to show that the percentage of non-program revenue generated is at least as great as the percentage of non-program food costs incurred during the reference period; SFAs with the capacity to obtain separate non-program and program food cost and revenue data for a period longer than 5 consecutive days (e.g., monthly, annual, biweekly) are strongly encouraged to use data from the longer period to perform the assessment. All revenue and cost data used to assess compliance must reflect the same reference period.

The revenue ration must be great than or equal to the food costs ratio, as follows:

$$\frac{\text{Non-program food revenue}}{\text{Total program \& non-program revenue}} \quad \frac{\text{Total non-program food costs}}{\text{Total program and non-program food costs}}$$

Student Eligibility

Certification of Eligibility
Household Eligibility Application
Direct Certification
Confidentiality/Disclosure of Information

Certification of Eligibility

Student Eligibility covers the basic requirements that must be addressed by SFAs in the application process for students to receive Free or Reduced-Price meals. USDA provides a full manual on this process which is available on our website, please see "Eligibility for School Meals" at https://education.alaska.gov/TLS/CNP/NSLP.html.

Public Announcement

Near the beginning of each school year, the public must be notified that the National School Lunch Program, School Breakfast Program, and/or the Special Milk Program are available at the school or school district. This notice must include the Income Eligibility Guidelines for free and reduced-price meals and/or free milk. The public announcement must be provided to the local news media or hung in a public area like the local post office or grocery store.

When submitting a public announcement for print, LEAs should request the announcement be free of charge. Copies of the public announcement must be made available upon request to any interested person. A prototype is available online at: https://education.alaska.gov/tls/cnp/NSLP2.html.

Carryover of Previous Year's Eligibility

Schools are required to carry over eligibility determinations based on direct certification, categorical eligibility determinations and household eligibility applications from the previous year for either 30 operating days into the subsequent school year OR until a new eligibility determination has been made, whichever comes first. Carryover of the eligibility status from the previous year also applies to children in Head Start programs if the SFA administers both the Head Start Program and the school in which the child attends kindergarten. Carryover also applies to newly enrolled children from households with children who were approved for benefits within the same LEA in the previous school year.

If benefits provided to a student during the first 30 operating days of the school year based on the eligibility from the prior school year expire, a notice of adverse action is not required.

However, an LEA should provide some notification to such families.

Letters to Households

Prior to the distribution of the household eligibility applications (HEAs) to students in all participating NSLP schools, each LEA is required to implement direct certification. Please reference the **Direct Certification** section of this chapter for detailed information about that process and requirements.

Near the beginning of each school year, the letter to household, household eligibility application and application instructions announcing the availability of nutrition pro-

grams must be distributed to all households, EXCEPT students that are directly certified or in a school participating in Community Eligibility Provision (CEP) or Provision 3. Distribution of the applications may occur by mail, email, or in materials provided directly to the students or households.

Most schools utilize a paper HEA process, and as such, each household must either be provided the notification of benefits due to direct certification or be provided a paper HEA with letter to household and instructions included. It is not acceptable to post the HEA on a school district's website only and require households to download and print the HEA for submission; while this is allowable, a paper HEA must still be distributed to all households not directly certified.

If the LEA uses a computer or web-based system to receive and process applications, the letter must inform the household how to access the system in order to apply for benefits. The application and instructions are not required to be distributed if the LEA accepts the required information online and approves the applications via this system. Information about electronic applications must be reviewed by LEAs to ensure compliance with all USDA requirements prior to implementation. The letter must explain to the household how to obtain and submit a paper application; the letter must include a telephone number or provide a form to request paper application.

Alaska Child Nutrition Programs does offer a free, online application for all districts to use in the PrimeroEdge software system. If other software is used to perform all or part of the application, certification, or verification process, the LEA must submit the software specifications to the state agency for approval and assure the software used is performing correctly and meets all program requirements.

LEAs are currently assisting Limited English Proficient (LEP) families as required under Title 6 of the Civil Rights Act of 1964. Under Title 6, LEAs have a responsibility to be aware of the language needs of LEP households and ensure these households have access to the same information other parents have in a manner they can easily understand. LEAs are reminded that free and reduce price application materials can easily be included along with educational materials that are provided to LEP families under the requirements of Title 6.

Translated HEA materials are available online through the USDA website at http://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals. *Please note USDA's translated materials do not include Permanent Fund Dividend (PFD) information which must be included.*

All household letter prototypes, the application, and instructions are updated annually and made available on our webpage at https://education.alaska.gov/tls/cnp/NSLP2.html. If a LEA elects not to use the state issued prototypes, the LEA developed forms must be preapproved by Alaska Child Nutrition Programs.

Eligibility Documents and Timelines

For each student served a meal or milk that is claimed for federal reimbursement at the free or reduced-price rate, the LEA must have the proper documentation on file per program requirements. Proper documentation includes one of the following:

- a completed HEA
- Direct Certification report indicating the child receives SNAP, TANF, FDPIR or Foster child status
- Documentation that they are a member of a household in which a child or adult is receiving SNAP, TANF, or FDPIR
- Categorical Eligible roster from the district's homeless/runaway/migrant/Head Start/foster child coordinator or director

Applications should be processed immediately, particularly for students who do not have approved applications on file from the previous school year. The household must be notified of the approval or denial of the application as soon as possible, and no later than ten working days from receipt of the application. If the HEA is approved, the notification may be verbally or in writing. If the HEA is denied, the notification must be in writing. A prototype Denial/Approval Notification Letter located under the Household Application for School Meals Template should be used.

Effective Date of Eligibility Determinations

Children are eligible for free or reduced-price meal benefits on the date the household application is approved. However, LEAs have flexibility concerning the effective date for benefits. If an LEA chooses, it could establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves it. A date stamp must be used when this flexibility is applied to the application process.

Eligibility for free and reduced-price school meals remains in effect for the rest of that school year. Households are not required to report changes in their eligibility status. However, households may voluntarily report a change. If a reported change reduces or terminates benefits, the LEA must contact the household and explain to the household that the change does not have to go into effect. If the household wants the change to go into effect, the LEA must provide a notice of adverse action.

Year-long eligibility does not apply when the initial eligibility determination was incorrect. This may occur if there was:

- A determination error,
- Verification of household eligibility that results in a required benefit change. This may be due to a response that does not support the level of benefits for which the household was approved or a non-response by the household,
- A household voluntarily reapplies for meal benefits, as their situation has changed.

Certification of Eligibility

Benefits can be issued using one of following methods:

1. Categorical Eligibility via the Direct Certification System (PrimeroEdge)—**students receiving Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance to Needy Families (TANF), and Food Distribution Program on Indian Reservations (FDPIR)** including the extension of such benefits to all household members as applicable. (This is discussed in greater detail in the Direct Certification section of this handbook.)
2. Categorical Eligibility—homeless/migrant/runaway/Head Start listing from local coordinator
3. Household Eligibility Application
   a. Based on household income
   b. Based on valid SNAP, TANF or FDPIR case numbers provided on the application including the extension of such benefits to ALL household members

Categorical Eligibility

Homeless, Runaway, Migrant, and Head Start

Homeless, runaway, migrant, and Head Start students are categorically eligible to receive free meals in the NSLP and SBP. Documentation to substantiate free meal

eligibility must consist of the student's name or a list of names; effective date; and the signature of the person providing documentation such as a homeless education liaison, local shelter director, runaway and homeless youth service provider, a local migrant education coordinator, or Head Start director. Beginning school year 2016–2017 the PrimeroEdge system will include migrant student information on the monthly Direct Certification list uploads.

Foster Children

Foster children are categorically eligible to receive free meals in the NSLP and SBP. If a family marks "foster child" on the HEA, this status must be confirmed prior to certification of free meals benefits (by an appropriate official for the foster care program). Foster children could also be included on an income or SNAP/TANF application for the household in which they reside. The foster child would be eligible for free meals, the remaining children in the household would have their meal benefit level based on: either income and the total number of members in the household including the foster child(ren) or a SNAP/TANF/FDPIR case identification number. Foster children are also included on the monthly PrimeroEdge Direct Certification lists.

Household Eligibility Application

LEAs are required to use HEAs. This means only one application from each household may be required. LEAs are prohibited from requesting separate applications for each child in cases where children attend different schools under the same LEA.

There are two types of Household Eligibility Applications: SNAP/TANF/FDPIR or income. Each will be discussed in detail below.

SNAP/TANF/FDPIR Application

Due to the federal requirements for Direct Certification, LEAs should make every effort to utilize Direct Certification to its maximum potential. The Direct Certification process should maximize child benefits and minimize the number of HEAs a district receives from eligible households.

If a household is receiving SNAP, TANF, or FDPIR but the student(s) is not on the direct certification list, the HEA must include the following information:

- Student's name for whom the application is submitted
- Signature of adult household member
- Valid SNAP, TANF, or FDPIR case number of a member of the household (adult or child)

Anytime an application is received with a case number the LEA must see if the students on the application are located on a Direct Certification list. If the students are not located on the Direct Certification lists, then the LEA should contact their local public assistance office for validation.

Income Application

An HEA with reported income must include the following information on the application:

- Names of all household members, including the student(s), with an indication of the school for whom the application is submitted
- Current income information for each household member listing source of income such as wages, alimony, pension, worker's compensation, etc., and the frequency in which the income is received
- Signature of adult household member
- The last four digits of the social security number of the adult household member who signed the application or an indication that the household member does not have one.

If applications are complete, they are to be accepted at "face value" and are not subject to up- front verification. If there are any inconsistencies regarding the eligibility information provided or information that is missing, the HEA must be denied unless all inconsistencies are resolved or information is provided. Any HEA that is missing required information cannot be processed.

The LEA should make reasonable efforts to contact the household in order to obtain or clarify the required information.

Determining Household Size

For purposes of determining eligibility benefits for the Child Nutrition Programs, a household is defined as a group of related or unrelated individuals, who are not residents of an institution or boarding house, but who live as one economic unit, and who share housing and/or significant income and expenses of its members. Generally, individuals residing in the same house are an economic unit. However, more than one economic unit may reside together in the same house.

Separate economic units in the same house are characterized by prorating expenses and economic independence from one another. A foster child residing in a household may be included on the HEA and count as a household member for determining meal benefits.

Income Eligibility

To determine if a household meets income eligibility requirements for benefits, school officials must compare the household size and the total household gross earned income (without deductions) to the current Income Eligibility Guidelines (IEGs). These are updated annually and made available on our website with the application packet.

If the household has only one income source, or if all sources are received in the same frequency (weekly, every two weeks, bi-weekly, monthly, or annually), no conversion factor is used. Compare the income or sum of the incomes to the published IEGs for the household size and frequency of pay to make the eligibility determination.

If the household reports income sources at more than one frequency (weekly, every two weeks, bi-weekly, monthly, or annually), the income needs to be converted. When income needs to be converted, all income must be converted to an annual total.

The conversion factors that must be used are as follows:

- Weekly x 52
- Every 2 Weeks x 26
- Twice a Month x 24
- Once a Month x 12

Do not round the values resulting from each conversion. Total all converted annual income as indicated on the application and then compare to the IEGs.

It important to remember the Permanent Fund Dividend (PFD) is considered income and must be included on the HEA. The date that the HEA is received by the LEA will determine which PFD should be used on the application. If the LEA received the HEA on or before December 31 the LEA would use the previous year PFD amount, if the LEA received the HEA on or after January 1 the LEA would use the current year PFD amount. For example:

- 2014–2015 PFD amount was $1,072.00, and 2015–2016 PFD amount is $2,072.00
  - If the HEA was received on or before December 31, 2015, then the LEA would apply the 2014–2015 PFD amount
  - If the HEA was received after January 1, 2016, then the LEA would apply the 2015–2016 PFD amount

For all applications, the determining official must indicate category of eligibility (free, reduced- price, or paid), and sign and date the application. The household is notified of their eligibility. If a HEA is above income, the household must be notified in writing and such notice must include the reason for the denial of benefits, the right to appeal, instructions on how to appeal, and a statement that the household may re-apply for free or reduced-price benefits at any time during the school year.

Direct Certification

Direct Certification is the federally mandated process that LEAs must use to determine children eligible for free benefits based on documentation obtained directly from appropriate State or local agencies or other authorized individuals. Direct certification of a child's eligibility status should not involve the household. The communication exchange should be between an appropriate agency and the State agency, LEA, or school.

Definitions of Direct Certification:

DIRECT CERTIFICATION: Determining children eligible for free benefits based on documentation obtained directly from appropriate State or local agencies or other authorized individuals. Direct certification of a child's eligibility status should not involve the household. The communication exchange should be between an appropriate agency and the State agency, LEA, or school.

DIRECT CERTIFICATION FOR ASSISTANCE PROGRAMS: A process conducted through an electronic match between the Assistance Program and the State agency or LEA. No application is necessary. Letters from TANF and FDPIR agencies submitted by households are considered direct certification. However, direct certification for SNAP households must be conducted using an automated data match process. If a household provides a SNAP eligibility letter to the LEA or school, the letter must be used to establish eligibility, but it is not considered direct certification for reporting purposes.

- **SNAP**: Supplemental Nutrition Assistance Program
- **TANF**: Temporary Assistance for Needy Families
- **FDPIR**: Food Distribution Program for Indian Reservations

DIRECT CERTIFICATION FOR OTHER SOURCE CATEGORICALLY ELIGIBLE PROGRAMS: A process conducted through an automated data match between appropriate State or local agencies and officials from Other Source Categorically Eligible Programs, such as the LEA's homeless liaison. Direct certification may also be conducted using lists of eligible children provided to the State or LEA from appropriate officials of these programs. Letters and contacts from program officials may also be used as direct certification.

Extension of Benefits

Any child or household member's receipt of benefits from an Assistance Program may be extended to eligibility for free benefits to all children who are members of the household in some circumstances.

1. **Participation in Assistance Programs**: A child or any member of the household receives benefits from SNAP, FDPIR, or TANF, as determined either through direct certification or an application with the appropriate case number. These benefits are extended to all children in the household.
2. **Other Source Categorically Eligible designation**: A child is documented as meeting the applicable definition, as defined in this section, as homeless, runaway, or migrant; foster child, or enrolled in a federally-funded Head Start. These benefits may not be extended to other children in the household.

Direct Certificaition Process

The automated Direct Certification process is two separate steps:

1. LEA provides current enrollment data to CNP through State Report Manager (no less than twice per year October and March, but more frequent data improves LEA match rates).

   CNP provides matched and unmatched student data to LEAs via PrimeroEdge software and notifies districts monthly when the new data can be accessed.

2. LEAs access and/or download student data no less than one time per month after CNP notification. This will have matched and unmatched student data. Unmatched students are those who appear to live in the boundaries of the LEA but the state could not confirm. LEAs review the unmatched students to see if they are able to match them with their current enrollment.

Step 1: Enrollment Data via State Report Manager (SRM)

The Department of Education and Early Development established a data collection process to transfer current enrollment information into PrimeroEdge. This collection streamlines the Direct Certification process for school districts. It also simplifies eligibility determinations for Community Eligibility Provision (CEP) school districts.

This data collection differs from OASIS submission as it requires slightly different fields. We cannot substitute or accept the OASIS submission for the Direct Certification matching process.

Submission is via the State Report Manager (SRM), information on SRM including the upload template and handbook can be located on the CNP website at https://education.alaska.gov/TLS/CNP/primero.html.

Student enrollment data should be submitted by districts no less than the following dates:

- at the beginning of the school year (suggested)
- before October 1—for verification and carryover purposes (required)
- each Spring before April 1—for CEP purposes (required)
- when new students enroll or transfer from a different district (suggested)

The student match rate will only be as good as your latest SRM.

Step 2: Accessing Directly Certified Students via PrimeroEdge

Due to the confidential nature of the Direct Certification lists only authorized individuals and school administrators should have access. Therefore, PrimeroEdge users are required to submit a User Authorization form to Child Nutrition Programs to obtain a user name and password. Forms can be located on the State Child Nutrition Homepage under Program Links/PrimeroEdge.

Access PrimeroEdge at: https://schoollunch.education.alaska.gov/Production/dashboard.aspx

All matched students must be updated in the Benefit Issuance Document (see Eligibility section) and the family must receive a letter advising them of a change in status —LEAs have 10 days from the CNP notification to process the DC list each month. LEAs with pricing programs must access the Direct Certification list no less than one time per month. LEAs that are participating in the Community Eligibility Provision must access the Direct Certification list to certify Identified Student Particiaption (ISP), and should check it annually to see if the ISP has increased.

For tutorials on the SRM process or PrimeroEdge process, please see our website at https://education.alaska.gov/TLS/CNP/primero.html

Confidentiality/ Disclosure of Information

The LEA may disclose aggregate program data to any program or individual (such as the number of children eligible for free or reduced-price meals). Collectively gathered information does not identify individual children, therefore parental notification and consent are not needed.

Information provided on the HEA is used only for determining eligibility for meal or milk benefits and verification of eligibility. SFAs may disclose children's free and reduced-price meal eligibility information to programs, activities, and individuals as specified in the chart on the next page. This is an option, not a requirement.

Although a program or person may be authorized under the National School Lunch Act (NSLA) to receive free and reduced price eligibility information, there must be a legitimate "need to know" basis to provide a service or carry out an authorized activity. State agencies, LEAs, and schools must ensure that data systems, records, and other means of accessing a student's eligibility status are limited to officials directly connected with administration or enforcement of a federal or state program or activity. This includes Federal, State, or local program operators responsible for the ongoing operation of the program or activity, or responsible for program compliance.

Eligibility information cannot be made available to all school officials. For example, access must be limited to a student's teachers who are directly responsible for the administration of a federal education program, (e.g., Title I), or who are providing tutorial or other assistance under that program. Teachers, guidance counselors, principals, etc. who are not providing such assistance under the appropriate statutory or regulatory requirements cannot have access to this confidential data. On-line data systems must have a masking or redacted identification capability to prevent unauthorized access to free or reduced-price eligibility status.

SFAs that plan to disclose a child's eligibility status for purposes other than determining and verifying free or reduced-price eligibility must inform the child's household of this potential disclosure. Additionally, in some cases, the SFA must obtain parental consent prior to the disclosure.

USDA Disclosure Chart

Recipient of Information	Information That May Be Disclosed to Recipient
Programs under the National School Lunch Act (NSLA) or Child Nutrition Act (CAN)	All eligibility information
Federal, State, or local law enforcement officials investigating alleged violations of any programs under the NSLA and CNA or investigating violations of the programs authorized to have access to names and eligibility status	All eligibility information
Comptroller General of the United States for purposes of audit and examination	All eligibility information
Medicaid or the State Children's Health Insurance Programs (SCHIP) administered by a state or local agency authorized under Titles XIX or XXI of the Social Security Act, to identify and enroll eligible children	All eligibility information, unless parents elect not to have information disclosed. Must give prior notice to parents and opportunity for parents to decline to have their information disclosed.
Federal/State or local means tested nutrition programs with eligibility standards comparable to the NSLP	Eligibility status only
Federal education programs	Eligibility status only
State education programs administered by a State agency or local education agency	Eligibility status only
State health programs other than Medicaid/SCHIP, administered by a state agency or local education agency	Eligibility status only
Local education programs	No eligibility information unless parental consent is obtained
Federal health programs other than Medicaid/SCHIP	No eligibility information unless parental consent is obtained
Local health program	No eligibility information unless parental consent is obtained

Direct Certification Resources

USDA Eligibility Manual https://education.alaska.gov/TLS/CNP/pdf/EligibilityManual-forSchoolMeals.pdf

Eligibility for School Meals DEED eLearning Module https://education.alaska.gov/eLearning/courses.html

Benefit Issuance, Meal Counting and Claiming

Benefit Issuance
Meal Counting and Claiming
Point-of-Service Meal Counting Systems
Edit Check Worksheets

Benefit Issuance

The benefit issuance process documents or determines how students are claimed on a daily basis. The benefit issuance document communicates the approved category (free, reduced-price, and paid) for each student based on an approved Household Eligibility Application, Direct Certification list, homeless and/or migrant liaison list, Head Start list, Even Start list, non-applicants approved by local officials, or another approved method. Listed below is an example of a benefit issuance documents/roster.

Sample Benefit Issuance Document (BID)

Goode School Benefit Issuance Document School Year 2015-2016

					Change in Benefits issued			
ID #	Name	Middle I	Grade	Status	Free	Reduced	Paid	Comments
3568	Flintstone, Freddie		5	F				DC List July
3569	Cleaver, Theodore	Q	4	F				application
3570	Darling, George	S	6	P				no application on file
3571	Mouse, Mickey	A	7	R				application
3572	Mouse, Minnie	B	6	R				application
3573	Hood, Robin	J	7	R	Nov			application Aug -Oct - DC List November
3574	Fudd, Elmer	S	11	F				DC List July
3575	Jones, Freddie		6	P				over income application
3576	Taylor, Opie	C	6	P				over income application
3577	Peppermint, Patty		8	F				Public Assistance Letter
3578	Oyl, Olive		8	P				no application on file
3579	Kent, Clark	R	4	F				DC List July
3580	Bell, Tinker	I	4	F				application
3581	Boop, Betty	B	1	F				DC List July
3582	Brown, Charlie	R	1	R				application
3583	Jetson, Elroy	T	4	F				Migrant List
3584	Dick, Tracy	T	2	F				DC List July
3598	Rich, Richie	A	7	P				no application on file
3599	Quest, Johnny	E	3	F				Migrant List
3600	Pan, Peter	A	12	F				DC List July
3601	Duck, Daisy		6	F				DC List July
3602	Tiger, Tony		4	R				application
3603	Rubble, Barney	T	4	F				Public Assistance Letter

Benefit issuance documents must be updated when a change occurs on a student's approved benefits. Here are a few examples of changes to the approved eligibility that require benefit issuance updates:

- Verification findings
- Student appeared on a direct certification list
- Student transfers
- Household's decision not to receive meal benefits
- Change in household size, income, or receipt of SNAP/ TANF/FDPIR benefits by any member of the household that would increase the meal benefits

When a change in benefits occurs that increases meal benefits (paid to free, paid to reduced- price, or reduced-price to free), the SFA must notify the household and change the benefits of all children in the household no later than three operating days from the time of the new determination. When a child changes from free by HEA to free by Direct Certification, no notification must be sent to the family, but the Benefit Issuance Document must be updated. Anytime that benefits are free due to Direct Certification, that benefit must be updated. If a child is on multiple Direct Certification lists, SNAP benefits are required to the benefit type listed.

When a change in benefits is decreased or terminated (free to paid, reduced-price to paid, or free to reduced-price) the SFA must notify the household and provide ten calendar-days written notice in advance of the change. The first day of the ten-calendar-day advance written notice is the day the notice is sent.

Computer-based benefit issuance database(s) must contain the most current approved eligibility information. Computer systems may contain more than one database of approved student eligibility statuses. A system with one database may have multiple sites entering eligibilities that instantaneously update and reflect the changes of a student's eligibility status. One database removes the potential for errors between multiple databases.

Meal 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 served FREE, REDUCED-PRICE, and PAID claimed for reimbursement must have adequate documentation on file to support the claim.

Elements of an acceptable counting and claiming system include:

1. **Eligibility Documentation**

   The SFA must have documentation to claim free or reduced-price meals for reimbursement. Documentation can be a Household Eligibility Application, Direct Certification list, homeless and/or migrant liaison list, Head Start list, Even Start list, FDPIR, non-applicants approved by local officials or another approved method.

2. **Collection Procedures**

   The SFA must prevent overt identification with the medium of exchange to keep students' eligibility for free or reduced-price meals confidential.

3. **Point-of-Service Counts**

   Meals must be counted daily at that point in the food service line where it can be determined that a reimbursable meal, containing all required components, has been served to an eligible student. It is not recommended that a student take point-of-service counts. Rather, it is preferred that a trained adult, school employee, or volunteer take the counts.

   Any alternative point-of-service counting methods must be approved by Alaska Child Nutrition Programs.

   Meal count systems that are not acceptable include the following:

   - Attendance, tray, classroom, delivery, or entrée counts
   - Cash converted to meals
   - Category/cash back-out system
   - Counts taken anywhere other than the point of service, such as the beginning of the service line
   - Counts of tickets sold and distributed
   - All cash line

Use of Biometric Information for meal counting systems that use fingerprints, hand geometry, voice or facial recognition, or any other student biometric information, Public Act 095-0232 requires the SFA to adopt a policy with the following items:

- Written permission to collect biometric information from the individual who has legal custody of the student, or from the student if he or she has reached the age of 18. Failure to provide this written consent must not be the basis for refusal of any services otherwise available to the student.
- The discontinuation of use of a student's biometric information when the student graduates or withdraws from the school district, or if a written request for discontinuation is provided to the school by the individual who has legal custody of the student, or by the student if he or she has reached 18 years of age.
- The destruction of all of a student's biometric information within 30 days after the biometric information is discontinued through graduation, withdrawal, or a written request for discontinuation.
- The use of biometric information solely for identification or fraud prevention.
- A prohibition on the sale, lease or other disclosure of biometric information to another person or entity, unless consent is obtained from the individual who has legal custody of the student, or from the student if he or she has reached 18 years of age, or the disclosure is required by court order.
- The storage, transmittal, and protection of all biometric information from disclosure.

4. **Reports**

The numbers 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 for Reimbursement.

Meal Count Edit Check—the SFA must evaluate the meal counts for each site prior to submission of the Claim for Reimbursement. The edit check worksheets, found later in this section, will help identify and prevent errors in recording and consolidating meal counts.

- The process compares the daily number of free, reduced-price and paid lunches claimed for each site to the following:
  - Highest number of eligible students by category
  - Attendance-adjusted eligible for each category
- The edit check worksheet 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.
- It is required that edit check worksheets are completed each month for sites participating in NSLP and they may be used for other programs.
- When completing the edit check worksheet, normal rounding rules do not apply. Do not round up; leave the decimal if one should occur during calculations. SFAs cannot be reimbursed for a portion of a meal.
- The SFA shall promptly follow-up through phone contact, on-site visits or other means when the internal controls used by the school(s) or SFA for the claims process indicate the likelihood of meal count problems. When problems or errors are identified, the meal counts shall be corrected prior to submission of the monthly Claim for Reimbursement. Improvements to the meal count system shall be made to ensure that the meal counting system consistently results in meal counts of the actual number of reimbursable free, reduced-price, and paid meals served for each day of operation.

5. **Claim for Reimbursement**

The monthly Claim for Reimbursement is submitted electronically by the SFA to the Alaska Child Nutrition Programs. The staff member submitting a claim for reimbursement in the CNP Web must have a signed User Authorization on file with CNP. It is the responsibility of the authorized representative to ensure all policies and procedures (i.e. Edit Check Worksheets) and internal controls (on-site visits) are implemented to ensure the Claim for Reimbursement is accurate and supported by documentation.

6. **Internal Controls**

The SFA must establish internal controls to ensure an accurate Claim for Reimbursement has been made. Here are a few examples of internal controls:

- Segregation of duties
- On-site visits
- Reconciliation of production records to meals

Replacement of Meal Counting and Claiming Methods

Meal counting can use different methods of transaction modes including:

- Tickets
- Tokens
- Bar code cards
- Student identification cards

Students may misplace or lose tickets, identification cards, etc. The USDA has issued specific instructions (FNS Instruction 765-7, Revision 2) regarding lost, stolen, or misused benefit issuance documentation. The purpose of this guidance is to assist sponsors in developing or revising district/school policies while ensuring compliance with federal regulations.

Benefit issuance may be communicated through an identification card that has multiple purposes, such as a school identification card. Below are specific questions and answers addressing automated cards and replacement costs, from USDA.

Question: May a student who has lost an automated meal card be required to pay to replace it before receiving any more reimbursable meals?

Answer: No. A lost meal card is treated the same way as a lost meal ticket. School food authorities are to follow the policies in FNS Instruction 765-7, Revision 2, "Handling Lost, Stolen, and Misused Tickets." A free, reduced-price, or paid meal must be served, in accordance with the rules in the Instruction. If it is impractical to supply the student with an immediate replacement, then special meal arrangements should be made. As is stated in fiscal year 1994 School Programs Memorandum #3, "Recourse for Schools When Money Is Owed to the Food Service Account," school officials must provide reduced-price or paid meals to eligible children if they have money in hand to pay for the current meal.

Question: What is the maximum charge for a replacement meal card or ticket?

Answer: The USDA sets the maximum charge at the cost of one paid meal. However, if the card has multiple uses in addition to the purchase of meals—for example, it is a student activity card—this limit does not apply.

Overt Identification and How to Prevent It

A system for claiming meals must prevent overt identification. This means the eligibility category of any child must be protected and known only by those school officials who deal directly with the counting and claiming system.

Codes on tickets or rosters are one method of preventing overt identification. A code must be difficult to recognize, but not so confusing that the person taking the meal count has difficulty identifying the category for reimbursement.

Some codes are prohibited by the USDA because they are too easily recognizable and therefore allow overt identification. These include the actual words "free," "reduced-price" and "paid" or the use of the letters "F," "R" or "P." In addition, the use of different colors for different designations is also prohibited. A single symbol code such as A, B, C or 1, 2, 3 is not recommended either. The multiple use of the same symbol such as AAA, BBB, or CCC is also not recommended.

Recommended codes are as follows:

- Codes by series—Use of four- or five-digit numbers in a series. For example, 1000–1999 for FREE, 2000–2999 for REDUCED-PRICE, and of 3000–3999 for PAID.
- Codes by student identification number—Use of the last digit of a student's identification number to represent the appropriate eligibility category. For example, use a number ending in zero to reflect free, those ending in an odd number represent reduced-price, and those ending in an even number represent paid.
- Codes by variations—Vary the placement of the students' enrollment dates or other items. For example, 10/2/12 could represent FREE, 10-2-12 could represent REDUCED-PRICE, and 10.2.12 could represent PAID.
- Codes by subtle differences—Use different print styles, spacing, or underline a different part of the student's name or other information to represent different categories. For example, underlining the student's last name might represent FREE, underlining the whole name might represent REDUCED-PRICE, and underlining the first name might represent PAID.
- Codes by number of digits—vary the length of coded numbers by category. For example, FREE is represented by four-digit numbers, REDUCDED-PRICE by five-digit numbers and PAID by six-digit numbers.
- Roster (also known as a checklist, master list or lunch list) codes—are used to take the count in the lunch room may also be coded in any of the above ways. A coded roster aids in counting the daily number of FREE, REDUCED-PRICE and PAID meals served per classroom, so spaces for these daily numbers must be allowed on the roster.

Point-of-Service Meal Counting System

Answer the following questions about your meal counting system. If the answer to any of these questions is YES, your counting system is **NOT** acceptable and must be revised.

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**?
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 back-up system available (e.g., **checklists** for persons not familiar with the students)?
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?

For additional training SFA can go to the eLearning web page at: https://education.alaska.gov/ELearning/ and go through the Point of Service trainings.

Edit Check Worksheet District: _____

1) Schoo Name:				**2)** Total Days of Operation:				**3)** Attendance Factor(AF):		94.4	(circle or X) Breakfast
4) Month:				**5)** Eligible a) Enrolled:			b) Other:		c) Total:	0	Lunch X
6	**7**	**8**	**9**	**10**	**11**	**12**	**13**	**14**	**15**	**16**	**17**
Day	Free Elig	FE x AF	Free Count	Red Elig	RE x AF	Red Count	Paid Elig	PE x AF	Paid Count	Daily Count Totals	Comments (attach if necessary)
1		0			0			0		0	
2		0			0			0		0	
3		0			0			0		0	
4		0			0			0		0	
5		0			0			0		0	
6		0			0			0		0	
7		0			0			0		0	
8		0			0			0		0	
9		0			0			0		0	
10		0			0			0		0	
11		0			0			0		0	
12		0			0			0		0	
13		0			0			0		0	
14		0			0			0		0	
15		0			0			0		0	
16		0			0			0		0	
17		0			0			0		0	
18		0			0			0		0	
19		0			0			0		0	
20		0			0			0		0	
21		0			0			0		0	
22		0			0			0		0	
23		0			0			0		0	
24		0			0			0		0	
25		0			0			0		0	
26		0			0			0		0	
27		0			0			0		0	
28		0			0			0		0	
29		0			0			0		0	
30		0			0			0		0	
31		0			0			0		0	
	Total Free **Count**: [sum of **9**]= **18)**		0	Total Reduced **Count**: [sum of **12**]= **19)**		0	Total Paid **Count**: [sum of **15**]= **20)**		0	0 0	21) [Sum of Col **16**] **must equal sum of 18+19+20 across**
										initial and date:	
Use Highest Eligibles* from Columns 7,10,13 ->		FE* = **22)**	Claim #1a		RE* = **23)**	Claim #1b		PE* = **24)**	Claim #1c	Total Eligible= **22+23+24= 25)**	Claim # 1d 0

**********For SFA Single POS consolidation ONLY:**********

FE*xDaysxAF=[**22x2x3**]= **26)** 0.00	RE*xDaysxAF=[**23x2x3**]= **27)** 0.00	PE*xDaysxAF=[**24x2x3**]= **28)** 0.00	**Total** =[**26+27+28**]= **29)** 0.00
claim: 18 cannot exceed 26	**claim: 19 cannot exceed 27**	**claim: 20 cannot exceed 28**	**claim: 21 cannot exceed 29**

30) completed by and date

Edit Check Worksheets

Edit Check worksheets are essential for accurate counting and claiming, each district must have a process in which they are recording the number of students eligible by category (free, reduced price, or paid) and record the number the meals actually served each day.

School Food Authorities (SFAs) Edit Check Worksheet

Some districts have electronic counting systems that conduct edit checks, but some districts utilize a paper roster. Districts using the paper roster method must have an edit check process in place in order to accurately count and claim meals and enrolled students. At no time should a district have more meals served for the month then students enrolled for the same month; if this occurs verify the meal counts to ensure that second meals or adults meal were not being claimed for reimbursement.

1. First enter the Name of the School District the Edit Check Worksheet is being completed for. Then:
2. Enter School Name
3. Total Days of Operation for that month
4. Attendance Factor (AF) 94.4 is the National Attendance Factor

   Next circle or place an "X" next to the meal type this worksheet is being completed for (Breakfast or Lunch)
4. Enter the Month the Edit Check Worksheet is being completed
6. Enter the Eligibility
   a. Total Enrolled,
   b. Other (those students visiting or at the site temporarily),
   c. Total (this box will auto populate once a and b have been entered).

Days of the Month (column 6)

Enrollment

Record the highest enrollment by category in columns (7, 10, and 13). Enrollment is the number of students enrolled at the site who are eligible to participate in the National School Lunch Program. This enrollment figure may or may not exclude pre-kindergarten, special education, etc. depending on access and enrollment in your district. Plus any students who transferred in or out during the time of the claim month.

Average Daily Attendance Factor

Attendance factor adjusted eligible is the average daily attendance percentage times the highest number of student's eligible for a specific category (free, reduced, and paid). Attendance Factor (AF) 94.4% is the National Attendance Factor. Columns (8, 11, and 14) reflect each categories eligibility times the attendance factor. (These columns are auto populated), if you have a site with a different attendance factor please contact Child Nutrition to change the attendance factor on your worksheet.

Maximum Number of Meals

Record the number of eligible meals by category in columns (9, 12, and 15), plus any students who are visiting from other schools.

Daily Count Totals

This column auto populates the counts from columns 9, 12, and 15.

Comments

The SFA may add comments on days where the site may have visiting students or other guests that where served a meal.

RCCI Edit Check Worksheet

RCCIs using the paper roster methods will also need to have edit checks in place, similar to school districts, in order to accurately count and claim meals. RCCIs without day students generally have an enrollment of 100 percent free students, therefore the RCCI Edit Check worksheet is slightly different then the worksheet for school districts.

RCCI Edit Check Worksheet (single site/all free) — Name of RCCI: — **Form D-2**

All 100% residential RCCIs use 100%

1) Site: — 2) Month — 3) Attendance Factor (AF) 100

	4) Breakfast			5) Lunch			6) Snack			
Day	a) Free eligible	b) FE x AF	4c) Count	a) Free eligible	b) FE x AF	5c) Count	a) Free eligible	b) FE x AF	6c) Count	Comments
1		0	0		0	0		0	0	
2		0	0		0	0		0	0	
3		0	0		0	0		0	0	
4		0	0		0	0		0	0	
5		0	0		0	0		0	0	
6		0	0		0	0		0	0	
7		0	0		0	0		0	0	
8		0	0		0	0		0	0	
9		0	0		0	0		0	0	
10		0	0		0	0		0	0	
11		0	0		0	0		0	0	
12		0	0		0	0		0	0	
13		0	0		0	0		0	0	
14		0	0		0	0		0	0	
15		0	0		0	0		0	0	
16		0	0		0	0		0	0	
17		0	0		0	0		0	0	
18		0	0		0	0		0	0	
19		0	0		0	0		0	0	
20		0	0		0	0		0	0	
21		0	0		0	0		0	0	
22		0	0		0	0		0	0	
23		0	0		0	0		0	0	
24		0	0		0	0		0	0	
25		0	0		0	0		0	0	
26		0	0		0	0		0	0	
27		0	0		0	0		0	0	
28		0	0		0	0		0	0	
29		0	0		0	0		0	0	
30		0	0		0	0		0	0	
31		0	0		0	0		0	0	
Avg.		4d) sum:	0		5d) sum:	0		6d)sum:	0	Total Monthly Avg. of Meals Served

7) Highest # of free eligible from		0	8)Total days of operation:	0	9) highest FE x days x AF = #7 x #8 x #3=	0	
	Columns 4a, 5a and 6a:	Claim: line 1a		Claim: #6	Claim (10Ad or 10Bd) = total Breakfasts (4d) above	0	cannot exceed #9 (FE x days x AF)
					Claim (7d) = total Lunches claimed (5d) above	0	cannot exceed #9 (FE x days x AF)
					Claim (8Ad)or(8B) = total Snacks claimed (6d) above	0	cannot exceed #9(FE x days x AF)

RCCI Edit Check Worksheets Instructions

First enter the Name of the RCCI the Edit Check Worksheet is being completed for. Then

1. Enter the Site Name
2. Month the Edit Check Worksheet is being completed
3. Attendance Factor (AF) 100% is the RCCI attendance factor (unless the RCCI has day students)

MEAL TYPE

Columns 4, 5, and 6 reflect the meal type for which the edit check worksheet is being completed

DAYS OF THE MONTH (RCCI may claim up to 31 days depending on the month)

ENROLLMENT (Eligible)

Record the highest enrollment by meal type in columns (4a, 5a, and 6a). Enrollment is the number of students enrolled at the site who are eligible to participate in the

National School Lunch Program. Plus any students who transferred in or out during the time of the claim month.

AVERAGE DAILY ATTENDANCE FACTOR

Attendance factor adjusted eligible is the average daily attendance percentage times the highest number of student's eligible. RCCIs attendance factor (AF) is 100% (unless the RCCIs has day students). Columns (4b, 5b, and 6b) reflect each meal types eligibility times the attendance factor. (These columns are auto populated).

MAXIMUM NUMBER OF MEALS

Record the number of eligible meals served by meal type for each day in columns (4c, 5c, and 6c).

COMMENTS

The RCCI may add comments on days where the site may have visiting students or other guests that where served a meal.

AVARAGE COUNT TOTALS

This column auto populates the counts from the sums of (4d, 5d, and 6d).

HIGHEST ELIGIBLE (Box 7)

Records the highest student count eligible from columns (4a, 5a, and 6a). This cell auto populates.

OPERATING DAYS (Box 8)

Records the total number of days meals where served. This cell auto populates.

TOTALS (Box 9)

Records the highest eligible counts by meal type times days of operation, times attendance factor. This cell auto populates.

Verification

Pre-Verification Procedures
Verification Requirements
Steps for Completing Verification
Question and Answers

Pre-Verification Procedures

Use of Direct Certification System

Prior to beginning the verification process, all LEAs are required to have accessed and used the electronic direct certification system available through the state agency's PrimeroEdge database. This must be completed no later than October 1.

On October 1, districts must attempt to directly certify as many students as possible that are currently on applications.

Students that are able to be directly certified will no longer need to have their application included in the October 1 application count. The reduction of total applications will reduce the number of applications that must be verified.

There are eLearning trainings available at: https://education.alaska.gov/ELearning/. The two training modules to provide more information in the area of verification are Eligibility for School Meals, and Verification Edit Check.

Verification Requirements

Verification is the confirmation of eligibility to receive free and reduced-price meals under the National School Lunch and School Breakfast Programs. Verification is only required when eligibility is determined through the use of a paper or electronic household application, not through direct certification or for students determined to be categorically eligible. Verification must include either confirmation of income eligibility or that a member of the household being verified is receiving SNAP, TANF, or other directly verifiable status.

Verification Time Line

- **October 1, Prior to Application Count** Attempt to direct certify students currently receiving benefits based on a household eligibility application.
- **October 1, After use of Electronic Direct Certification System** Count all approved household applications on file, by category, and begin verification process. This includes Income, SNAP/TANF, or Foster Child applications.
- **Last Operating Day of October** Count of **all eligible students** by category (categorically eligible, free based on SNAP/TANF, free based on income, and reduced). All LEAs, including those participating in the Community Eligibility Provision (CEP) or Provision 3 will need to be prepared to provide student counts.
- **November 15** LEAs must have completed verification process.
- **February 1** Submit Verification Collection Summary Report (VCSR) to CNP. All LEAs, including those participating in CEP or Provision 3, must submit a VCSR.

Exceptions from Verification Process

- Districts in which **ALL** sites only participate in the Special Milk Program
- Districts that **do not have any** free or reduced price eligible students

Steps for Completing Verification

Step 1: Select Sample

The sample size is based on the total number of the following approved applications: **Household Size/Income; SNAP/TANF**; or **Foster Child**. LEAs are not required to count applications for students in split-session pre-school or kindergarten programs that are only participating in the Special Milk Program.

Standard Sample Size The lesser of 3 percent **OR** 3,000 of **all** approved household applications on file as of October 1. Applications must be selected from income based **error-prone* applications first**. If there are not enough error-prone applications to comply with the required sample size, LEAs may randomly select additional applications to fulfill the 3 percent **OR** 3,000 application requirement from all remaining approved household applications.

* **Error-prone applications** are those applications with a total household income listed within: $100 per month (or $1,200 per year) above or below the FREE income eligibility limit; OR, below the REDUCED income eligibility limit. Income eligibility guidelines are posted at https://education.alaska.gov/tls/cnp/NSLP.html

EXAMPLE An LEA has 200 approved Household Size/Income, SNAP/TANF, or Foster Child applications on file as of October 1. Six applications will need to be verified (3 percent of 200). These six applications must be selected from income based error-prone applications first. If there are not enough error-prone applications, the remaining applications may be selected randomly from all remaining approved household applications. **When calculating sample size, LEAs must round ALL numbers up to the next whole number.** For example, 1.12 = 2, 7.48 = 8, etc.

LEAs cannot verify more or less than the required sample size. LEAs are not allowed to verify 100% of all approved household applications.

Some LEAs may qualify to use Alternate Sample Sizes, LEAs may contact the State agency to see if this is any option for them. To learn more about these qualifications, Alternate Sample Sizes, eligibility and verification, please see the Eligibility Manual for School Meals at: https://education.alaska.gov/tls/cnp/NSLP.html

Step 2: Conduct Confirmation Review

Once the verification sample has been selected, LEAs must designate a Confirming Official to conduct a confirmation review on each application selected for verification. The confirmation review is done to check the accuracy of the initial determination of benefits on the household application. This step must be done prior to contacting households regarding their selection for verification. The Confirming Official must be someone other than the Determining Official (the official responsible for determining the children's eligibility for benefits).

LEAs may choose to have a confirming official review all household applications, but at a minimum the confirming official must review all applications selected for verification. LEAs that confirm any other amount of applications (every 5th, 10th, 20th) would not be in compliance with USDA requirements.

Template letters can be found on the CNP website at https://education.alaska.gov/tls/cnp/NSLP2.html.

Next Step may vary based on the results of the application determination:

- **Correct—Proceed to Step 3: Complete Verification.**
- **Incorrect—Status should be changed from free to reduced-price.**
  - Do not change benefit level or notify the household until verification is completed.
  - Proceed with Step 3: Complete Verification.
- **Incorrect—Status should be changed from reduced-price to free.**

- Make the increased benefits available immediately.
- Notify the household of the change in benefits. Please use the sample letter "We Have Confirmed Your Application" located under the Household Application for School Meals Template.
- Proceed with Step 3: Complete Verification.

- **Incorrect—Status should be changed from free or reduced-price to paid.**
  - Immediately send the household a notice of adverse action. Please use the sample letter "We Have Confirmed Your Application" l located under the Household Application for School Meals Template.

The Confirming Official must sign on the space provided on the household application or sign a cover letter to attach to the reviewed applications.

Decline to Verify Option

After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications in the selected sample. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request; i.e., family speaks another language, family moves frequently, etc.

Any application removed from the sample under this option must be replaced with another approved application of the same type as the declined application. For example, a declined error-prone income application should be replaced by another error-prone income application. If there are no more error-prone income applications, select one randomly from all remaining approved applications that were on file as of October 1. The newly selected application must then go through a confirmation review.

For LEAs where five percent of the total applications results in less than one application, one application must still be replaced. All results of the five percent calculation are rounded up to the next whole number.

Step 3: Complete Verification by Direct or Standard Verification Procedures

Direct Verification Procedures

Direct verification MUST be the first step to verify all household applications that have been selected for verification.

Any household application selected for verification approved based on income (free or reduced-price), SNAP/TANF, or Foster Child can be attempted to be directly verified by contacting the local public assistance office to confirm eligibility. If any household member (student or not) listed on the household application is verified as receiving SNAP/TANF benefits, then all school-age members of that household who are attending a school participating in the NSLP are then verified to be eligible to receive free meals.

To verify SNAP/TANF application using case ID number: Each LEA contacts their local public assistance office for verification of benefits, or follow the instructions in the Direct Certification section of this manual.

SNAP/TANF Direct Verification Results

When there is a match, any child associated with the number will be eligible for Free meal benefits.

Household application(s) selected for verification that are correctly verified to be eligible for free benefits through direct verification will not require any contact with the household.

Exception: Households originally approved for reduced-price benefits that are verified to be eligible for free benefits through direct verification must be sent a "We Have Verified Your Application" letter, located under the Household Application for School Meals Template should be used to notify the family of the change in benefit level.

Standard Verification Procedures

Household applications selected for verification that cannot be directly verified must be sent a letter informing them of their selection.

The **"We Must Verify Your Application"** letter located under the Household Application for School Meals Template should be used and must include the following information:

- The household was selected for verification;
- The household must list all adult household members. Adult household members are no longer required to provide all or part of their social security number;
- Types of acceptable information needed to complete verification, including pay stubs, social security, support payment decrees, etc;
  - or in place of income information a household may provide proof that a member of the household being verified receives SNAP/TANF benefits. Please see direct verification option.
- Documentation of income or receipt of SNAP/TANF benefits can be provided for any point in time between one month prior to the date of application and the time the household is requested to provide income or SNAP/TANF documentation;
- Information must be provided by a specified date, and that failure to do so will result in termination of benefits;
- LEA contact name and telephone number that households may call for assistance regarding the verification process. The call must be free to all households. LEAs may establish a toll-free number, allow households to reverse phone charges, or provide different telephone numbers for each local calling area within the district;
- The Privacy Act statement.

Income Applications—Acceptable Documentation

Acceptable written evidence for income eligible households must contain the name of the household member, amount of income received, frequency received, and the date the income was received. For example, a pay stub with no dates would be insufficient. Households must submit adequate documentation to allow an accurate determination to be made. If a member of the household is self-employed and submits a tax return from the previous year to document income, net income should be used.

- **SNAP or TANF Applications**—Acceptable Documentation of SNAP or TANF Applications from households includes: A letter on Alaska Department of Health and Social Services (DHSS) letterhead and signed by family caseworker stating the household member(s) SNAP or TANF number; or, a monthly statement from DHSS reflecting the type of benefits received by the household.
- **Required Follow-Up Contact**—If the household does not respond, or responds inadequately, to the first request for verification materials, the LEA must make at least one additional attempt to obtain documentation of eligibility prior to November 15. This second follow-up attempt can be made by mail, telephone, electronic mail, or through personal contact. LEAs must inform households that failure to comply with verification will result in termination of benefits, and document all contacts with the household in the space provided on the application.

When is Verification Complete?

The verification process is considered complete when:

- Household submits all required information to support original household application. Evidence provided verifies current meal benefit level.
- Household indicates, verbally or in writing, that it will not comply with verification request or that they no longer want to receive free or reduced-price meal benefits.
- Household submits all required information based on household application. Evidence provided requires a change, reduction, or termination of benefits.
- Household does not respond or comply within required timeframe. Non-compliance results in a termination of benefits.

Step 4: Notify Household

Once the verification process is completed, all households must be notified of the results. Please use the "**We Have Verified Your Application Letter**" template.

If verification results in:

- No change to the benefit level, notify the household.
- Increased benefits (reduced-price to free), notify the household and change the benefits of all children in the household no later than three operating days from the time of the new determination.
- Decreased or terminated benefits (free to paid, reduced-price to paid, or free to reduced-price), notify the household providing them the required ten-calendar-day written advance notice. The first day of the ten-calendar-day written advance notice is the day the notice is sent. Households that are subject to a decrease or termination of benefits may request a hearing.

If the household requests a hearing during this ten-calendar-day period, the LEA must continue to provide benefits for which the child was originally approved until a hearing is held. The hearing official must be an individual who was not a part of the approval or verification process.

- If the hearing official rules that benefits must be reduced or terminated, the reduction or termination of benefits must take place within ten operating days after the hearing official renders the decision.
- If the hearing official rules that benefits must be increased, the increase in benefits must take place within three operating days after the hearing official's decision.

If the household does not request a hearing during this ten-calendar-day advance notice, the reduction or termination of benefits must take place no later than ten operating days after the ten-calendar-day advance notice.

Households That Reapply

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, if benefits to a household have been terminated as a result of verification and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in SNAP or TANF at the time of reapplication. In this instance, the LEA should verify the eligibility prior to approval of the household application. These are not considered new applications and the guideline of approving based on face value does not apply.

Sample Timeline for Steps 1–4

- **October 1**—Application count completed after direct certification was performed.
- **October 2**—Sample size calculated based on October 1 application count, applications to be verified are pulled and a confirmation review is performed.

- **October 3**—Direct verification is attempted for selected applications. Applications that are unable to be directly verified are sent notification letters of their selection for verification. Households should have at least 10 calendar days to comply with the request.
- **October 20**—Households that did not comply with first request must be sent a second notice. Households should be given at least 3 business days to comply with the second request.
- **October 25**—Households that did not comply with the second request are sent a letter notifying them that their benefits are being terminated. Benefits will be terminated 10 days from the date notification is sent.

  Please note, any household sent a termination of benefits letter has the opportunity to request a hearing. This may delay the actual termination of benefits. If any date(s) set is/are going to fall on a weekend or holiday, the date(s) should be adjusted to the next business day.
- **November 4**—The termination of benefits goes into effect (if applicable), verification is considered complete and results of verification are ready to be compiled for submitting on the required Verification Summary Report.
- **November 15**—All verification processes should be completed. Any changes in benefits should be done by this date unless the household requested a hearing.

For additional information on application approvals or verification you may review the Eligibility Manual for School Meals at: https://education.alaska.gov/tls/cnp/NSLP.html

LEAs are not required to make more than one requests for verification materials after the initial notification. Delaying closure of verification process may put LEAs at risk of not meeting USDA verification requirements and deadlines.

Step 5: Enrollment and Student Counts—Last Operating Day of October

All NSLP sponsors/districts, regardless of Provision, CEP, or RCCI status, must provide enrollment and/or student counts as applicable on the VCSR.

Step 6: Verification for Cause

The required verification sample cannot exceed the percentages defined in "Step 1: Select Sample". However, LEAs have an obligation to verify questionable applications. Income and SNAP/TANF applications may be subject to verification for cause (if HEA is citing a case number rather than directly certified for benefits).

Verifications for cause are not part of the required sample and may be done at any time during the school year. Direct verification can be attempted in all verification for cause situations.

Any applications verified for cause prior to submission of the VCSR, will need to have the results of the verification for cause reported on the VCSR. The VCSR is due to CNP no later than February 1st.

Tracking Confirmation and Verification Efforts

LEAs should use the "Application Data" tab on the VCSR to track verification efforts.

Step 7: Submit Verification Collection Summary Report

Federal regulations require CNP to annually collect a summary of LEA verification efforts. A sample Verification Collection Summary Report (VCSR) is distributed at the start of the school year. Detailed instructions are included in the VCSR. The Verification Summary Report is due to CNP no later than February 1.

Questions and Answers

Q1. Our district always verified 100 percent of the free and reduced-price Household Eligibility Applications. Is this still allowable?

A1. No, USDA no longer allows for verification of ALL applications. Regulations require sponsor to verify no more or no less than three percent of your total approved applications on file as of October 1, XXXX.

Q2. Jones High School has 180 approved applications on file as of October 1, how many must they verify?

A2. Six. They must use the standard sample size—three percent or 3,000 approved applications (whichever is less) selected at random from error-prone applications. Therefore, they must verify six applications (selected first from error-prone, then random). Three percent of 180 = 5.4, always round up.

Q3. Devine School District has the following combination approved for free or reduced-price lunch:

- 16 students based on 3 migrant/homeless/runaway listings
- 116 students based on 84 income-based applications
- 7 students based on 4 TANF/SNAP applications
- 45 students based on 45 TANF/SNAP Direct Certification

A3. Devine School District does not qualify for the alternate sample sizes. How many applications must they verify under the standard sample size?

Three. Keep in mind the verification sample is selected from the number of approved applications, not students, on October 1. These applications do not include Direct Certification and homeless/runaway/migrant listings as they are not subject to verification. Therefore, there are 88 approved applications from which you select 3 percent to fulfill the standard sample size. Eighty-eight applications x .03 = 2.64 = 3, always round up.

Q4. Following the standard sample size guidelines, Devine School District must verify three applications. Of their 88 applications, 2 are error-prone. Is verifying the 2 error-prone applications sufficient?

A4. No. The sample size required them to verify three (3 percent of 88). They must therefore select the third application at random from all approved applications (which may include a SNAP or TANF application).

Q5. You must verify 20 applications and one of the error-prone applications you select is from a household you know has recently moved but has not provided you with an address or phone, which makes contacting them difficult. Must you still verify this application?

A5. You have the option of declining to verify up to five percent of your selected sample. With 20 applications, you can decline to verify one application. If you decline to verify an application, you must randomly select another application (first from error-prone and if not enough error- prone, then select randomly from all approved applications).

Q6. Consolidate School District did not complete and submit the verification collection summary report (VCSR) by February 1. What are the possible issues that could result from failure to complete and submit an accurate VCSR by the deadline?

A3. Any NSLP/SBP sponsor that does not submit the VCSR by the February 1 deadline is subject to withholding of payment of any meal claims filed after February 1 NSLP/SBP sponsors will be able to continue filing claims, but payment of those claims will not be processed and paid until a complete and accurate VCSR is submitted to CNP.

Q7. Grand Island School district has a total of 13 NSLP/SBP sites. Three of those sites are operating CEP, and one site is an RCCI with no day students. How many sites of Grand Island School District will need to complete the verification process?

A7. Nine. CEP sites and RCCIs with no day students are exempted from the verification process, only the 9 sites that actually use and process household eligibility applications will need to complete the actual process of verification. The CEP and RCCI sites only need to provide student counts.

Q8. An application approved on August 28 is selected for verification. To document their income, the household submits payroll stubs from July 31 of that year. Are these payroll stubs acceptable?

A8. Yes. You must accept any documentation dating anytime from one month prior to the date of application, up to the date verification materials are requested (for most, this means July through October.)

Resources for Verification

USDA Eligibility Manual https://education.alaska.gov/TLS/CNP/pdf/EligibilityManualforSchoolMeals.pdf

Verification Edit Check DEED eLearning Module https://education.alaska.gov/eLearning/courses.html

Miscellaneous

Meal Service
Cooperation with Research & Evaluation
Local Wellness Policy
Accommodating Children with Special Dietary Needs
Civil Rights Requirements
Food Safety
Monitoring
Professional Standards

Meal Service

Meal Service Times and Access

Schools participating in the National School Lunch Program must offer lunch between 10:00 am and 2:00 pm, unless exempted in writing by Child Nutrition programs, and breakfast at or close to the beginning of the child's school day. Schools are encouraged to provide sufficient lunch periods that give all students enough time to be served and to eat their lunches; at least ten minutes after receiving breakfast and twenty minutes after receiving lunch. Schools must provide access to meals to all students who are enrolled and present during meal services.

Water During Meal Service

Schools participating in the National School Lunch Program must make potable water available to children at no charge in the place when meals and snacks (if school participates in the Afterschool Snack Program) are served. There are a variety of ways that schools can implement this requirement. For example, schools can offer water pitchers and cups on lunch tables, a water fountain, or a faucet which allows students to fill their own bottles or cups with drinking water. Whatever method is used, the water must be available without restriction in the location where meals are served.

While potable water is required to be made available to students, it is not considered part of the reimbursable meal and students are not required to take the water. Although reimbursement is not available for this requirement, reasonable costs associated with the provision of potable water would be an allowable expense to the non-profit food service account.

Frequently asked questions regarding water during meal service

Question: Potable water is required to be "in the place where meals are served during meal service". Can you provide additional detail on what this means?

Answer: The location of the potable water must be in the foodservice area or immediately adjacent to the meal service area. For example, if a school has a water fountain that is immediately outside the door to the foodservice area (and accessible to all students during the lunch period) this could be considered sufficient. The water fountain must be operational and able to provide potable water to students in a reasonable time during their meal period.

Question: If there is a water fountain in the food service area available to students during the meal period, would this meet the requirement?

Answer: Yes. This meets the requirement, as long as the students have sufficient time to use the water fountain during their meal period. It is important to consider

the amount of time it takes students to obtain water; children should not have to wait in long lines.

Question: We have two water fountains in the courtyard outside the cafeteria. Would this be acceptable?

Answer: Only if the water fountain is adjacent to the foodservice area and children are routinely allowed access to this area during the meal.

Question: What is considered "reasonable costs"? For example, constructing fixed water fountains, major plumbing renovations, purchasing water dispensers, providing bottled water throughout the school, reverse osmosis machines?

Answer: A reasonable cost associated with providing water, in its nature and amount, is a cost that does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. The cost must be the result of sound business practice and competitive prices. The cost must be reasonable, necessary, and allocable to the Federal school meal programs to be an allowable cost. In determining whether a cost is a reasonable and necessary cost associated with providing water, a school food authority (SFA) should ask the following questions:

- Would a prudent person find the cost to be reasonable?
- Is this cost at a fair rate or do alternatives exist that may be more cost effective?
- Is the cost a significant deviation from the established practices of the SFA which may unjustifiably increase costs borne by the nonprofit school food service account?
- Could the SFA defend this purchase to the State Agency (SA)?

For example, the cost of providing pitchers or cups that would be filled with potable water from the faucet or providing them to students to fill with potable water from a faucet is a reasonable cost. Some schools may want to provide water bottles to students or other alternatives; however, the SFA would need to determine whether such an option would meet the requirements for cost allowability (i.e. necessary, reasonable, and allocable) and meet the specific needs of the SFA.

A cost is generally not reasonable if it adds materially to the value of the building and related facilities or appreciably prolongs its intended life, as those types of costs are capital expenditures and should be borne by the school district's general fund. The cost associated with major plumbing would likely add to the permanent value of the school and is typically a cost that should be borne by the school district's general fund, the addition of a water fountain to allow for compliance with the statutory potable water requirement makes the cost acceptable.

Equipment to filter water (e.g., a reverse osmosis filter system) could be reasonable depending on the cost, the need for such equipment, and if the SFA can show:

1. That it has sufficient funds;
2. That the district truly is lacking in capital improvement funding; and
3. That the expenditure is necessary to carry out the mission of the program.

It is difficult to assess reasonableness without knowledge of the specific cost and an understanding of that cost. Many costs have to be analyzed on a case-to case basis in order to determine if the cost is truly reasonable; in such cases, the SFA should consult with its SA for guidance.

Question: Can a SFA charge the student for the cups in order to access water?

Answer: No. Charging students for cups in order to access water would be considered restricting access to water.

Question: What should an SFA do about meals that are served outside of the cafeteria, such as those served in a classroom, in-school suspension etc.?

Answer: Schools must make water available for these students.

Question: Can the water be served at room temperature? Does the water have to be ice water?

Answer: The water does not have to be served chilled; water can be served at room temperature. Children may find water to be more palatable if served chilled.

Question: Must cups be provided and is there a minimum required size for cups (if provided)?

Answer: The SFA must provide cups if providing water in a bulk container (other than a drinking fountain). Cups should be suitable for the age of the child.

Question: Can SFAs require that children bring their own cups, bottles, drinking vessels?

Answer: The SFA must provide cups at no cost to the child. Children cannot be required to bring their own cups for water provided in a bulk container.

Leftover Foods

Schools should plan and prepare meals with the goal of serving one reimbursable lunch, and if applicable one reimbursable breakfast, per child per day. However, with fluctuations in attendance and participation, leftovers are likely. If a school has leftovers on a frequent basis, menu planning and production practices should be adjusted to reduce leftovers. All alternatives permitted by program regulations and State and local health and safety codes should be exhausted before discarding food. Options may include using leftovers in subsequent meal services, offering "sharing tables", or transferring food to other sites.

Where it is not feasible to reuse leftovers, excess food may be donated to a nonprofit organization, such as a community food bank or homeless shelter which is exempt from tax under section 501(c)(3) of the Internal Revenue Code of 1986 (26 U.S.C. 501 (c)(3), e.g. soup kitchens or homeless shelters. The cost of such donated food is an allowable operating cost of the school food service account. If schools choose to donate leftovers, documentation of the quantity and costs of the foods that were donated, as well as the name(s) of the receiving organization(s) must be kept, and ensure local health department rules and regulations are followed.

Cooperation with Research & Evaluation

Institutions participating in Child Nutrition Programs are required to cooperate with the United States Department of Agriculture officials and contractors conducting evaluation and research.

Local Wellness Policy

Any school or Residential Child Care Institution that participates in a program authorized under the National School Lunch Act or the Child Nutrition Act must establish a Local Wellness Policy with the objectives of:

- Setting goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness
- Setting nutrition guidelines for all foods available on school campus during the school day
- Assuring nutrition guidelines for school meals will not be less restrictive than federal policy

- Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and review and update of the local wellness policy
- Inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policy
- Be measured periodically on the extent to which schools are in compliance with the local wellness policy and the progress made in attaining the goals of the wellness policy, and make this assessment available to the public
- Policies for food and beverage marketing that allow advertising for those products that meet the Smart Snacks standards

Acceptable methods for informing and updating the public may include dissemination of printed or electronic materials to families of school children and other members of the community at the beginning of the school year and/or posting on the district or school website. Whatever method is chosen, the information must be made available to the public by SFAs in an accessible, easily understood manner.

Districts must conduct an assessment of the wellness policy every three years, at a minimum. This assessment will determine:

- Compliance with the wellness policy,
- How the wellness policy compares to model wellness policies, and
- Progress made in attaining the goals of the wellness policy

Districts must permit participation in the development, updates, and assessment of the wellness policy by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators).

Resources:

- *CNP Wellness Webpage* https://education.alaska.gov/TLS/CNP/wellness.html
- *Wellness Policy Tool, Action for Healthy Kids* http://www.actionforhealthykids.org/tools-for-schools
- *Alliance for a Healthier Generation* https://www.healthiergeneration.org/take_action/schools/
- *Team Nutrition* http://www.fns.usda.gov/tn/local-school-wellness-policy

Accommodating Children with Disabilities and/or Special Dietary Needs

USDA regulations require SFAs to ensure that breakfast, lunch, snack, or milk (meals) offered through the School Meal Programs meet the respective meal pattern requirements. Federal law and USDA regulations further require SFAs to make reasonable modifications to accommodate children with disabilities. This includes providing special meals, at no extra charge, to children with a disability when the disability restricts the child's diet. SFAs are required to make substitutions to meals for children with a disability that restricts the child's diet on a case-by-case basis and only when supported by a written statement from a licensed healthcare professional authorized to write medical prescriptions under State law, such as a physician, physician's assistant, and nurse practitioner.

SFAs should also be aware that the Individuals with Disabilities Education Act of 1990, as amended (IDEA) imposes requirements on States which may affect them, including the service of meals, even when such service is not required by the School Meal Programs. For example, the individualized education program (IEP) developed for a child under the IDEA may require a breakfast to be served in a school that does not participate in the School Breakfast Program. While these meals may not be claimed for Federal reimbursement because the school does not participate in the

program, funds from the non-profit school food service account may be used to cover the cost associated with providing a meal required by the IDEA.

Medical Statement for Meal Accommodations:

1. **For a student with a disability or physical or mental impairment that substantially limits one or more major life activities**

   Substitutions must be made to the regular meal, including milk for any child with disabilities when a signed statement from a medical authority is received. The statement must include sufficient information about the impairment, how it restricts the diet, and how to accommodate the condition. The medical statement should also include the food(s) and/or beverage(s) to be omitted and foods/beverages to be substituted.

   SFAs should seek clarification with the family if the medical statement accommodations are inadequate or unclear, however clarification should not unnecessarily delay accommodations as that would be perceived as denial. SFAs may not request medical records or charts to support the medical statement.

2. **For a student without a disability or physical or mental impairment that substantially limits one or more major life activities requesting fluid milk substitution**

   Any fluid milk substitution that meets these requirements may be made by the SFA for non- disabled students when the following requirements are met:

   - A signed statement from a medical authority, parent or guardian which includes the medical or other special dietary reason for the need for substitution. Any reasonable request could be accepted (e.g. milk allergy, vegan diet, and religious, cultural or ethical reasons). If the request only states that a child does not like milk, the student can be offered flavored milk instead of a milk substitute.
   - The SFA may choose the nondairy beverage to be provided, as long as the substituted beverage includes the following nutrients:

NUTRIENT	PER CUP
Calcium	276 mg
Protein	8 g
Vitamin A	500 IU
Vitamin D	100 IU
Magnesium	24 mg
Phosphorus	222 mg
Potassium	349 mg
Riboflavin	0.44 mg
Vitamin B-12	1.1 mcg

   Because the Nutrition Facts Label on food products does not list all the required nutrients listed above, the food service operation must request documentation from the product manufacturer to confirm the presence of all required nutrients at the proper level. NOTE: Lactose-free milk provides the same nutrients found in regular cow's milk; therefore, it can be served as part of the reimbursable meal without documentation/written statement.

   - Expenses that exceed program reimbursements must be paid by the SFA for fluid milk substitutions.
   - The SFA must inform the State agency of schools that choose to offer fluid milk substitutes for non-disabled students.
   - The substitution request must remain in effect until the request is revoked or the school changes its fluid milk substitution policy for non-disabled students.

- Child Nutrition Programs maintains a list of milk substitution products found in Alaska that meet the nutritional requirements. Please contact our office as needed.

Schools can receive reimbursement for meals without milk if they operate Offer versus Serve (OVS), under which milk or other meal component(s) could be declined by a student. If a school does not participate in OVS, a non-disabled child with a medical or special dietary need must take the regular fluid milk or an acceptable milk substitute provided by the school in order for school to claim meal for reimbursement.

Resources:

- *Medical Statement for children with disabilities or special needs:* https://education.alaska.gov/TLS/CNP/specneeds.html

Accommodation Guidance

- *Accommodating Children With Special Dietary Needs in the School Nutrition Programs* (USDA guidance) https://education.alaska.gov/TLS/CNP/pdf/USDA-AccomodatingChildrenSpecialDietaryNeeds.pdf
- Policy memorandum on Modifications to Accommodate Disabilities in the School Meal Programs https://fns-prod.azureedge.net/sites/default/files/cn/SP59-2016os.pdf
- Handbook for Children with Special Food and Nutrition Needs (National Food Service Management Institute/Institute of Child Nutrition) https://education.alaska.gov/TLS/CNP/pdf/NFSMI-HandbookChildrenSpecialFoodNutritionNeeds.pdf

Civil Rights Requirements

This information outlines specific responsibilities, requirements, and procedures for federally-assisted programs to ensure federal, state, and local compliance with the provision of Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973.

After each specific responsibility/requirement is identified, suggested ways to meet the responsibility/requirement are listed.

Program Operations

- Denied free and reduced-price applicants should not be disproportionately composed of minority groups.
- Admission procedures should not restrict enrollment of minority persons.
- Program operations should not discriminate against participants based on race, color, national origin, sex, age, or disability. Examples include seating arrangements, serving lines, assignment of eating period, and selection of applications for verification.

Public Notification

- Display in a prominent place the USDA "and Justice for All" poster containing the nondiscrimination statement and the federal procedure for filing a complaint. Posters may be obtained by contacting CNP.

All printed school nutrition program informational materials, such as free and reduced-price meal notification letters, web sites, and public releases, must include the following nondiscrimination statement and complaint procedures:

> In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at:

http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

(1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;

(2) fax: (202) 690-7442; or

(3) email: program.intake@usda.gov

This institution is an equal opportunity provider

If the material is too small to permit the full statement above, such as on a menu, the material, at a minimum, must include the following statement in font size no smaller than the text of the material: **This institution is an equal opportunity provider**.

- Provide information in the appropriate translation concerning the availability and nutritional benefits of the school nutrition program, as needed. This requirement can be met through the use of bilingual staff members, volunteers, and/or informational materials in appropriate languages.
- Develop and implement a procedure to process civil rights complaints. A civil rights complaint procedure may be developed by the SFA.

Training

- Must provide civil rights training to their sub recipients, including front-line staff, on an annual basis. To assist in training a Civil Rights PowerPoint presentation is available at https://education.alaska.gov/TLS/CNP/CRR.html.
- Frontline staff is defined as those who interact with program applicants or participants, and those persons who supervise frontline staff.
- Specific subject matter for training must include: collection and use of data, effective public notification systems, complaint procedures, compliance review techniques, resolution of noncompliance, requirements for reasonable accommodation of persons with disabilities, requirements for language assistance, conflict resolution, and customer service.

Resources:

CNP webpage https://education.alaska.gov/TLS/CNP/CRR.html

Food Safety Requirements

Food Safety Plans

SFAs are responsible for developing a comprehensive food safety plan for food preparation and service site(s) that is based on Hazard Analysis and Critical Control Point (HACCP) principles or Active Managerial Control, and must conform to guidance issued by the USDA. Standard operating procedures for safe food handling must include any facility or part of a facility where food is stored, prepared, or served, such as on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria for SBP, NSLP, SMP, FFVP, and afterschool snack programs.

A school food safety program must include the following elements:

- **A Written Food Safety Plan**—A food safety plan must be developed for each food preparation and service site. The food safety plan must include how to apply HACCP principles by doing the following:
  - Documenting recipe/menu items in the appropriate HACCP process category
  - Documenting Critical Control Points of food production
  - Monitoring
  - Establishing and documenting corrective actions
  - Recordkeeping
  - Reviewing and revising the overall food safety plan periodically
- **Documented Standard Operating Procedures** (SOPs)—SOPs are a very important factor in developing an effective food safety plan. SOPs serve as a specific food safety process and is designed to control hazards not outlined specifically in the general HACCP plan. For example, soiled and un-sanitized surfaces of equipment and utensils should not come into contact with raw or cooked (ready-to-eat) food. Proper procedures to prevent this should be covered by an SOP.

Resources:

Training materials, including food safety templates, USDA guidance documents, and sample SOPs are available at https://education.alaska.gov/TLS/CNP/foodsafety.html.

Resources for Food Safety

Food Safety Plans DEED eLearning Module https://education.alaska.gov/eLearning/courses.html

Sample Food Safety Plan template https://education.alaska.gov/TLS/CNP/docs/food_safety_plan_template2.doc

Food Establishment Inspections

USDA requires that each SFA obtain two food inspections per site where food is prepared or served. For most communities in Alaska these are conducted by Department of Environmental Conservation, Division of Environmental Health, Food Safety and Sanitation Program. SFAs in the Anchorage area will receive inspection by the Municipality of Anchorage. Copies of these inspections must be maintained at the SFA or at the site. The most recent food sanitation report must be posted in a predominant location that is viewable by the general public; i.e., eating area or near the school office.

SFAs that have not received two food sanitation inspections for the school year must write a letter to the applicable inspection office requesting the required two food inspections for each site where food is prepared or served. A copy of this letter must be submitted to CNP annually as documentation of the attempt to comply with two food inspections as required by USDA regulations.

Monitoring Requirements

On-Site Review Requirements

National School Lunch Program (NSLP) regulations require each school food authority (SFA) with more than one site where reimbursable meals are served to annually conduct their own review of each site's meal count and claiming procedures. CNP

recommends even districts with one site perform an annual on-site review of meal counting and claiming procedures.

Although required for NSLP, we recommend you review both NSLP and SBP, especially if meal service times have different staff performing the meal counting function.

This review must be completed by February 1 of each school year for each site. The individual should be familiar with program rules and should be outside the daily operations to provide an objective look at the operations. The review must be conducted by SFA personnel and may not be conducted by contracted parties who are providing the meal service. A sample copy of the On-Site Review Form is available on our website.

A copy of the on-site review must be maintained on file at the site or SFA office for three years plus the current year or in the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed.

If the review disclosed problems, the SFA must correct problems immediately and conduct a follow-up review within 45 calendar days of the initial review. A follow-up review must be conducted to determine if the corrective action resolved the problem. Written documentation is required to be maintained at the SFA or at the site.

On-site reviews are conducted to ensure at each meal service claimed, the following internal controls are operating correctly:

- Daily meal counts by category are taken at the point of service
- All meals claimed meet meal pattern requirements
- Overt identification is prevented
- Sanitation procedures are followed

Professional Standards

Professional standards apply to all school nutrition employees, whether the SFA operates the school nutrition program or contracts with a food service management company. All SFAs must meet the professional standard requirements and designate at least one staff member as "director" to meet the minimum requirements for that position; what the LEA calls the position is not relevant but the person overseeing the nutrition program must meet these criteria

Annual Training Requirements

Training requirements vary by job position. For the purposes of professional standards requirements, all SFAs must identify a "director' who has oversight of the nutrition program regardless of what that position is called.

Job Categories

Professional standards vary by three job categories: directors, managers, and staff. At the local level, there are many different job titles of individuals who perform similar duties. The definitions below are general enough to cover most local school nutrition program employees and can be used to determine their job category:

- Directors plan, administer, implement, monitor, and evaluate all district-wide aspects of school nutrition programs. Regardless of its size, an SFA typically only has one director.
- Managers have direct responsibility for the day-to-day operations at one or more schools.
- Staff prepare and serve meals, process transactions at point of service, and review the free/reduced price applications, along with other routine work. Typically, staff do not have management responsibilities.

Training Requirements

JOB CATEGORY	ANNUAL REQUIREMENT
Directors	12 hours
Managers	10 hours
Staff	6 hours
Part-Time Staff (working less than 20 hours per week)	4 hours
Mid-year hires in all categories (January 1, or later)	One-half of training requirement for each job category

This training must be attended annually between July 1 and June 30 of each year. Training records must be maintained centrally for all staff for the current year plus three years. Positions that involve two or more responsibilities above, must meet the higher training requirements.

The training must be applicable by topic areas.

Nutrition–1000	Menu Planning (1100) Nutrition Education (1200) General Nutrition (1300)
Operations–2000	Food Production (2100) Serving Food (2200) Cashier and Point of Service (2300) Purchasing/Procurement (2400) Receiving and Storage (2500) Food Safety and Hazard Analysis and Critical Control Point (HACCP) (2600)
Administration–3000	Free and Reduced-Price Meal Benefits (3100) Program Management (3200) Financial Management (3300) Human Resources and Staff Training (3400) Facilities and Equipment Planning (3500)
Communications and Marketing–4000	Communications and Marketing (4100)

Hiring Standards for School Nutrition Directors

Hiring standards vary by district size (excluding homeschool/distance programs administered by the district).

	CATEGORY 1	CATEGORY 2	CATEGORY 3
Local Educational Agency (LEA) Student Enrollment Categories	**Districts with enrollment of 2,499 students or less**	**Districts with enrollment between 2,500-9,999**	**Districts with enrollment of 10,000 or more**
Minimum Education Standards	Bachelor's Degree* in specific/related major** (experience preferred, not required) **OR**	Bachelor's Degree* in specific/related major** (experience preferred, not required) **OR**	Bachelor's Degree* in specific/related major** (experience preferred, not required) **OR**
	Bachelor's Degree* in any major AND State-recognized certificate for school nutrition program directors **OR**	Bachelor's Degree* in any major AND State-recognized certificate for school nutrition program directors **OR**	Bachelor's Degree* in any major AND State-recognized certificate for school nutrition program directors **OR**
	Bachelor's Degree* in any major AND 1 year of relevant school nutrition experience **OR**	Bachelor's Degree* in any major AND 2 years of relevant school nutrition experience **OR**	Bachelor's Degree* in any major AND 5 years of school nutrition program management
	Associate's Degree* in specific/related major** AND 1 year of relevant school nutrition experience **OR**	Associate's Degree* in specific/related major** AND 2 years of relevant school nutrition experience	
	High School Diploma (or GED) AND 3 years*** of relevant school nutrition experience		
Food Safety Training	At least 8 hours within 5 years prior to or within 30 days of start date		

* Or equivalent educational experience

** Specific/related major. Academic major or concentration in food and nutrition, foodservice management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.

*** For LEA enrollments less than 500, the state agency may approve the hire of a candidate with a high school diploma (or GED) and less than the required years of experience.

Resources:

- For more information on USDA Professional Standards please see:
  - USDA Professional Standards website http://www.fns.usda.gov/school-meals/professional-standards
  - *Guide to Professional Standards for School Nutrition Programs* http://www.fns.usda.gov/guide-professional-standards-school-nutrition-programs
  - *School Nutrition Association Professional Standards Hub* http://schoolnutrition.org/Cert/USDAProfessionalStandards/
- Online resources to meet the training requirements see:
  - Alaska Child Nutrition Programs eLearning directory https://education.alaska.gov/eLearning/

- Institute of Child Nutrition http://www.nfsmi.org
- School Nutrition Association webinar Wednesdays http://schoolnutrition.org/Webinars/
- USDA Directory of training *Professional Standards for School Nutrition Professionals* http://professionalstandards.nal.usda.gov/

- Tracking Tools for training requirements
  - USDA Tracking Tool http://www.fns.usda.gov/school-meals/professional-standards
  - PrimeroEdge *Team Work* https://education.alaska.gov/TLS/CNP/primero.html

Denying Meals or Milk as Discipline

The USDA regulations set rules on the denial of meals and milk as a form of discipline. The denial of meals and milk as a disciplinary action against any child enrolled in a school participating in a federal Child Nutrition Program is prohibited. If the disciplinary action indirectly results in the loss of meals or milk, it is allowable (e.g., a student is suspended from school).

Administrative Reviews

Pre-Review
On-Site Review
Resource Management Review
Procurement Review
Follow-Up
Close-Out and Reporting

All LEAs participating in the National School Lunch Program, School Breakfast Program, and/or the Special Milk Program are subject to a full Administrative Review (AR) to be conducted on a three year cycle. The Administrative Review is an assessment of the LEAs administration of the NSLP, SBP, and other school nutrition programs. The objectives of the Administrative Review are to:

- Determine whether the LEA meets program requirements
- Provide technical assistance
- Secure any needed corrective action
- Assess fiscal action and, when applicable, recover improperly paid funds

The scope of the Administrative Review focuses on two primary review components: Critical Areas of Review and General Areas of Review.

- **Critical Areas of Review**
  - **Performance Standard 1** focuses on the certification and benefit issuance process and the accuracy of meal counting and claiming.
  - **Performance Standard 2** focuses on whether meals claimed for reimbursement meet meal pattern and nutritional quality requirements.
- **The General Areas of Review**
  - **Resource Management** addresses the maintenance of the nonprofit school food service account, paid lunch equity, revenue from non-program foods, and indirect costs.
  - **General program compliance** includes Civil Rights, LEA On-site Monitoring, Local School Wellness Policy, Smart Snacks in School, Professional Standards, Water, Food Safety, Reporting and Recordkeeping, and SBP and SFSP Outreach.

The Administrative Review is a three-step process that includes: Pre-review documentation, the on-site review, and follow-up to include (possible) corrective action, fiscal action, and close-out.

Pre-Review

By October 15 of a review year, LEAs must send to CNP the following:

a. * Off-site Assessment form
b. Documentation of the LEAs edit check process
c. Data used in consolidating the claim for reimbursement
d. * School Meals Administrative Fiscal Review Worksheet
e. A copy of the LEA's Procurement Plan or Procedure
f. Copy of the most recent assessment on the implementation of the Local Wellness Policy
g. A consolidated list of all vendors paid out of the non-profit food service account, separated by procurement type with general ledger transaction detail and summary reports.
h. Current menus with accompanying documentation for meal service for 1-week with the following back-up documentation:

i. Production records
ii. Recipes
iii. Copies of CN labels & Nutrition Fact labels
iv. Nutrient Analysis (if available) for the site(s) selected by the State Agency for the week of review

i. Food Safety Plan
j. Professional Standard training records for all food service staff

* items denoted with an asterisk will be provided by CNP for the LEA to complete

On-Site Review

On-Site Assessement

To fully evaluate the LEA's compliance with all program requirements, CNP will complete an On-site Assessment which examines the critical and general areas of review including:

- The LEAs free and reduced-price certification to ensure the LEAs process complies with program requirements (RCCIs without day students will not have this portion of the review). This process includes applications, provision documentation, benefit issuance documents, and verification.
- The meal service—to ensure the site(s) and LEA procedures yield accurate meal counts and claims for reimbursement, and to ensure the LEA's meal service complies with requirements. Meal service site visits will be conducted at approximately 10 percent of LEA sites for lunch and approximately 5% of LEA sites for breakfast.
- The General Areas—to ensure all other program areas comply with program requirements including:
  - Afterschool Snack
  - Seamless Summer Option
  - Fresh Fruit and Vegetable Program
  - Food Safety
  - SBP and SFSP outreach
  - Potable Water
  - On-site monitoring
  - Smart Snack

Records

Records to be reviewed during the on-site monitoring may include (as applicable):

- Household Eligibility Applications (HEA)
- Benefit Issuance Document
- Verification paperwork
- Provision III or Community Eligibility Provision rosters and approval
- Procurement records
- Training records
- Health Inspection records
- Current menu
- Production records
- Recipes
- Food Inventory and CN labels
- Meal count documentation
- Civil rights complaint procedure

Before the on-site portion of the Administrative Review is completed, an exit conference is conducted to establish an agreed-upon Corrective Action Plan that

identifies the needed corrective action and the timeframes for those actions. The Corrective Action Plan will identify:

- Administrative Review finding(s)
- The corrective action(s) required
- The timeframe(s) by which the corrective action(s) must be completed
- Any documentation the SA expects the LEA to provide to demonstrate corrective action was completed
- Any fiscal action as a result of review findings

Resource Management Review

LEAs who are deemed high risk or do not complete and submit the Offsite Assessment form prior to the Administrative Review will be subject to a Comprehensive Resource Management Review. LEAs with any risk indicator will be subject to a Resource Management Review for that area of resources. This is an intensive review process that reviews the overall financial health of a LEA's nonprofit food service program.

During the Comprehensive Resource Management Review, state agency staff monitors the following areas:

- Nonprofit school food service account
  - Expenses must be allowable
  - Net cash resources not to exceed three months' average operating expenses
  - To verify the nonprofit school food service account, LEAs will need to provide copies of source documents for 10 percent of all expenses for the year prior.
  - SFAs who transfer general funds into the nonprofit school food service account to help in covering expenses in excess of revenues will be trigger a resource review in this area.
  - A resource review of the nonprofit school food service account includes a review of the Statement of Revenue and Expenses and supporting documentation of revenue and expenses to determine compliance with USDA requirements.
- Paid Lunch Equity
  - Ensure that LEAs comply with the requirements for pricing paid lunches
- Revenue from Nonprogram Foods
  - Verify that LEAs comply with USDA requirements to ensure that nonprogram foods sales generate revenue that meets or exceeds the cost to the school food service account.
  - Price adult meals to ensure that adult payments are sufficient to cover the overall cost of meals, including the value of any USDA Foods used in the production of adult meals.
- Indirect Costs
  - Ensure that LEAs follow fair and consistent methodologies to identify and allocate allowable indirect costs to school food service accounts.

Procurement Review

To verify proper procurement procedures have been implemented, a review of SFA procurement is conducted during the administrative review.

All SFAs must have a procurement plan provides documentation to ensure free and open competition in purchasing, transparency in transactions, comparability, and documentation of all procurement activities. The procurement plan can outline all processes to ensure that procurement is held to high standards. SFAs may develop their own procurement plan or they may see our website at https://education.alaska.gov/TLS/CNP/procurement.html for a template. The procurement plan must include a policy to determine the allowability of costs to ensure that they are necessary and reasonable for proper and efficient administration of the program(s), allocable to federal awards applicable to the administration of the programs(s), and authorized

and not prohibited under state and local laws. This will be reviewed as a part of the administrative review.

The SFA will also complete a procurement workbook based on prior year data which will list all purchases for the year prior (consolidated by vendor), separated by procurement method. The procurement methods and data required are as follows:

Micro-Purchasing (under $3,500)
- Each Vendor
- How many total purchases
- Total cost of purchases
- Product types purchased (dry foods, paper products, etc.)

Small Purchasing (under $150,000)
- By Vendor
- Purchase contract amount
- One-time purchase or multiple
- Number of responses to solicitation
- Product types purchased (dry foods, paper products, etc.)
- Group purchasing

Formal Procurement (greater than $150,000, or less per SFA requirements)
- Each Vendor
- Contract value
- IFB or RFP
- Fixed price or cost reimbursable
- One-time purchase or multiple
- Number of responses to solicitation
- Product types purchased (dry foods, paper products, etc.)
- Group purchasing

Food Service Management Companies
- By vendor
- Product types purchased
- Contract Value
- IFB or RFP
- Fixed price or cost reimbursable
- Number of responses to solicitation
- Group purchasing
- Amendments to contract

Source documents will need to be provided for each procurement type for the state agency to determine if procurement was completed appropriately.

Follow-Up

The LEA must provide documentation of corrective action for any Administrative Review finding(s) identified by the SA in the Corrective Action Plan. Documented corrective action can be provided at the time of the Administrative Review or may be sent in to the state agency at a later date not to exceed the deadline established in the corrective action plan.

Upon receipt of the LEA's documented corrective action, CNP will review the documentation to determine if the corrective action is complete and resolves the finding(s) identified. Once approved, CNP will send a closure letter to the LEA closing the review within 30 calendar days of receipt of the documented corrective action.

Close-Out and Reporting

As of school year 2016–2017, all Administrative Review reports are required to be published and available to the public. These reviews will be available on the state agency website.

USDA Foods

Overview
Procedures
Use of USDA Foods
Disaster Feeding

Overview

The Department of Education & Early Development, Child Nutrition Programs administers the USDA Foods Program (formerly Food Distribution Program). Through this program, surplus food provided by the United States Department of Agriculture (USDA) is distributed to eligible recipient agencies. These donated foods help meet the nutritional needs of children in schools and summer programs.

All schools and Residential Child Care Institutions (RCCIs) which provide a lunch under the National School Lunch Program (NSLP) are eligible to participate in the USDA Foods Program. Child and Adult Care Food Program (CACFP) sponsors which provide a lunch and/or supper under CACFP may also select to participate in the USDA Foods Program or receive cash-in-lieu of USDA Foods; this includes schools participating in CACFP At-Risk Meals excluding snacks.

Eligible Recipient Agencies (RAs)

USDA Foods (government donated commodities) are available to recipient agencies in conjunction with participation in one of the following programs:

National School Lunch Program (NSLP)

Through this program schools and residential child care institutions must provide meals that meet federal guidelines designed to provide one-third of the child's Recommended Dietary Allowances. Recipient agencies receive USDA Foods and cash reimbursement for meals served to children.

Summer Food Service Program (SFSP)

Through this program, schools, units of state and local government, nonprofit private organizations, and residential summer camps provide meals to children during the summer months when school is not in session. Recipient agencies receive federal reimbursement for meals served to children. USDA Foods are available to those agencies that either prepare their own meals or receive their meals from a school food authority (SFA).

Child and Adult Care Food Program (CACFP)

USDA Foods assistance for nonprofit or for-profit agencies providing lunch and/or supper to children or adults in non-residential care, or for lunches and/or suppers for children in residential care in emergency shelters. CACFP sponsors may select cash-in-lieu of USDA Foods based on a rate determined by USDA annually.

USDA Foods Availability

USDA purchases and makes available to states a variety of foods. The selection of foods can change annually due to availability, cost of acquisition, and preferences of recipient agencies. USDA seeks to obtain the largest quantity available at the lowest cost. The USDA advises each state of the types and quantities of foods that might be available. Each state evaluates its needs and reports them to USDA.

The USDA has successfully expanded the variety and forms of USDA Foods available. Today, more than 140 products are available for distribution. USDA Foods provide approximately 15—20 percent of the food offered in each school lunch. In addition, the USDA has revised specifications to reduce fat, sugar, and salt content in recognition of the Dietary Guidelines for Americans published jointly by the United States Department of Health and Human Services and USDA.

Purchases of bonus USDA Foods supplement the basic plan. Bonus foods are in extreme surplus that the USDA wants to remove from the market in an orderly manner. Recipient agencies may order all they can use without waste.

USDA Foods Allocation

Each state receives USDA Foods based on the total number of eligible meals claimed in the NSLP in the state, multiplied by the federal assistance rate, which is determined by the USDA. In turn, each SFA receives a fair share of the state dollars based on the NSLP lunches claimed for reimbursement. This will establish an "entitlement" amount for each SFA, this amount can be located in the CNP Web under the Food Distribution Program section.

The entitlement dollar amount indicates the total value of USDA Foods a sponsor will be able to "purchase" for the program year. When a product is indicated as "bonus" on the product survey, it is not deducted from entitlement. The per-case value of each product is identified on each survey as USDA Value.

USDA sets an annual value of donated foods based on meals served; however the exact amount Recipient Agencies receive may be higher, depending on total number of RAs participating in the program and the rollover balance of State entitlement from the previous year.

The state orders food from USDA based on the quantities requested by the SFAs. The USDA purchases and ships the food to the state within the specified delivery periods.

Annual Ordering Process

Alaska Child Nutrition Programs has developed a web program allowing all schools to view their USDA Foods allocations, place all USDA Foods orders, acknowledge receipt of USDA Foods, and view invoicing for USDA Foods on the Internet through the Child Nutrition Program Web (CNP Web).

SFAs have three options available when placing the annual order. You can use any combination of the following:

USDA Direct (Brown Box)

USDA Direct (or brown box) foods are items that are purchased directly by USDA. These products run a full spectrum of food types. There is a charge against the Entitlement to "purchase" them. CNP bills the Recipient Agencies an administrative fee (per case) to offset administrative cost of the Food Distribution Program. Fact Sheets are available on the CNP website for each USDA Foods item so that a Recipient Agency may determine exactly what is being offered.

Processed (Indirect)

Processed end products are foods items that are processed by vendors (such as Schwan's) using bulk USDA foods in the preparation of the end products. This offsets the cost of the processed end products available to recipient agencies.

The state agency has agreements with several processors to provide specific products selected by the Advisory Council (members are from various school districts throughout Alaska). There are two value pass through methods that can be used:

- **Fee for Service**: Processed commodities (Fee for Service) are ordered by the survey process in the same manner as USDA Foods Direct (Brown Box); however, the survey will also reflect a processing charge, or Fee for Service. This is the amount, per case, due to the processor for that USDA Foods item. The processor will invoice the Recipient Agency directly.
- **Net Off Invoice**: (NOI) is a method of ordering processed USDA Foods through a distributor (such as Food Service of America, Sysco). The RA is billed the commercial price minus the USDA value of the diverted USDA Foods used in the end product (such as chicken in a nugget or cheese in a pizza). The distributor adds shipping and handling charges to the final price. RAs must complete a training session with CNP to be eligible to order through NOI.

As with Brown Box items, CNP will bill its normal per-case administrative fee for processed items, for both Fee-for-Service and Net Off Invoice.

USDA Foods Delivery/Transportation

The State Agency contracts for transportation competitively. The transportation companies may vary year to year and may vary between the two distinct food types: USDA Direct ("brown box") foods, and processed end products due to the differences in the USDA requirements for each.

USDA Direct (Brown Box)

Since the State of Alaska does not maintain a warehouse to store USDA Foods, USDA provides payment of transportation for USDA direct foods to 13 pre-designated destinations in Alaska.

Those locations are:

Anchorage	Bethel
Dillingham	Fairbanks
Juneau	Ketchikan
Kodiak	Kotzebue
Mountain Village	Sitka
Soldotna	Unalakleet
Wasilla	

All RA delivery locations outside of these pre-paid destinations must assume costs to their shipment destination. RAs must contact the contracted transportation carrier if they have specific delivery requests (such as holding deliveries, distribution to all of their sites, use of a specific sub-carrier).

Transportation for USDA Direct/Brown Box is made to the freight dock, station, or hub in the community. Delivery to sponsor locations by the transportation company is not required. By contract, transportation carriers are required to notify RAs of the shipment no less than 48 hours prior to arrival.

Processed End Products

The State pays transportation costs of processed USDA Foods to one receiving location per Recipient Agency. By contract, RAs should be notified of the shipment no less than 48 hours prior to arrival.

Condition of Received Products:

Frozen foods must be maintained at 0°F or below, refrigerated food at 36–40°F, and dry foods at 50–70°F. Bulkheads must be used to split the frozen/refrigerated and dry items when donated USDA Foods are expected to remain on the truck/trailer for 24 hours or more.

Upon delivery, the recipient should check the shipment as follows:

- Count the items received
- Check all items for damage
- Check temperatures
- Compare the delivery form to what was actually received
- Reject damaged items
- Note discrepancies on the delivery form in the Amount Received column (Identify the quantity and whether the items were missing or returned due to damage)
- Sign the delivery form

  NOTE: Once the delivery receipt is signed at the delivery site, the order as signed becomes the responsibility of the SFA.
- Sign the custom delivery (if applicable)
- Mark yes or no regarding delivery satisfaction
- Record receiving date on each case/bag (If not stored in a case/bag, record receiving date, pack date, and contract number on each unit.)

You must contact the State Agency immediately if the delivery was incomplete, damaged, or otherwise unacceptable. If a delivery is more than a month late, you should contact the state agency to determine if there was a transportation issue.

Schools that operate their own food service are not required to maintain a separate inventory for USDA Foods; however, perpetual inventories must be kept at every location where USDA Foods are received and stored. USDA Foods should be stored so foods with the oldest pack dates are used first. There are many ways of ensuring first in, first out (FIFO) is taking place; e.g., computerized locator systems, color-coded locator systems, or marking the containers with pack date. Federal policy does require that the date of receipt be marked on each case.

Receiving Responsibility

1. Check the delivery and have the driver indicate on the bill of lading if there are shortages and/or damages. Refuse all cases that are damaged. Contact the State to report shortages or damaged USDA Foods. The transportation company is not responsible for shortages and/or damages after the delivery has been received by the Recipient Agency.
2. Recipient Agencies must acknowledge receipt of USDA Foods on CNP Web. If a partial shipment is received, it may be entered and if the remainder is received, a second receiving process may occur.
3. Check the Allocated Orders in CNP Web on a monthly basis. If you did not receive an allocated order please contact the State so we can begin to investigate and possibly submit a loss claim.

Procedures

Ordering Procedures

Surveys for ordering USDA Foods are posted on CNP Web under the Surveys Tab. Most ordering of USDA Foods occur during January/February for the upcoming school year. A variety of surveys may be opened during the year. The three most common surveys are:

- USDA direct foods (brown box)
- Processed end products
- Bonus foods

The surveys are alike in that items are broken out by type (dairy, cheese, meat, etc.) and track the Entitlement cost of the items being ordered by the Recipient Agency. Additional surveys may be opened during the year as needed.

When ordering USDA Foods, Recipient Agencies must indicate the number of cases they prefer under "CASES". If interested in additional quantities, the "EXTRA" box may be completed as well. Alaska will try to provide for delivery of products throughout the school year, within the limitation of minimum order requirements by USDA.

Recipient Agencies should exceed their Entitlement by at least 25 percent when selecting items from the surveys by utilizing the "EXTRA" box when ordering. After the surveys close, the State undergoes the balancing process, which may increase or decrease the Recipient Agency request based on minimum and maximum ordering requirements with processors and USDA.

USDA Foods should be ordered in quantities that can be used without waste. Recipient Agencies are encouraged to contact the State if they have excess commodities to arrange transfer to another program.

New surveys are announced through monthly program bulletins. It is important to have all contact information in CNP Web current so that primary program contacts, food safety coordinator, and financial contacts are receiving bulletins and all other necessary notifications.

Invoicing

A per-case administrative program fee is assessed by the State for all USDA Foods ordered by Recipient Agencies. The fee is billed only after receipt of the foods. This fee is reviewed each year and may be adjusted if costs increase or are reduced.

Once a month the State Agency reviews all items received and generates an electronic invoice, which is available to Recipient Agencies through CNP Web.

Invoices should be paid within 30 days. An invoice summary will be mailed once per year to ensure all outstanding bills are paid prior to the end of the program year.

Use of USDA Foods

Food Service Management Companies

A Food Service Management Company (FSMC) may be employed to conduct the food service operations of eligible Child Nutrition Program sponsors. The contract between the sponsor and the FSMC must include, but is not limited to:

1. Any USDA Foods received by the sponsor and made available to the FSMC shall be utilized solely for providing meals to the employing agency's food service operation. It's the responsibility of the sponsor to demonstrate that the full value of all USDA Food is used solely for the benefit of the sponsor. An annual audit is performed by the State requiring that the sponsor submit a monthly invoice confirming that the FSMC is crediting the value of the USDA Foods used.
2. The FSMC is responsible for the security and care of the USDA Foods. Claims for loss, theft, or damage are the responsibility of the FSMC.

3. Schools are responsible for ensuring Federal Regulations are met.
4. The FSMC will keep records for a period of five years from the close of the fiscal year.
5. RA will reconcile FSMC records annually to ensure that all USDA Foods were used.
6. If the FSMC has responsibility to order USDA Foods, it will consult the RA on foods offered and selected.
7. The FSMC may not cash out the value of USDA Foods.
8. All rebates or bonuses must be passed down to the RA.

Use of USDA Foods in the Classroom

Schools may provide any type of USDA Foods for use in training students in home economics classes and nutrition education classes at all grade levels. No charge is to be made for foods transferred to classes. It is recommended that a transfer slip listing the type and amount of USDA Foods be signed by the receiving teacher. USDA Foods should be released to teachers on an as-needed basis. All handling and storage requirements must be met.

Catering

USDA Foods may not be used for catering of school (e.g., school clubs or sports banquets, PTA meetings, etc.) or nonschool functions (e.g., Chamber of Commerce, clubs, political rallies, etc.).

Schools may use USDA Foods for other meal service activity that is operated in the school or under the nonprofit school food service account such as: a la carte sales, school breakfast program, and meals and snacks in residential child care institutions (RCCIs).

Schools contracting to provide meals and/or snacks to elderly programs or childcare centers for a fee are providing a catering service. Schools in this situation may prepare and provide meals containing USDA Foods to childcare centers, but may not claim these children or adults in their average daily participation count or for school lunch reimbursement.

Inventory

Storage Procedures

Any school receiving USDA Foods is responsible for the care of the items. This would include but is not limited to:

1. Checking each delivery of food for possible shortages and damage before the foods are accepted.
   - Refrigerated and frozen products must be examined to ensure that the temperature of the product is adequate and that they are in good condition.
   - Canned foods must be examined to determine if there are any damaged, disfigured, or discolored cases or cans, which might indicate spoilage or deterioration.
   - Foods subject to insect infestation must be thoroughly inspected.
   - Foods found to be out-of-condition must be segregated from other foods and handled in accordance with loss procedures.
2. Taking adequate safeguards to protect USDA foods from theft, loss, or spoilage.
   - There must be no external openings in the structure of the building where foods are stored that would allow rodent and insect infestation.
   - Secure locks should be placed on freezer/coolers and all doors of buildings where USDA foods are stored. This will help prevent theft and vandalism.
3. Freezer/cooler/dry checks. It is recommended that district personnel be assigned to make freezer/cooler/dry checks every day at a minimum and maintain a log of

checks (Appendix I). The log should contain:

- Date of the check
- Time of the check
- Recorded temperature
- Signature of the person conducting the check

This practice must be continued during summer vacation or any other break period if food is maintained in storage. If it is not possible to make these checks on weekends, then they should be made late Friday afternoons and early Monday mornings.

4. The following temperatures should be maintained:

ITEM TYPE	EXAMPLES	RECOMMENDED TEMPERATURES
Frozen foods	Beef	0° F or below
Cooler foods	Cheese	35 to 40° F
Grain product	Flour	50° F or below
Dry storage	Canned goods	70° F or below

5. USDA Foods must be stored off the floor on pallets or shelving and 6 inches away from the wall for proper ventilation.

Loss, Spoiled, or Damaged USDA Foods

USDA has taken steps to more fully integrate USDA Foods with other foods utilized by SFAs in the National School Lunch Program and other nutritional meal programs. Since USDA Foods are packed with commercial labels, instead of USDA labels, regulations were amended to streamline inventory controls. These regulatory amendments are:

- Removed the requirement to maintain inventories of USDA Foods separate from inventories of other foods.
- Removed the requirement that RAs do an annual physical inventory of storage facilities, report USDA Foods found to be lost, stolen, or out-of-condition and excessive inventories and take corrective action as a result of such findings.
- Removed the prohibition against RAs maintain excessive inventories, and the requirement that states determine if RAs USDA Foods inventories are excessive.
- Removed the requirement that RAs maintain records of the receipt, distribution/disposal, and inventory of USDA Foods.

Transfers

Sponsors may transfer USDA Foods to other child nutrition programs participating in NLSP, SFSP, and some CACFP without State Agency approval. However, we request that you contact the State Agency if you have surplus USDA foods for redistribution so we can help find an eligible recipient and facilitate a transfer.

Priority by program is as follows:

1. Schools, Summer Food Service Programs, Child Care Centers, Nutrition Programs for the Elderly
2. Soup Kitchens/Food Banks
3. Charitable Institutions
4. Correctional Institutions

Excess Inventory at Processors (Net Off Invoicing only)

USDA regulations require USDA Foods inventories held at further processors be monitored. The regulations require no more than a six-month inventory level be maintained based on the processor's average monthly usage.

Complaint Procedures

Schools should notify the state agency when there is a concern that a USDA Foods may not be safe for consumption or the quality of the product may not meet generally accepted standards. Schools can print the USDA Foods complaint form off the CNP website, complete, and fax it to CNP at 907-465-8910.

Schools need to provide as much information as possible regarding the USDA Foods. Some key pieces of information include:

- USDA Foods name and code
- Date product received
- Amount received and amount remaining
- Any information from the case or container: Can codes, pack date, box number, and vendor.

Schools should take photos and keep as much evidence of the problem as is practicable.

Food Alerts, Holds, and Recalls

All sponsors will be notified when there is an urgent concern about the safety, wholesomeness, or condition of USDA Foods. Notification will be made expeditiously through email, text, and/or phone call. An immediate hold must be placed on all products covered by this alert until advice on proper disposition is received. After the State Agency receives instructions from USDA, notification will be provided to RAs to either release the foods for program use or instructions for the disposition of unsafe products.

When a product is potentially hazardous, or has not been produced according to specifications, it may be placed on hold by the USDA.

Depending on the severity of the problem and the time the hold is received, a recipient agency may be informed of the hold by one of several methods depending on the severity of the problem.

- Emails will be sent to the National School Lunch Program contact person at each school.
- Notices may be sent by U.S. mail.
- Notices may be sent by fax.
- Phone calls to schools may be placed.
- Recall information will be posted in the program bulletin

If it is determined the product should be recalled, notification to the SFAs is the same as for a hold. There will be additional information regarding how and when disposal of the item will be conducted. Depending upon the quantity at each SFA, schools may be instructed to destroy the product locally in lieu of a pick-up and return.

Child Nutrition Programs may also send out notification from USDA or FDA alerts on food items that are not USDA-donated items. These notifications are for your information only. It is recommended that all food service programs monitor the Alaska Department of Environmental Conservation website for Recalls and Alerts at http://dec.alaska.gov/eh/fss/recallsalerts.html.

Food Distribution Programmatic Reviews

Programmatic Reviews of the FDP are conducted as a part of the National School Lunch Administrative Review. These are conducted at each SFA every three years. The reviewer will monitor the storage facilities, record keeping procedures, and usage.

To ensure that programs are in compliance with USDA regulation 7 CFR 250.51, Food Service Management Company (FSMC) must credit the school or agency for the value of all USDA Foods received for use in the meal service for the school year, including the value

of USDA Foods contained in further processed end products (processed). Crediting may be through invoice reductions, refunds, and/or discounts. Once annually SFAs must provide the state agency a copy of invoicing from the FSMC reflecting the appropriate credit for USDA Foods used in the food service.

Advisory Council

Alaska has an Advisory Council that is made up of a diverse representation of Recipient Agencies. They meet annually in person and as needed via audio conference throughout the year. The purpose of the Council is to provide the USDA Foods Program assistance in special projects, input of food choices, and guidance. All SFAs may contact the state agency to provide input on the array of USDA Foods offered.

Buy American

Buy American is a provision for the contiguous United States. When practicable, it is a best practice for procurement in Alaska as well. When purchasing food with federal funds, recipient agencies in the contiguous United States must purchase food produced in the United States. The USDA defines foods produced in the United States to be:

- An unmanufactured product of United States origin, or
- A product manufactured in the United States

Exceptions to this rule include:

1. Purchases of ethnic or unusual foods
2. Products not produced in the United States
3. United States products whose costs were determined unreasonable through competitive bidding

Disaster Feeding

Release of USDA foods

When a disaster occurs and people are in need of food, disaster relief organizations such as the Red Cross or Salvation Army are responsible for providing this service. When these organizations need food resources, they will contact the state agency for assistance with USDA Foods.

Food and Nutrition Service (FNS) responds to the nutrition needs of disaster survivors through congregate feeding using USDA Foods. Local inventories from schools can be sources of supplemental USDA Foods used by the disaster relief organizations. The request must go through the state agency before any food is accessed for disaster response.

1. Applications by a disaster feeding organization for the use of USDA Foods for congregate feeding must include the following:
   - A description of the disaster, emergency, or situation of distress
   - An estimate of the number of people requiring meals
   - The period of time for which meal are being requested
   - The quantity in cases and types of food needed
2. When authorization has been given by CNP, records should be kept as to the types of food and quantity released or prepared for the disaster relief agency. Complete USDA Foods Feeding Record and submit to CNP within 10 working days after the end of the disaster.

Reources for USDA Foods

NSLP USDA Foods Product Information Sheets https://www.fns.usda.gov/fdd/nslp-usda-foods-fact-sheets

USDA Foods DEED eLearning Module https://education.alaska.gov/eLearning/courses.html

Special Assistance Alternatives: Provision Options

Community Eligibility Provision
Provisions 2
Provisions 3

Community Eligibility Provision

In an effort to reduce paperwork at the local level, USDA provides alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced price school meals and daily meal counts by type (free, reduced price and paid meals) at the point of service. These are the Special Assistance Alternatives and include the Community Eligibility Provision, Provision 2 and Provision 3.

Overview of Community of Eligibility

The Community Eligibility Provision (CEP) is an alternative to using household eligibility applications in high poverty local educational agencies (LEAs) and schools. To be eligible for CEP, LEAs must:

- Meet a minimum level (40%) of their students as Identified Students in the year prior to implementing CEP.
- Agree to serve lunch and breakfast at no cost to ALL enrolled students.
- Agree to cover any costs of providing meals above the amounts provided in federal assistance, with non-federal funds.

LEAs that choose to participate in CEP must not:

- Collect income eligibility applications during the period in which they are participating in CEP.
- Be a Residential Child Care Institution (RCCI).

Reimbursement for CEP schools is based on a claiming percentage that is derived from the percentage of Identified Students as of April 1 the year prior to implementing CEP. The claiming percentage established for the first year of CEP is guaranteed for a period of four school years.

LEAs may update the CEP rate if there is a documented increase in the schools claiming percentage. Any submitted increase to Alaska Child Nutrition Programs after the first year would establish a new base year percentage and new four year cycle. For example:

Year 1	85.46% Free	14.54% Paid
Year 2 – submitted an increase to CNP established a new base year (new Year 1)	91.33% Free	8.67% Paid
Year 2 – no increase provided to CNP	91.33% Free	8.67% Paid
Year 3 – no increase provided to CNP	91.33% Free	8.67% Paid
Year 4 – no increase provided to CNP	91.33% Free	8.67% Paid

Identified Students

In order to be eligible for CEP, an LEA (or group of schools within an LEA), must have a minimum Identified Student percentage of 40% as of April 1 the year prior. Identified Students include the following:

- Directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF) and the extension of benefits to students within the same household
- Directly certified foster child (not through use of a household application). Directly certified foster children do not provide an extension of benefits
- Homeless (certified by homeless coordinator listing)
- Runaway (certified by runaway coordinator listing)
- Migrant (certified by the migrant coordinator listing or through PrimeroEdge Direct Certification transmission)
- Food Distribution Program on Indian Reservations (FDPIR, obtained through PrimeroEdge Direct Certification transmission)
- Head Start (certified by the Head Start coordinator listing)

Identified Students do NOT include the following:

- SNAP/TANF number on an application
- Foster child marked on a household application
- Submission of a household application based on income

The number of Identified Students is the count as of April 1. LEAs can maximize Identified Student numbers by ensuring the annual AND monthly direct certification files are used and that students are provided an extension of benefits when appropriate.

An extension of benefits occurs when any member of a household is found in the PrimeroEdge database system for either SNAP, TANF, or FDPIR. Ensure that you maintain documentation of all Identified Students including all extensions of benefits.

Claiming Meals

Schools that apply to participate in CEP will be provided an approved free and paid claiming percentage based on the number of Identified Students, multiplied by the USDA-established Claiming Factor. The USDA-established Claiming Factor can change annually; for school year 2015–2016 the USDA-established Claiming Factor was 1.6%.

CEP schools will only need to track the total number of meals served each day, and will no longer need to keep track of meals served by free, reduced and paid categories. This same process is done for breakfast and lunch meals served each day. The total number of meals will be broken down into free and paid meals; there will not be any reduced-price meals claimed in CEP schools. Schools in CEP will still need to complete an edit check worksheet form specific to CEP.

Example of determining the approved claiming percentage:

- Number of Identified Students as of April 1: 241
- Enrollment as of April 1: 407
  - 241 Identified Students divided by 407 Total Enrollment = 0.5921376
  - 0.5921376 x 1.6 (Current Claiming Factor) = .94742016
  - 100% - 94.74% = 5.26%.

As a result, 94.74% of all meals are reimbursed at the free rate and 5.26% of all meals are reimbursed at the paid rate.

When completing Claims for Reimbursement in the CNP Web, only the total number of breakfasts and lunches served, total operating days, and total enrolled eligible stu-

dents are reported. The system will apply the approved claiming percentage to that total number of meals and automatically determine how many meals are paid at the free and paid rates.

Determining How to Setup CEP Participation (Site, Group, District)

Participation in CEP can be as an individual site, a group of sites, or district wide. Districts can also choose to have a mixture of individual sites and/or groups of sites within the district. LEAs can determine how to establish site grouping for participation in CEP based on what will be most beneficial to the LEA.

Remember that an individual site, group of sites, or district must meet the minimum of 40% of its students being Identified Students as of April 1. Group(s) will need to add together the number of Identified Students and enrollment from all schools in the group(s) to determine if the group is eligible for CEP. There can be multiple groups within one SFA.

District wide participation in CEP would add together the number of Identified Students and enrollment for all schools in the district. The Identified Students Percentage (ISP) for the entire district must be greater than 40%. Schools are grouped together for CEP purposes will retain their individual site percentage (with claiming factor).

SCHOOL	IDENTIFIED STUDENTS	ENROLLMENT	APPROVED ISP PERCENTAGES	
			Identified Percentage	With Claiming Factor
John Fredson School	59	81	72.84%	100%
Arctic Village School	11	12	91.67%	100%
Circle School	1	10	10.00%	16.00%
Fort Yukon School	61	113	53.98%	86.37%
Grouped together for CEP	**132**	**216**	**61.11%**	**97.78%**

In the example, the LEA has chosen to group together all the schools. The approved ISP percentage for the group will be 61.11%, enhanced to 97.78% by including the USDA claiming factor. Although Circle School has a non-qualifying ISP, as a group with other schools, the ISP meets the 40% required to participate in CEP.

SCHOOL	IDENTIFIED STUDENTS	ENROLLMENT	APPROVED CLAIMING PERCENTAGES	
			Free Percentage	Paid Percentage
John Fredson School	59	81	100%	0%
Arctic Village School	11	12	100%	0%
Circle School	1	10	16%	84%
Fort Yukon School	61	113	86.37%	13.63%
Group together for CEP	**132**	**216**	**97.78%**	**2.22%**

In the example, the approved CEP percentage for the group will be 97.78% free and 2.22% paid, however if Arctic Village School were to apply for a grant the individual percentage of 100% free and 0% paid, would be used.

Impact on Other Programs

Participation in CEP may impact other areas of the school district, areas outside of the meal programs. The main change that will occur with CEP schools is that there will no

longer be eligibility data by individual student. Some programs that may be impacted by the lack of school nutrition student eligibility data include:

- Title I
- E-Rate

For additional assistance go to CEP web page at: https://education.alaska.gov/tls/cnp/cep.html

Title I

The United States Department of Education has issued guidance related to Title I and CEP participating schools; a copy of the letter is available on the Alaska Child Nutrition Programs website.

E-Rate

The Federal Communications Commission has issued guidance related to E-rates and CEP participating schools. A copy of the letter is available on the Alaska Child Nutrition Programs website. For E-rate the guidance states that CEP schools should use the free and reduced eligibility from the year prior to implementing CEP.

Important Dates Related to CEP

- **April 1**: Determine the number of Identified Students, determine enrollment and Application for CEP available
- **August 31**: Deadline to apply for CEP;
- **June 30**: Due date to withdraw from CEP; and due date to increase your claiming percentage.

Provision 2

This provision reduces application burden and simplifies meal counting and claiming procedures. It allows schools to establish claiming percentages and to serve all meals at no charge for a four year period (base year plus three non-base years). It can be used for breakfast and/or lunch. During the base year, the school makes eligibility determinations and takes meal counts by type. During the next three years, the school makes no new eligibility determinations and only counts the total number of reimbursable meals served. Reimbursement during these years is determined by applying the percentages of free, reduced-price and paid meals served during the corresponding month of the base year to the total meal count for the claiming month. Schools participating in this alternative must pay the difference between the Federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than Federal funds. At the end of the four years, a four year extension may be approved if the income of the school's population remains stable or declines.

Currently no schools in Alaska are participating in Provision 2.

Provision 3

This provision reduces application burdens and meal counting and claiming procedures. It allows schools to receive the same level of Federal reimbursement and commodity assistance each year, with some adjustments for a four year period. Schools must serve meals to all participating children at no charge for a period of four years. These schools do not make additional eligibility determinations. Instead, they receive the level of federal reimbursement and commodity assistance paid to them in the base year adjusted by enrollment. For each of the four year cycle, the level of federal reimbursement and commodity assistance is adjusted to reflect changes in enrollment and inflation. The base year is not included as part of the four year cycle. Schools participating in this alternative must pay the difference between the federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than federal funds.

The claiming process for schools in the base year follow standard processes. In the subsequent years schools only enter the operating days and enrollment for the claim process. The participation rate from the base year is applied during each of the subsequent years until a new base year is established.

Residential Child Care Institution (RCCI)

Overview
Student Enrollment
Meal Requirements
Additional Requirements

Overview

This guidance will cover information related specifically to Residential Child Care Institutions (RCCIs) which either currently participate in or would like to participate in the United States Department of Agriculture's School Nutrition Programs. This guidance is a supplement to the Administrative Handbook and is not inclusive of all program requirements. For additional requirements of the School Nutrition Programs please review the complete Administrative Handbook.

General Program Requirements

RCCIs can participate in the School Nutrition Programs provided that the institution:

1. Is public or private nonprofit;
2. Operates principally for the care of children;
3. Is a residential facility;
4. If private, is "tax exempt" under Section 501(c)(3) of the Internal Revenue Code of 1986;
5. If private, is licensed by the state to provide residential child care;
6. Serves those that are age 21 and under.

A public institution is one which is operated by and primarily responsible to any level of federal, state or local government. A private, nonprofit institution is one which is not public and is tax- exempt for federal income tax as described above.

Institutions qualifying as an RCCI eligible to participate in School Nutrition Programs include, but are not limited to:

- Homes for the mentally or physically challenged, emotionally disturbed, or un-married mothers and their infants;
- Group homes;
- Halfway houses;
- Temporary shelters for abused and/or runaway children;
- Long-term care facilities for chronically ill children;
- Juvenile detention centers.

Boarding schools are not considered RCCIs.

The School Nutrition Programs that an RCCI is eligible to participate in include:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Special Milk Program (SMP) (only for children that do not have access to the NSLP)
- And/or the After-School Snack Program (if the RCCI is offering an educational enrichment activity after the school day)

Agreement & Policy Statement with the State Agency (SA)

RCCIs must enter into a written agreement with the SA; this agreement sets forth the conditions for operating the program(s). Both the agreement and the Policy Statement are a part of the online annual application and must be agreed to each year to be eligible to participate.

Student Enrollment

Certification of Eligibility for Meal Benefits

Once the eligibility of the RCCI to participate has been established, it is necessary to establish the eligibility of the children participating at the RCCI. RCCIs must maintain the names, ages (must be under 21 years of age), and entry and departure dates of all participating children in the School Nutrition Programs.

RCCIs participating only in the Special Milk Program (SMP) and receiving only the paid rate are not required to obtain eligibility documentation for participating children. This only applies to the SMP; not any other School Nutrition Programs.

Some RCCIs may have both residential children and day students; requirements for certification are different for each type of student. These are described below.

Institutionalized Children

An institutionalized child is considered as a one-person household since he/she is not living with his/her actual family as an economic unit. The RCCI need not obtain an application or signature from an adult household member. Since an institutionalized child is defined as a family of one, program eligibility for institutionalized children is based on income received by the child; the family's income is not included. Payments from any source directly received by the institution on a child's behalf are not considered as income to the child. Only the income a child earns from employment and/or personally receives while in residence at the institution is considered as income.

In order to properly document the eligibility of institutionalized children, an RCCI may use one of the following methods:

- Eligibility Roster—if the RCCI does not have a predetermined policy which dictates the allowable income to children, then it must record eligibility determinations, by child, on a roster. The roster must include the following information:
- Child's name;
- Child's date of birth;
- Date of eligibility determination;
- Category of eligibility; and
- Approving official's signature/initials.

Documentation of either the Statement of Facts or the Eligibility Roster must be maintained.

Day Students Attending RCCI:

Day students are children who attend, but do not reside in the RCCI. A student's eligibility for free, reduced, or paid meal benefits is determined based on traditional methods of certification. This includes direct certification, a household eligibility application, and/or homeless/migrant/runaway/Head Start documentation. Please refer to the Direct Certification section and Benefit Issuance section for more information on certification of meal benefits.

Documentation must be maintained for the eligibility determination of all day students.

Point-of-Service Counts

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 served free, reduced-price, and paid claimed for reimbursement must have adequate documentation on file to support the claim.

Meals must be counted daily at the point in the food service line where it can be determined that a reimbursable meal, containing all required components, has been served to an eligible student. It is NOT recommended that a student take point-of-service counts. Rather it is preferred that a trained adult, RCCI employee, or volunteer take the counts. Any alternative point-of-service counting methods must be approved by the Alaska Child Nutrition Programs.

Verification

Verification is the confirmation of eligibility to receive free and reduced-price meals under the NSLP and SBP. Verification is only required when eligibility is determined through the use of a household eligibility application. Basically, the verification process involves requesting documentation of information provided on a household application. Once that documentation is received, the Verification Summary Report must be completed and submitted to Alaska Child Nutrition Programs.

The requirements for verification are different for students who reside in the RCCI versus day students (if applicable):

- **Institutionalized Children**—the verification process is not required, due to the fact that children residing in a RCCI do not complete household eligibility applications. However, the Verification Summary Report must be accessed and some general information provided. Instructions regarding information that will be submitted on the Verification Summary Report will be provided annually.
- **Day Students**—the verification process is required. Day students must be certified for meal benefits through direct certification or household eligibility application, therefore the verification process and the Verification Summary Report are required for any day students. Please view the Verification Section of this manual for further instructions.

Menu Planning

The USDA required Food Based Meal Pattern provides for required serving sizes of specific food components based on the grade of the child. The required food components include:

- Meat/meat alternate
- Grains
- Fruit
- Vegetables and
- Milk

Most RCCIs operate seven day per week. Please see below for the meal pattern requirements for seven day a week facilities.

7- SCHOOL WEEK BREAKFAST	GRADE K–5 WEEKLY (daily)	GRADE 6–8 WEEKLY (daily)	GRADE 9–12 WEEKLY (daily)
Fruits (cups)	7 (1)	7 (1)	7 (1)
Grains (oz eq)	10–14 (1)	11–14 (1)	12.5–14 (1)
Fluid Milk (cups)	7 (1)	7 (1)	7 (1)

7–SCHOOL WEEK LUNCH	GRADE K–5 WEEKLY (daily)	GRADE 6–8 WEEKLY (daily)	GRADE 9–12 WEEKLY (daily)
Fruits (cups)	3.5 (0.5)	3.5 (0.5)	7 (1)
Vegetables (cups)	5.25 (0.75)	5.25 (0.75)	7 (1)
Dark Green	0.5	0.5	0.5
Red/Orange	0.75	0.75	1.25
Beans/Peas (legumes)	0.5	0.5	0.5
Starchy	0.5	0.5	0.5
Other	0.5	0.5	0.75
Addt. Vegetable to Reach Total	2.5	2.5	3.5
Grains (oz eq)	11–12.5 (1)	11–14 (1)	14–17 (2)
Meats/Meat Alts (oz eq)	11–14 (1)	12.5–14 (1)	14–17 (2)
Fluid Milk (cups)	7 (1)	7 (1)	7 (1)

Age/Grade Group Exemption

The United States Department of Agriculture (USDA) has released information that allows Residential Child Care Institutions (RCCIs) meeting certain requirements to serve one meal pattern even when the age/grades being served span more than one age/grade group. The age/grade groups are set forth in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.

Specifically, this policy only applies to RCCIs that are:

1. Juvenile detention or correctional facilities;
2. Consist of more than one age/grade group; and
3. Have legitimate safety concerns or State juvenile justice laws or regulations related to offering meals with varying amounts of food within the same meal period.

For these facilities, Alaska Child Nutrition Programs may permit the RCCI to serve NSLP/SBP meals with the same amount of food at the meal service. In such cases, RCCIs shall serve meals meeting the NSLP meal pattern in effect for the highest age/grade group represented, to ensure nutritional adequacy.

If an RCCI meets these requirements and wishes to request implementation of this exemption, approval must be obtained from Alaska Child Nutrition Programs prior to implementing the option. Alaska Child Nutrition Programs will consider RCCI requests to implement this option on a case-by-case basis and must ensure that all three criteria are met. Please contact us for more information on how to submit this request. Each request must include the following information:

1. Name of Sponsor
2. Agreement Number
3. Alaska Child Nutrition Program Site Name(s)
4. A statement(s) stating how this site(s) meets all three of the requirements listed above, as required by USDA.

Other Menu Planning Requirements

There are additional menu planning requirements that are required of all participants in the School Based Child Nutrition Programs that are not specific to RCCIs. For more information on those requirements please review the Menu Planning section of this handbook.

Additional topic areas in the Menu Planning section include:

- Daily Production Records
- Standardized Recipes
- In-depth information regarding each of the five required food components
- Whole Grain Rich requirements
- Offer vs. Serve
- Meal pattern requirements for the After School Snack Program

Additional Requirements

On-Site Review Requirements

National School Lunch Program (NSLP) regulations require each school food authority (SFA) with more than one site where reimbursable meals are served to annually conduct their own review of each site's meal count and claiming procedures. Alaska Child Nutrition Programs recommends RCCIs with one site perform an annual on-site review of meal counting and claiming procedures.

Although only required for NSLP, we recommend you review both NSLP and SBP, especially if meal service times have different staff performing the meal counting function.

This review must be completed by February 1 of each school year for each site. The individual conducting the site review should be familiar with program rules and should be outside the daily operations to provide an objective look at the meal service. The review must be conducted by RCCI personnel and may not be conducted by contracted parties who are providing the meal service. A sample copy of the On-Site Review Form is available on our website.

A copy of the on-site review must be maintained on file at the site or RCCI office for three years plus the current year, or in the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed.

If the review disclosed problems, the RCCI must correct problems immediately and conduct a follow-up review within 45 calendar days of the initial review. A follow-up review must be conducted to determine if the corrective action resolved the problem. Written documentation is required to be maintained at the RCCI or at the site.

On-site reviews are conducted to ensure at each meal service claimed, the following internal controls are operating correctly:

- Daily meals counts by category are taken at the point of service
- All meals claimed meet meal pattern requirements
- Overt identification is prevented of student's eligibility status
- Sanitation procedures are followed

Local Wellness Policy

Any RCCI that participates in a program authorized under the National School Lunch Act or the Child Nutrition Act must establish a Local Wellness Policy with the objectives of:

- Setting goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness
- Setting nutrition guidelines for all foods available on facility campus during the school day
- Assuring nutrition guidelines for meals will not be less restrictive than federal policy
- Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and review and update of the local wellness policy
- Inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policy
- Be measured periodically on the extent to which schools are in compliance with the local wellness policy and the progress made in attaining the goals of the wellness policy, and make this assessment available to the public

Acceptable methods for informing and updating the public may include dissemination of printed or electronic materials to families of school children and other members of the community at the beginning of the school year and/or posting on the district or school website. Whatever method is chosen, the information must be made available to the public by LEAs in an accessible, easily understood manner.

For additional guidance on the requirements of the Local Wellness Policy including templates and the required evaluation process, visit https://education.alaska.gov/TLS/CNP/wellness.html.

Financial Oversight

Claims for Reimbursement
Records Retention
Nonprofit School Food Service Account
Revenue from Non-Program Foods
Meal Pricing
Unpaid Meal Charges
Procurement
Indirect Rates

Claims for Reimbursement

SFAs receive federal reimbursement for approved meals served to students by filing a Claim for Reimbursement in the CNP Web. To ensure prompt payment, it is recommended that claims be submitted by the 15th of the month following the claim month. For example, the Claim for Reimbursement for the month of October should be submitted by November 15.

Federal regulations require that all valid final claims to be submitted no later than 60 calendar days following the last day of the full month covered by the claim. This applies to all original claims and upward claim amendments. There is no deadline for downward claim amendments. Please note that Claims for Reimbursement that include the Fresh Fruit and Vegetable Program grant, will not be paid until back-up documentation is received by Child Nutrition Programs.

Claims for Reimbursement are completed at the site level by inputting the total number of meals by category, operating days, and adult meals served. Once all of the site claim data has been submitted for each site, if applicable the SFA will input the Fresh Fruit and Vegetable Program claim data (operating days, and operating and administrative costs) in the sponsor claim form. The SFA must certify the Claim for Reimbursement at the sponsor level to have the claim submitted to the state agency.

Provision Schools

Provision 3 and Community Eligibility Provision do not require the same counting and claiming processes. While much of the CNP Web entry is similar, there are a few differences for these special assistance programs for the Site Claim only. Once the Site Claims are in “Pending Submission” status, the Sponsor Claim is submitted as described previously.

Provision 3

During the base year, point of service meal counts and the claim process are the same as for other schools. During the subsequent years only the fields for Adult Meals Served, Days of Operation, and Total Eligible Children are input on the Site Claim form. After these sections are in “pending submission” status, the Sponsor Claim would be complete.

Community Eligibility Provision

The site claim for each school under the Community Eligible Provision will include only the fields for the Total Reimbursable Student Meals for breakfast and lunch, Adult Meals Served, Days of Operation, and Total Eligible children. If the site is also participating in the snack program, these fields should also be input as applicable,

Claim Revisions

Claims can be edited prior to being submitted for payment. Any changes made prior to submission are not tracked by the CNP Web, however claims revised after the

original has been paid are tracked in the system and are visible to the SFA and the state agency. The current date determines the claim month(s) that the CNP Web is available to accept claims; the system does not allow for claims to be submitted in the current month even if you have concluded program operations (i.e. you cannot submit a claim for reimbursement for May until June). If you need to submit a claim for the previous program year, change the program year in the CNP Web before starting this procedure. When you finish, remember to change the program year back to the current program year before performing other CNP Web functions, however Claims for Reimbursement may not be submitted after the 60-day deadline. To request a Late Claim Exception, please contact the state agency.

Claim Status

Each claim submitted will be in one of the following status types:

Error: The claim for reimbursement has an error at the sponsor or site level. The CNP Web will provide you information on where and why the error has been triggered. The Claim for Reimbursement must be revised by the SFA and submitted for processing.

Pending Submission: The claim for reimbursement has been started by the SFA but has not been submitted to the state agency. Claims in pending submission status cannot be processed by the state agency.

Pending Approval: The claim has been submitted to the state agency for review.

Paid: The state agency has reviewed and approved the claim for reimbursement. Payment information has been submitted to finance. This process may take up to 30-days. To verify payment please check the State of Alaska Vendor Self Service portal at http://doa.alaska.gov/dof/iris/vendor.html

For access and a tutorial for the CNP Web, please see our website at https://education.alaska.gov/TLS/CNP/NSLP3.html

Records Retention

Documentation related to the school-based child nutrition program must be maintained on file at the site or the SFA office for the current year, plus three years prior. In the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed. Documentation refers to any materials related to certification, verification, benefit issuance and claiming, including but not limited to: Household Eligibility Applications, verification letters to families, verification documents received from families, submitted menus, production records, training records, meal counts, claim for reimbursement, accounting records, and procurement.

Nonprofit School Food Service Account

Revenue

Revenues received by the nonprofit school food service area are to be used only for the operation or improvement of such food service, except that such revenues shall not be used to purchase land or buildings or to construct buildings.

The SFA shall limit its net cash resources to an amount that does not exceed three months average expenditures for its nonprofit school food service.

Expenses

Costs charged to the nonprofit school food service account must be both necessary and reasonable. In some circumstances, the cost of minor quantities of foods of minimal nutritional value (FMNV) used to decorate or enhance a food or menu item is allowable. Any other costs of FMNV for service in the food service area during meal periods must be disallowed.

If school food service account funds are used to purchase FMNV for sale outside a meal period(s) or outside a food service area(s) during meal periods, such purchases must be self- sustaining. This means funds must be deposited in the school food service account in an amount sufficient to cover all direct and indirect costs relating to the purchase and service of FMNV with school food service account funds. Records documenting the recovery of these costs must be maintained and available for review.

Personnel costs for staff may not be cost allocated; all staff expenses must have documented records reflecting actual time spent working in the nutrition programs.

Uncollected debts, such as unpaid meal charges, are not an allowable expense.

USDA requires that State Agencies now conduct a Resource Management Review as a part of the Administrative Review on districts who transfer general funds into the non-profit school food service account to help in covering expenses in excess of revenues. This process includes a review of the Statement of Revenue and Expenses and supporting documentation of revenue and expenses to determine compliance with USDA requirements.

Revenue from Non-Program Foods

School food service account funds are intended to purchase food for reimbursable meals. The purpose of the Non-Program Revenue requirement is to ensure revenues from the sales of non-program foods cover food cost in the SFA food service account.

Non-program food includes, but is not limited to:

- A la carte items
- Adult meals
- Fundraisers
- Vending machines
- Seconds of entrée items* (not fruits or vegetables)

* This would not include accidental over production and service of meal items which total less than 10 percent of total meals prepared. (i.e. 100 meals prepared, only 90 kids eat lunch. The remaining 10 meals could be served as smaller portions to students at no cost.)

Pricing of Non-Program Foods and Beverages and Adult Meals

Any food or beverage sold in a participating school outside of the reimbursable meal and purchased using school food service funds is considered a competitive food including a la carte items, second entrees, vending, and school stores. (See section entitled Competitive Foods and A La Carte Sales.) The USDA requires that each SFA limit competitive foods to encourage consumption of the reimbursable meals.

Therefore, when pricing non-program items and adult meals, the SFA must set prices at a level high enough to:

- Encourage students to select the reimbursable school lunch or breakfast meal, and
- If food is purchased using school food service funds, generate at least the same proportion of SFA revenues as they contribute to the SFA food costs. The price must recover all the costs involved in the item including labor, overhead, paper supplies, value of USDA-donated foods used in preparation, etc. and should reflect a profit on the item.

Example: **IF:**

The total operating costs (food, labor, paper products, overhead, etc) is $800,000 of which

$400,000 is for food ($50,000 non-program foods and $350,000 reimbursable meals). The total revenue is $800,000.

THEN:

The proportion of non-program food cost is 12.5% ($50,000/$400,000). Therefore, the required revenue from non-program foods would need to be at least 12.5% of total revenue or $100,000 (.125 x 800,000).

Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may, at the discretion of the school food authority, be furnished at no charge. As such their costs may be fully attributed to and supported by the nonprofit food service operation. Meals served to these adults may not be claimed for reimbursement or counted towards the donated foods entitlement. Charges for meals served to adults who do not operate or administer the school nutrition programs are not considered an allowable expense. SFAs must track all adult meals and determine if they are allowable or unallowable. Unallowable meals must be offset by charges to the adult or other non-federal funds.

All students must be charged the same price for each non-program food and beverage regardless of the eligibility status of the student; only the reimbursable meal must be provided free or at a reduced price for those that qualify. All students may be charged for second entrees according to the established price set by the SFA.

A Non-Program Food Revenue Tool was created to help SFAs calculate the amount of revenue required and is available at http://www.fns.usda.gov/cnd/governance/Policy-Memos/2011/SP39-2011ar.xls. Use the Non-Program Revenue Tool to:

- Ensure that a high enough fee is being charge to cover the cost of non-program foods.
- Ensure that enough money is being contributed from the general fund into the school food account to cover the cost of seconds.

Meal Pricing

Pricing of Free Meals

Children eligible for free meals must be offered one reimbursable meal at no charge. Second meals cannot be claimed for reimbursement.

Pricing of Reduced-Price Meals

Children eligible for reduced-price meals must be offered one reimbursable meal at reduced rate. Second meals cannot be claimed for reimbursement. The current maximum prices for reduced-price meal are:

- 40 cents for lunch
- 30 cents for breakfast

Pricing of Paid Meals

Meals under the Child Nutrition Program must be priced as a unit. Individual foods sold a la carte or priced individually cannot be claimed for reimbursement, even though the student may choose food items similar to a reimbursable meal.

Paid breakfast and after-school snack prices are at the discretion of the local SFA. Some basic considerations before establishing a price for a paid student: daily revenue, cost of food, cost of labor (including per hour fringe benefits) and cost of overhead and any other costs.

Paid lunch prices are established using the Paid Lunch Equity (PLE) calculator. School Food Authorities must ensure that schools are providing the same level of support for paid lunches as they are for free lunches. Therefore, weighted average price across the SFA charged for paid meals must be at the least the difference between the current year's free and paid reimbursements. The SFA may however charge more for paid lunches.

If a district is charging on average less than $4.51 [difference between federal reimbursement provided for free lunches ($ 4.99) and the federal reimbursement provided for paid lunches ($.48)] for a paid lunch in School Year 2015–2016, it must make up the difference in the level of funding to the program by:

1. Gradually increase paid meal prices. The USDA cannot require a school to increase by more than $0.10 per meal, however a district can increase by as much as it feels is warranted to meet program requirements. The district need not increase paid meal

prices across all schools. In other words, paid lunch prices can vary by school (e.g. charging lower prices in lower-income area or charging lower prices in elementary vs secondary) as long as the average revenue requirement is met across the district.

OR

2. In lieu of raising prices, provide additional non-federal support (state and local funding) to the non-profit food service account to make up the difference.

OR

3. Combination of increasing price and contributing non-federal funds to the non-profit school food service account.

PLE is determined by CNP each spring and provided to SFAs. SFAs must confirm the results with CNP.

Reimbursement for Off-Site Meal Consumption

Program regulations clearly intend for meals reimbursed under the programs to be served and consumed as part of the school program, on school or school-related premises.

Meals must always be served to students that have been determined to be eligible for free meals under federal income guidelines if the student attends a school participating in the school-based child nutrition program. This includes students on field trips, involved in work study programs, and placed in alternative settings.

Meals served to any students off-site may only be claimed for reimbursement under the following conditions:

- **School Supervised Field Trips** The school may be reimbursed for meals served on a field trip if the function is a part of the curriculum (not an extra-curricular activity) and the meal meets the meal pattern requirements (including milk). Meals served off-site should be subject to especially stringent sanitary and precautionary measures to avoid contamination and spoilage. If all students are offered the reimbursable meal, the school may claim for reimbursement.

Unpaid Meal Charges

Per USDA, students eligible for reduced-price or paid meals must be provided a meal if they have money at the point of sale to pay for the current meal. Schools may deny a reduced-price or paid student if they do not provide the required payment for that meal.

By school year 2017-2018 all districts must have a policy on unpaid meal charges. USDA encourages districts to adopt policies that allow children to receive the nutrition they need to stay focused during the school day, minimize identification of children with insufficient funds to pay for school meals, and maintain the financial integrity of the non-profit school food service account. However, the specific policy is at the discretion of the district. Policies may allow students to charge all types of available reimbursable meals, offer alternate meals, impose a limit on charges, or allow neither meal charges nor offer alternate meals. Additionally, policies may be consistent for all students or vary based on student grade levels.

Districts must establish policies regarding the collection of delinquent meal charge debt in the written meal charge policy. In establishing policies regarding collection of delinquent debt, districts are encouraged to consider the benefits of potential collections in the context of the costs that would be incurred to achieve those collections. Unpaid meal charges are not an allowable expense for the nonprofit food service account per 2 CFR 200.426. While bad debt must be written off as an operating loss, this particular operating loss must be restored using non-Federal funds. These funds may come from the school district's general fund, special funding from State or local governments, school or community organizations, or any other non-Federal sources

Procurement

The United States Department of Agriculture has implemented regulations for the procurement of food and supplies for sponsors of the NSLP, SBP, SMP, and Fresh Fruit and Vegetable Program (FFVP). The chart below provides the specific citations and provisions in the law.

	NSLP	CACFP	SFSP
Program Procurement Regulations	7 CFR 210.16 & 21; 7 CFR 215.14a; and 7 CFR 220.16.	7 CFR 226.22	7 CFR 225.17
Universal Procurement Regulations		2 CFR 200.318-326	
Allowable Costs	2 CFR 200.400 USDA Policy Memo SP07-2015	2 CFR 200.400 Guidance FNS 796-2 rev 4 USDA Policy memo CACFP 03-2015	2 CFR 200.400 Guidance FNS 796-4 USDA Policy memo SFSP 02-2015
Micro Purchase Threshold	Aggregate purchases below $3,500		
Small Purchase Threshold	Lesser of $150,000; unless using state funds or SFA has a more restrictive threshold		
Formal Purchase Threshold	Purchases $150,000 or greater and all NSLP Food Service Management Contracts		
Geographical Preferences	Geographical preferences is permitted for unprocessed, locally grown or raised agriculture products		

General Procurement Requirements

All procurement transactions must be conducted in a manner that provides maximum open and free competition. Procurement procedures must ensure they do not foster noncompetitive practices between firms, do not create organizational conflicts of interest, and do not restrict or eliminate competition. Procurement must not place unreasonable requirements on firms, require unnecessary experience, or establish unrealistic bonding requirements. Cost plus a percentage of purchase is not an allowable system. There must be descriptions of all products purchased, and identical instructions provided to all potential vendors.

Formal standards of conduct must be in place and should govern the performance of officers, employees, and agents in the award and administration of contracts. These standards should provide that officers, employees, or agents should not solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties of sub-agreements.

SFAs must have written selection procedures for awarding contracts. Records should be maintained to detail the significant history of procurement. These records must include, but are not necessarily limited to, the following: rationale for the method of procurement, contractor selection or rejection, basis for the cost or price, and documentation for change orders.

All SFAs must have a procurement plan which provides documentation to ensure free and open competition in purchasing, transparency in transactions, comparability, and documentation of all procurement activities. The procurement plan can outline all processes to ensure that procurement is held to high standards. SFAs may develop their own procurement plan or they may see CNP website at https://education.alaska.gov/TLS/CNP/procurement.html for a template. The procurement plan must include a policy

to determine the allowability of costs to ensure that they are necessary and reasonable for proper and efficient administration of the program(s), allocable to federal awards applicable to the administration of the programs(s), and authorized and not prohibited under state and local laws.

Purchasing Methods: Micro Purchasing

The Uniform Grant Guidance (2 CFR 200) allows for a simplified procurement procedure if the aggregate amount does not exceed $3,500. The micro purchase option expedites the completion of lowest-dollar small purchase transactions and minimizes associated administrative burden and cost as a simpler purchasing method.

The process begins by asking if the single, aggregate purchase is equal or less than $3,500. If so it may be considered a micro-purchase. To the extent practicable, micro-purchases must be distributed equitably among qualified suppliers and may be purchased without competitive price quotes as long as the price is considered reasonable by the entity doing the purchase.

Purchases may not be split for the deliberate attempt to make each purchase below the $3,500 limit. SFAs may get a better price if using another method that allows for more competition. It is important to note that the Federal $3,500 threshold applies to the same vendor for each purchase. For example, if an SFA purchases products from local grocery store (A) and the aggregate value does not exceed $3,500, products can be made solely from grocery store "A" during this purchase activity. However, when the next purchase procedure is completed, the agency will need to use another qualified grocery store for the purchases to distribute the purchases among all qualified suppliers. These purchases must be necessary for program operations, and must be documented to identify the products or services purchased and the price must be considered reasonable.

Purchasing Methods: Small Purchase

The small purchase procedures are required for purchases greater than $3,500 and do not cost more than $150,000. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources (two or more) and result in a purchase or firm fixed price contract. Products and services purchased must be documented to include product specifications, quotes or rates, and to whom the purchase was made or awarded. There are two methods to conduct the quote process: market basket study or individual quotes.

1. **Market Basket Study**

   Market basket studies must be conducted no less than annually. To conduct this study, quotes must be obtained for at least the top 20 items used in the school food service program. These are not just the top items purchased but as well make up a significant portion of your purchasing budget. Quotes may be obtained by going to the grocery store, online catalogs, or directly from the vendors; the quotes must be documented. If you are working with an out of town distributor or vendor, please include transportation costs.

   The Market Basket Study is a simplified method to document and allows program operators to make purchases without getting individual quotes for each purchase throughout the year.

2. **Individual Quotes**

   When the purchase price has been estimated to fall within the applicable small purchase threshold, written specifications must be developed, and the SFA obtains quotes from two or more responsible and responsive vendors. The procedures must be documented to ensure vendors are quoting prices for the same specified product or service, the product/service specified is provided, and the price quoted is the price charged. In short, this ensures program integrity in all purchases, even small purchases.

Purchasing Methods: Formal Procurement

Formal procurement processes must be followed for all purchases exceeding $150,000, and also for NSLP Food Service Management Contracts for any total amount. SFAs may establish a lower threshold for formal procurement. Only two methods are authorized by regulations: Sealed bids (Invitations for Bid) and Competitive Proposals (Requests for Proposal). Both of these methods require public advertising to receive responses.

Both Sealed Bids and Competitive Proposals may result in fixed price contract, but only competitive proposals may result in a cost reimbursable contract.

	Competitive Sealed Bid (IFB)	Competitive Proposals (RFP)
Federal Regulations	2 CFR 200.321(c)	7 CFR 200.320(d)
Description	IFB results in a contract awarded to the most responsive and responsible bidder based on price.	The RFP describes how technical and cost factors will be considered in making the final determination for the purchase of goods and services.
When to use	• A complete, adequate, and realistic specification or purchase description is available • Two or more responsible bidders are willing and able to compete effectively for the business • The procurement lends itself to a **firm fixed price contract** awarded to the most responsible and responsive bidder made principally on the basis of price	Use when there are uncertainties involved in the contract performance affecting price estimates
Elements of the solicitation	• A clear and accurate description of the technical requirements for the material, product, or service to be procured • A statement of the qualitative nature of the material, product or service to be procured • Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description may be used.	
Specific elements	Must define the items or services in order for the bidder to properly respond	• All responses to RFP must be considered to the maximum extent practical • SFA must have a written method for conducting technical evaluations of the proposals received and for selecting recipients • Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered
How to Solicit	Public solicitation	Public solicitation and must include evaluation factors and their relative importance
Evaluation factors	Identify all requirements which the responders must fulfill and the criteria to be used in evaluating bids or proposals, including geographic preference if applicable	
Contract Type	A fixed price contract	Either a fixed price contract or a cost reimbursable contract

Bid Document Development

Federal regulations, 2 CFR 200.319, prohibit the awarding of contracts to any person or entity that develops or drafts specifications, requirements, statements of work, invitations for bids, requests for proposals, contract terms and conditions, or other procurement documents. In failing to fulfill its responsibilities to draft its own specifications and procurement documents, an SFA which copies a list of features or evaluation and ranking criteria drafted by a potential vendor and then permits that potential vendor to submit a bid has violated federal regulations. This pertains to all Child Nutrition Program procurements, including software acquisitions.

While SFAs have broad discretion in gathering information for use in connection with procurement, information from potential bidders must be appropriately modified to develop tailored specifications; otherwise these bidders must be excluded from competing for such procurements. This is to ensure objective contractor performance and eliminate unfair competitive advantage.

	Fixed Price	Cost Reimbursable
Differences	• Provides a stated price that is fixed • Provides the maximum incentive for the contractor to control costs and perform effectively • Imposes the **least administrative burden** on the contracting parties • May contain an economic price adjustment tied to an appropriate index but must be in the solicitation • Price is fixed for the contract duration • Contract duration may be less than one year depending on market conditions	• Provides for payment of allowable costs incurred in performing the contract • Use when there are uncertainties involved in the contract performance affecting price estimates • Frequently occur in the School Nutrition Programs as cost plus fixed fee contract • Provides for the reimbursement of allowable costs **plus** the payment of a fixed fee to the contractor • FSMCs may not be Cost Reimbursable
Awards	• Will be made in writing to the lowest responsive and responsible bidder • Rebates, discounts and credits do not have to be returned to the agency as the vendor factors this into the price they are willing to "fix" for the contract period • Any or all bids may be rejected if there is a sound documented reason	• Allowable costs will be paid from the nonprofit food service account net of all discounts, rebates and other applicable credits accruing to or received by the contractor • Must identify the method it will report discounts, rebates & credits • Must maintain documentation for contracting agency, state agency or USDA • Must separately identify for each cost submitted for payment to the sponsor the amount of that cost that is allowable and unallowable

Required Contract Provision

2 CFR 200 Appendix II requires that all contacts include the following information:

- Administrative, contractual, or legal remedies
- Termination clause
- Equal Employment Opportunity Executive Order 11245
- Copeland Anti-Kickback
- Davis-Bacon
- Contract Work Hours and Safety Standards
- USDA, CNP or Comptroller General of the United States may look at all records pertinent to the contract

- Clean Air and Water Act
- Byrd Anti-Lobbying
- Section 6002 of the Solid Waste Disposal Act
- Certification of debarment and suspension of vendors. Methods for compliance with suspension and debarment include one of the following:
- Checking the System of Awards Management (SAM) system which lists all suspended and debarred organizations
- Collecting a certification form from the organization stating that they are not suspended or debarred; or
- Include a suspension and disbarment clause in the contract and solicitations.

Bid Protests

Any action which diminishes open and free competition seriously undermines the integrity of the procurement process and may subject an SFA to bid protests. SFAs are responsible for properly responding to protests and concerns raised by potential contractors. Pursuant to 2 CFR 200.318, SFAs must have protest procedures in place to handle and resolve disputes relating to their procurements and must in all instances disclose information regarding a protest to CNP.

Food Service Management Company/Vended Meals Contracts

There are separate bidding requirements, which are not discussed in detail here, for SFAs contracting with food service management companies (FSMC) for management services or vended meal services. Please visit our website for detailed information.

While NSLP regulation 7 CFR Part 210.16 permits an SFA to contract with an FSMC to manage its school food service operations, the regulations prohibit delegation of certain duties. It is the SFA's responsibility to ensure its food service operation is in conformance with the SFA's agreement under the program. The SFA is responsible for:

- Observing limits on the use of nonprofit food service revenues including the use of nonprofit food service account funds, to pay only allowable costs regardless of the costs billed by the FSMC
- Determining and verifying the eligibility of children for free and reduced-price meals;
  - Ensuring only reimbursable meals are included on the Claim for Reimbursement regardless of the number of meals billed by the FSMC
  - Not permitting the accrual of all income and expenses to the FSMC
  - Ensuring the validity of meal counting and claiming systems at the schools under its jurisdiction. An SFA is required to have specific procedures in place to determine the validity of meals claimed for reimbursement, including conducting an on-site review of each school prior to February 1 of each school year. If the review identifies problems with a school's meal counting or claiming procedures, the SFA shall ensure the school implements corrective action and, within 45 days of the review, the SFA must conduct a Follow-Up Review to determine if the corrective action resolved the problems. Whether an SFA self-operates its food services or uses an FSMC, the SFA must conduct the On-Site Review and remains responsible for ensuring deficiencies are identified and effective actions are taken to correct any deficiencies found. This may not be delegated to the FSMC
  - FSMCs may not limit an SFA to order USDA Foods for use in the service delivery
  - FSMCs must credit SFA for USDA Foods used in service delivery

Multi-Year Contracts

Multi-year contracts with price changes in the second and subsequent years are allowed provided that:

- The original contract is formally bid and competitively solicited in accordance with federal and state regulations.
- The Invitation to Bid document clearly states price changes will be permitted after the first year of the contract.
- The maximum duration of the contract is specifically stated in the Invitation to Bid document.
- All terms and conditions of the contract remain constant during the duration of the contract.
- The contract specifically states federal funding is not guaranteed beyond the end of the federal fiscal year.
- Strict limitations are placed on any price escalation by linking price increases to a recognized measurable index (such as the consumer price index or a market index). Flat percentages may not be used to define a maximum allowable increase, but may be used to cap or limit an increase that is linked to a recognized measurable index.
- Vendors are required to document, through cost/price analysis, the need for price increases.

Geographic Preferences

Federal regulations require procurements to be conducted in a manner that allows for free and open competition. Therefore, a school food authority (SFA) cannot impose geographic restrictions on potential bidders, with one exception. Geographic preference may only be applied to the procurement of unprocessed agricultural products which are locally grown and locally raised, and that have not been cooked, seasoned, frozen, canned, or combined with any other products. Some handling and preparation is allowable in order to present an agricultural product to an SFA in a useable form as long as the product retains its inherent character.

Handling and preservation techniques that are permissible include: cooling; refrigerating; freezing; washing; packaging (such as putting eggs in a carton); vacuum packing and bagging (such as placing vegetables in a bag); drying/dehydration; applying high water pressure or "cold pasteurization"; butchering livestock, fish and poultry; pasteurizing milk; and adjusting the size through reduction made by peeling, chopping, cutting, slicing, dicing, grinding, and shucking.

While a geographic preference may be used to encourage the purchase of locally grown and locally raised products by enabling SFAs to grant an advantage to local growers, this provision does not eliminate the requirement for procurements to be conducted in a manner that allows for free and open competition as noted previously. A geographic preference must not be defined in a manner that unnecessarily restricts free and open competition. In addition, while SFAs are permitted to apply a geographic preference for the procurement of locally grown and locally raised unprocessed agricultural products, SFAs are not required to do so. The SFA has the discretion to determine whether and how a geographic preference meets its needs.

Procurement Questions and Answers

Question: If I purchase FSMC services or supplies for the food service program, at what level is a competitive procurement required?

Answer: All FSMC bids must be competitive regardless of the total cost.

Question: Can SFAs split up large purchases into smaller amounts in order to fall below the small purchase threshold?

Answer: No, SFAs cannot intentionally split purchases in order to fall below the Federal, State, or local small purchase threshold in an effort to avoid more rigorous procurement practices.

Question: An SFA is able to conduct procurement under the small purchase threshold. Can the SFA procure unprocessed locally grown or locally raised agricultural products directly from a local farmer or local market?

Answer: Yes; however, the procurement must be conducted in a manner that maximizes full and open competition. According to Federal regulations, the SFA can conduct procurement under the small purchase threshold if the procurement is under $150,000 in value. The SFA should put the quantity, quality, and type of goods in writing before contacting any potential offerors. When using the small purchase threshold, quotes must be obtained from two or more sources who are eligible, able, and willing to provide the unprocessed locally grown or locally raised agricultural product. Contacting two or more vendors ensures that an adequate number of potential offerors will be afforded the opportunity to respond to the solicitation, maximizing full and open competition.

Question: What is meant by "distributing micro-purchases equitable among qualified suppliers"?

Answer: SFAs may not always purchase from only one source. Purchases must regularly be made using available qualified sources to the extent practicable. This provides qualified sources the opportunity for business

Question: For multi-year contracts with a vendor, such as a three-year contract where the cost per year is $2,000, for a total contract amount of $6,000. Is the threshold determined by the cost per year or by the total contract amount?

Answer: Given the $6,000 value of the procurement transaction as a whole, the small purchase standards apply, and since the micro-purchase threshold of $3,500 is exceeded, small purchase procedures must apply.

Question: If a small SFA shops at a retail grocer weekly, and their bill is less than $3,500, should they be comparing prices and selecting the store with the lowest prices, or is it a micro-purchase and they should be going to different grocery stores so purchases are distributed equitably among suppliers?

Answer: Price comparisons are not required for micro-purchases as long as the agency considers the price to be reasonable. However, the agency must, to the extent practicable, distribute these purchases equitably among qualified suppliers. You cannot purchase from only one vendor under micro-purchasing, even if you "know" it is cheaper, unless you only have one store in your community.

Question: Which purchases are considered micro-purchases? What about regular weekly purchases for perishable foods or non-perishable foods.

Answer: A program operator may purchase products and services whose aggregate costs does not exceed $3,500 in a single transaction regardless of what is being purchased. Where appropriate, analysis to determine the most economical approach should be made. For example non-perishable products can be purchased in much larger quantities and may be consolidated into a single purchase, whereas perishable products cannot.

However, as a reminder, you may not deliberately split up purchasing to reach amounts under the threshold.

Question: What is considered a transaction?

Answer: An occurrence in which two or more entities exchange goods, services, or money between or among them under an agreement formed for their mutual benefit.

Question: What is the purpose of micro-purchasing if it is limited to $3,500 in aggregate for the fiscal year?

Answer: Procurement by micro-purchasing is not limited to $3,500 in aggregate for the fiscal year, but is aggregate per transaction.

Indirect Rates

SFAs must adhere to the Federal regulations and determine whether a cost is allowable, allocable and charged appropriately as a direct or indirect cost, in order to safeguard the financial integrity of the nonprofit school food service

The full cost of a program, function or activity includes both direct and indirect costs. The determining factor in distinguishing a cost as direct or indirect is the extent to which it can be identified with a specific program, function, or activity that benefits from the SFA having incurred the cost rather than the nature of the goods and services themselves.

- Direct costs are incurred specifically for a program or other cost objective, and can be readily identified to a particular objective such as school food service.

  Examples of direct costs in SMPs include, but are not limited to, food, the wages and salaries of the staff working in the school food service, and supplies specifically used in the school food service.

- Indirect costs are incurred for the benefit of multiple programs, functions, or other cost objectives and therefore cannot be identified readily and specifically with a particular program or other cost objective.

  Examples include administrative overhead functions such as fringe benefits, accounting, payroll, purchasing, facilities management, utilities, etc.

To apply indirect rates, an SFA must have an approved Indirect Cost Proposal and must not pay for direct costs that are covered in the indirect rate through cost allocation. For more information on using an indirect rate in school meal programs, see the USDA guidance at http://www.fns.usda.gov/indirect-cost-guidance.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

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