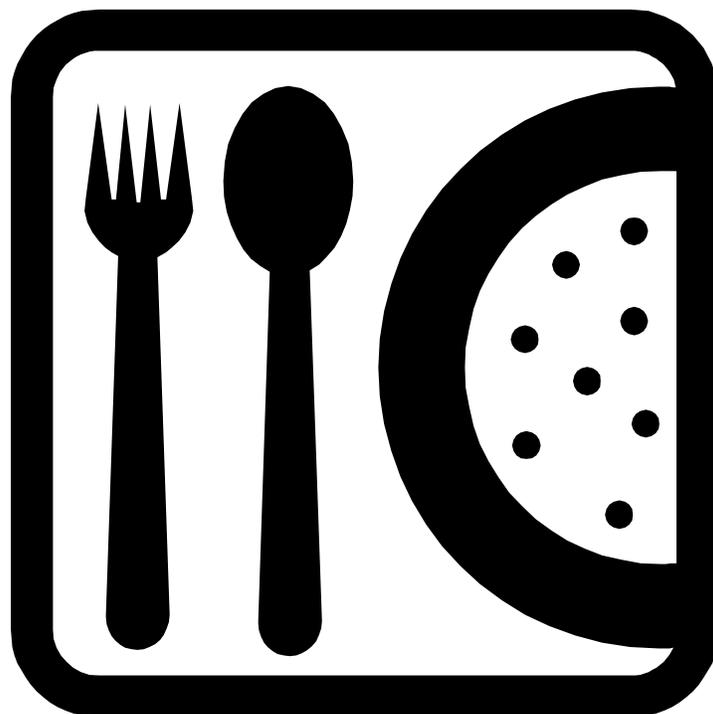


RCCI Manual

Child Nutrition Program Guidance
for
Indiana Residential Child Care Institutions



FORWARD

This manual contains information for Residential Child Care Institutions (RCCIs) which either participate or would like to participate in the National School Lunch Program (NSLP), and/or the School Breakfast Program (SBP), or the Special Milk Program (SMP). Since numerous procedures are unique to RCCIs, we felt that it would be helpful to incorporate regulations, instructions, and guidance into one manual for easy reference.

All School Nutrition Programs (SNP), including NSLP, SBP, and SMP, are administered by a State Agency (SA), which in our state is the Indiana Department of Education, School and Community Nutrition Program. You are encouraged to contact the SA with your questions or for on-site technical assistance.

This manual is based on information developed by the Indiana Department of Education, School and Community Nutrition.

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INTRODUCTION

History

Since 1946, the National School Lunch Program has provided financial support and federally purchased commodities to help schools serve nourishing, well-balanced meals to children. The Child Nutrition Act of 1966 expanded the program to include breakfast. Of particular importance is the amendment to the National School Lunch Act in 1975 which extended eligibility to include residential child care institutions (RCCIs).

Purpose

The purpose of all Child Nutrition Programs is stated as policy in the National School Lunch Act:

It is hereby declared to be the policy of Congress, as a measure of national security to safeguard the health and well-being of the Nation's children and to encourage the domestic consumption of nutritious agricultural commodities and other food, by assisting the States, through grants-in-aid and other means, in providing.....for the establishment, maintenance, operation, and expansion of non-profit school lunch programs.

The benefits of sponsoring School Nutrition Programs (SNP) such as the National School Lunch Program (NSLP) and School Breakfast Program (SBP) in the RCCI facility include cash reimbursement for breakfasts, lunches and snacks planned according to nutritionally adequate meal patterns and served to eligible students, as well as the provision of USDA donated food assistance (commodities) through the Food Distribution Program (FDP).

Applicable Regulations

Regulations which are pertinent to the operations of the School Nutrition Programs in an RCCI are 7 CFR: Part 210, Part 220, Part 250, and Part 3015. All regulations are available on the School Nutrition page of our website: www.doe.in.gov/food.

7 CFR - Title 7 Code of Federal Regulations

7 CFR Part 210, National School Lunch Program (NSLP) - Sets forth the requirements for participation in the NSLP. It specifies program responsibilities of State and local officials in the area of program administration, preparation and service of nutritious lunches, payment of funds, use of program funds, program monitoring and reporting and recording requirements.

7 CFR Part 220, School Breakfast Program (SBP) - Sets policies and prescribes regulations necessary to carry out the provisions of Section 4 of the Child Nutrition Act of 1966, as amended, which authorizes payments to the states to assist them to initiate, maintain or expand nonprofit breakfast programs in schools and RCCIs.

7 CFR Part 250, Donation of Foods for Use in the United States - Sets forth the terms and conditions under which donated foods may be obtained from the USDA for use in the Child Nutrition Programs.

7 CFR Part 3015 - The uniform Federal assistance regulations published by the USDA to implement Office of Management and Budget circulars A-21, A-87, A-102, A-110, A-122 and A-128.

Common Acronyms used in the Child Nutrition Programs

ADA = Average Daily Attendance

ADP = Average Daily Participation

AR = Administrative Review

CFR = Code of Federal Regulations

CNP = Child Nutrition Programs (all nutrition programs funded via USDA)

CNPweb = Child Nutrition Programs online reporting system

DOE = Department of Education

FDP = Food Distribution Program

FNS = Food and Nutrition Service (USDA)

HHFKA = Healthy Hunger Free Kids Act

LEA = Local Education Agency

NSLP = National School Lunch Program

OvS = Offer versus Serve

RCCI = Residential Child Care Institution

SA = State Agency (DOE)

SBP = School Breakfast Program

S&CN = School and Community Nutrition (at DOE)

SFA = School Food Authority

SMP = Special Milk Program

SNP = School Nutrition Programs (Lunch, Breakfast, Snacks, Special Milk)

USDA = United States Department of Agriculture

GENERAL PROGRAM REQUIREMENTS

Qualifications of the Institution

RCCIs can receive full benefits of School Nutrition Programs provided that the institution:

- 1) is public or nonprofit private;
- 2) operates principally for the care of children;
- 3) is residential;
- 4) if private, is "tax exempt" under Section 501(c)(3) of the Internal Revenue Code of 1954;
- 5) if private, is licensed by the State to provide residential child care.

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 for full benefits include, but are not limited to:

- homes for the mentally retarded, emotionally disturbed, physically handicapped or unmarried mothers and their infants;
- group homes;
- halfway houses;
- orphanages;
- temporary shelters for abused and/or runaway children;
- long-term care facilities for chronically ill children;
- juvenile detention centers.

NOTE: Boarding schools are **not** considered to be RCCIs.

States may not impose any additional eligibility requirements. Of course, as with schools currently participating, inability to comply with program regulations would disqualify an institution from participation.

Agreement with the State Agency (SA)

To become a sponsor of NSLP and SBP you must request an agreement from the SA. The first year can start at any time, but there is an annual renewal process after that effective every year on July 1. The agreement, which includes sponsor and site applications, a Policy Statement, and Civil Rights information sets forth the terms, conditions, and covenants necessary to comply with government regulations of the programs. When the RCCI administration is convinced that the responsibilities can be correctly executed, the agreement is signed by the RCCI Director and returned to the SA for consideration. It is signed at the state level, thus becoming the agreement or legal, binding contract. A copy of the signed agreement is returned to the RCCI. It is the responsibility of the RCCI administrative staff to oversee the programs to assure that they are carried out successfully within the framework of the contract. It is imperative that food service employees in administrative and supervisory capacities become familiar with this document and with the Policy Statement.

Policy Statements for Non Pricing Institutions

All RCCIs participating must have a policy statement. Pricing programs (where children pay for the meals) most often found in schools, require a lengthy policy statement as outlined in 7 CFR Part 245.10. Non pricing programs, such as found in most RCCIs, may have a simplified version of the required policy statement. To qualify as a non-pricing program, RCCIs may not charge children for any meals served.

Any policy statement for non-pricing programs must contain the following: that the entire enrollment is being served the same meal at no charge and without discrimination against any child in the course of the meal service. A suggested template will be sent to new sponsors to sign prior to approval. For renewing sponsors, it is found on the CNPweb in the Sponsor Summary Packet list.

Questions about Policy Statements

Q: In RCCIs with non-pricing situations, is the RCCI required to reduce tuition, board or other fees paid by the parents of children who qualify for free or reduced price benefits by the amount of the benefits they would have received in a pricing situation?

A: No, RCCIs operating non pricing SNPs are not permitted to administer such a price reduction.

Q: What are the requirements for submitting a policy statement for RCCIs with students who attend an RCCI during the day, but do not reside in the institution?

A: RCCIs with day students in attendance must submit the Pricing policy statement.

Food Safety

The National School Lunch Act requires that two food safety inspections per school year be conducted by the State or local governmental agency responsible for inspections. All sponsors of National School Lunch Programs should request these from their local county health department and keep documentation of the request. If a health inspection is requested and completed, the latest health inspection should be posted in a public place. Also, all RCCIs are required to create and implement a food safety plan. More details on these requirements are on our website <http://www.doe.in.gov/nutrition/food-safety>.

Wellness Policy

All RCCIs are required to create and implement a Wellness Policy. A Wellness Policy is a set of goals for nutrition education, physical activity, campus food provision, and other school-based activities designed to promote student wellness. For more information, see our website <http://www.doe.in.gov/nutrition/scn-wellness-policy-resources>.

Civil Rights

Any materials disseminated by an RCCI regarding the School Meal Programs such as the free and reduced price meal application for Day Students, must include the following statement:

The U.S. Department of Agriculture prohibits discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

If you wish to file a Civil Rights program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](http://www.ascr.usda.gov/complaint_filing_cust.html), found online at http://www.ascr.usda.gov/complaint_filing_cust.html, or at any USDA office, or call (866) 632-9992 to request the form. You may also write a letter containing all of the information requested in the form. Send your completed complaint form or letter to us by mail at U.S. Department of Agriculture, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, by fax (202) 690-7442 or email at program.intake@usda.gov.

Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

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Children should not be required to use a separate dining area, go through a separate serving line, enter the dining area through a separate entrance or consume their meals at a separate time based on their race, sex, color, national origin, age, or disability.

RCCIs must also have on file data on the racial/ethnic makeup of the children applying and participating in the School Meal Programs. The method of collecting data can be developed by the RCCI. Methods include observation, personal knowledge or voluntary self-identification by the applicant.

The “...And Justice for All” nondiscrimination poster must be displayed prominently where participating children can see it. The poster can be obtained by contacting our office.

RCCIs must also have a written compliant procedure, complaint log, and complaint form. For templates, visit our website located below.

Annually at least one person at the sponsor level must take the online Civil Rights Training and in turn provide the training to the food service employees. See our website for access to the training site:
<http://www.doe.in.gov/nutrition/scn-civil-rights-requirements>.

Common Questions about Civil Rights

Q. Is it necessary for an RCCI to be accessible to children with disabilities?

A. Regulations state that all Child Nutrition Programs must be accessible to children with disabilities. However, structural alterations are not required for participation in any Child Nutrition Program. Therefore, an RCCI need not make structural alterations to its facilities to accommodate an individual. The RCCI should work toward making its facilities accessible to all and, until that time, refer children to facilities that are properly equipped.

Q. How do I handle a civil rights complaint?

A. A civil rights complaint form is available on the Department of Education website:
<http://www.doe.in.gov/nutrition/scn-civil-rights-requirements>.

Calendar of Due Dates

For all sponsors on any of the School Nutrition Programs, there are several items to be completed during each year. See Appendix A for the list of due dates for those things most applicable to RCCIs.

CHILDREN'S FREE AND REDUCED PRICE ELIGIBILITY

Once an RCCI has been approved to operate the NSLP/SBP, 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 NSLP and SBP.

The eligibility requirements of residential students are determined differently for those who are day students.

Institutionalized Children

An institutionalized child is considered 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 income to the child. Only the income a child earns from employment and/or personally receives while in residence at the institution is considered income.** As a result, meals for most institutionalized children can be claimed as free because the children's personal income falls well within the free eligibility guidelines.

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

A. The Statement of Facts - The simplest method of documenting children's eligibility is to have a signed Statement of Facts on file at the RCCI. This is a written statement outlining the general policy or condition within the RCCI which would cause all its institutionalized children (not including day students) to be eligible for free benefits. A prototype form is included in Appendix B. The following are some acceptable examples of what would qualify as Statement of Facts:

Example 1: "All our children are wards of the court. They are not permitted to earn, receive or retain any money while in our custody."

Example 2: "Our students are permitted to hold part-time jobs (up to 16 hours per week). The maximum earnings we have seen have been \$83.00 per week. We also permit students to get up to \$5.00 per week from home, but require any money received or earned to be turned in to our 'bank' and to be drawn out only with permission."

B. Eligibility Roster - If an RCCI does not have a predetermined policy which dictates the allowable income to children, then it may wish to record eligibility determinations, by child, on a list. A sample eligibility roster is included in Appendix C. It must contain the following information:

- child's name;
- date of eligibility determination;
- category of eligibility; and
- approving official's signature/initials.

Day Students Attending RCCI

Day students are children who attend, but do not reside in an RCCI. A student's eligibility for free, reduced or paid meal benefits is determined based on the student's household size and income or Food Stamp/TANF participation. A Statement of Facts does **not** cover the eligibility of day students as it does for the institutionalized children.

To determine a day student's eligibility, RCCIs must obtain documentation of his/her free and reduced status from the regular school of attendance or have the child's family apply with your facility. In some situations, day students may already be enrolled at a regular school and if eligible, should have an approved application on file there. RCCIs may request a copy of the approved free and reduced application from the school.

For other day students not transferring from a regular school, prototype free and reduced applications which contain all required language and instructions, as well as the required parent letter, can be obtained online at <http://www.doe.in.gov/nutrition/snp-free-and-reduced-price-forms>. Applications must be distributed to households at the beginning of each program year, normally July. The RCCI can mail the application home to all households or send the applications home with the day students. The RCCI must review applications, make eligibility determinations, complete Verification and other requirements in relation to processing applications by using the Eligibility Manual for School Meals found here: <http://www.doe.in.gov/sites/default/files/nutrition/2013-eligibility-manual.pdf>.

For Categorical Eligibility Based on Food Stamp and/or TANF information, the application must include:

- name of the child for whom application is made;
- food stamp or TANF case number for the child for whom application is made; and
- signature of an adult household member.

For Eligibility Based on Household Size and Income, the application must include:

- names of all household members;
- amount and source of income received in the prior month by each member;
- the last 4 digits of the social security number of the adult household member who signs the application or an indication that the household member does not have one; and
- signature of an adult household member.

Day students from households currently certified to receive Food Stamp/TANF assistance are categorically eligible for free benefits. If a household does not receive such benefits, then reported income must fall within Federal eligibility guidelines to entitle a child to free or reduced price meal benefits.

Along with free and reduced applications of day students, RCCIs with day students should also keep an eligibility roster. As mentioned in the previous section, an eligibility roster records the names of all children in the RCCI along with the appropriate eligibility information. Please note that although one Eligibility Roster can be used for both institutionalized children and day students, the eligibility and documentation requirements differ between the two groups. Care should be taken to ensure that the eligibility requirements are met for both institutionalized children and day students. The Eligibility Roster does not determine the eligibility of students, but records the eligibility of students for free and reduced price benefits.

Verification

Unless an RCCI approves and processes free and reduced applications for day students, RCCIs are exempt from verification efforts. Please check with your SA for specific verification requirements and procedures.

Questions about Eligibility

Q: Are residential institutions which operate only on weekends eligible for participation in the SNPs?

A: No. It is the intent of the law that a residential institution provide continuous child care service. Since an institution operating only on weekends is not open continuously, it is not eligible to participate.

Q: When an institution maintains only a portion of its membership in residence and another group of children attend daily but reside elsewhere, is it eligible to participate in the SNPs?

A: Yes, the primary basis for eligibility of an institution to participate is its residential status. As long as some children reside in the institution, it is considered residential and eligible to participate. However, any children **under** age 21 who participate in the institution's program may receive full program benefits in the SNPs regardless of whether they reside at the institution. However, each eligibility status must be determined individually based on the criteria described above.

Q: When adults are also in residence in the institution, must children reside in a physically separate unit or wing within the institution?

A: It is the intent of the regulations to serve children who reside in an institution which is designed and operated primarily for the care of children or in a separate children's wing or in an identifiable area of an institution. As such, even though an institution primarily serves and cares for adults, the regulations have been written to allow these types of institutions to participate if the residing children are located in a distinct part of the institution designed primarily for the care of children.

Q: Are RCCIs, such as, runaway shelters that have temporary clientele, eligible for participation in SNPs?

A: As long as the institution itself operates on a continuous basis, it can participate in SNPs. Due to the short-term services these types of institutions provide, it is of the utmost importance that complete records be maintained for three years to document claims. Such records should clearly illustrate in sufficient detail, by type of meal (breakfast or lunch), that all meals served on any given day and claimed for reimbursement were eligible for such reimbursement. Careful records of entrance and exit dates of each resident and their eligibility category during their stay must be kept.

Q: Are homeless shelters that house both adults and children and do not physically segregate the children from the adults eligible to participate in the SNPs?

A: No, homeless shelters which cannot demonstrate a primary mission of service to children or which permit families to reside together are not eligible to participate as RCCIs. However, children are eligible to participate in the Special Milk Program (SMP) as "settlement houses" and claim milk served to children. Contact your SA for details.

Q: If a child, who resides in an RCCI, attends a traditional school during the day, how is an eligibility determination made for the child at the day school?

A: To apply for free and reduced price benefits at the day school, the RCCI must submit to the day school an application on behalf of the child. A complete application for an institutionalized child must include:

- a) the child's name;
- b) the child's personal income (money earned or received in hand) and how often it is received;
- c) signature of an adult from the RCCI.

The day school would then review the application based on the household size and income reported. A list of residents provided to the school by the RCCI is not sufficient.

Q: When a correctional facility serves as an RCCI, what is the definition of separate areas for inmates under twenty-one?

A: If inmates who are eligible for the CNPs reside on one side of a corridor with non-eligible inmates on the opposite side, the distinct or separate wing or identifiable area requirement is satisfied. If there is an "under twenty-one" corridor or wing, then the requirement is satisfied.

MENU PLANNING

Meals served in the NSLP should always be appealing, nutritious, well-balanced and designed so that, over a period of time, they will provide children with approximately one-third of the nutrients they need according to the Recommended Dietary Allowances. They should also conform to the USDA Dietary Guidelines for Americans – see Appendix D.

We have also included in Appendix E, F, and G, the Menu Plans and meal requirements for **School Lunch**, **School Breakfast**, and the **Afterschool Snack Program**. These charts list the food components and the minimum quantities required, by age/grade groups, for complete, reimbursable meals. As of July 1st, 2012, all schools and RCCIs are required to operate the same food-based meal pattern under the Healthy Hunger Free Kids Act (HHFKA).

Meal Requirements: National School Lunch Program

For the Lunch Program, there are special requirements concerning the minimum daily and weekly amounts of various food groups (components). RCCIs will follow their own specific meal pattern chart because the number of operating days per week is 7, as opposed to 5 days for schools.

A complete lunch consists of five different food components in required serving sizes. See Appendix E for specific details on the required serving sizes for the examples below:

- Meat/Meat Alternate
- Vegetable
- Fruit
- Grains/Bread
- Fluid Milk

Sample Lunch Menu	Food Item	Food Component
Turkey Sandwich	Turkey Whole Wheat Bread	Meat/Meat Alternate Grain
Tossed Salad	Lettuce, Tomatoes and Carrots	Vegetable
Banana	Banana	Fruit
Milk	Milk	Milk

Meal Requirements: School Breakfast Program

A complete breakfast consists of four food items from the three food components:

- Grains (can add Meat/Meat Alternative and count as Grain)
- Fruit (can also serve Vegetable and count as Fruit)
- Milk

Sample Breakfast Menu	Food Item	Food Component
Sausage Biscuit Sandwich	Sausage Biscuit	Grain (Meat/Meat Alternate counting as a Grain) Grain
Apple Juice	Apple Juice	Fruit
Milk	Milk	Milk

Offer versus Serve (OvS)

Offer versus Serve (OvS) regulations were introduced in 1975 to reduce the amount of plate waste in the NSLP. OvS allows children to choose a specified minimum number of food items for breakfast and food components for lunch from those offered. These regulations mandate that the OvS provision be implemented in institutions serving students of a high school grade level as defined by the State. However, this provision is optional in RCCIs for any grade level because it may be difficult to administer OvS to institutionalized children, particularly when there are special circumstances such as special diet or security concerns.

Nevertheless, in certain institutions where it is desirable, officials may wish to offer this option. In RCCIs implementing OvS in their lunch program, children **must be offered all five components**. All children must choose at least full portions of **three** of the five components offered. The Healthy Hunger Free Kids Act of 2010 further requires each reimbursable meal to include a minimum of ½ cup of fruit, vegetable or combination of the two.

RCCIs which have OvS in their breakfast programs must offer all **four** food items to all children. Children then have the option to choose at least **three** of the four items offered. Please note the difference between breakfast and lunch with OvS. Breakfast focuses on food items, while lunch focuses on food components. Sample OvS menus have been included in Appendix H.

If properly implemented, OvS should reduce food waste, since children would not be forced to accept food they do not wish to eat. The reduction of food waste may not be achieved, however, unless managers take care to avoid overproduction. To ensure proper planning for OvS, managers will need to keep accurate daily records of food production for each menu item.

Family Style Meals

If your facility serves family style meals, food items must be placed on the table in sufficient quantities to provide at least the minimum portions of the components for all the children at the table and to accommodate any adults supervising the meal service who are eating with the children.

The required amount of each food item must be served to each child. When the full portion has not been served to a child initially, supervising adults must assume the responsibility of actively encouraging the child to accept service of the full portion during the course of the meal.

If an RCCI has both a family style meal service and is implementing OvS, once a child has taken at least the minimum portions of the required food items, then he/she may also take less than the minimum quantity of other food items.

Food Production Records

Food production records are required to be completed and retained for every meal served and claimed under the NSLP and SBP. Production records provide documentation that meals claimed for reimbursement meet the quantity and component requirements. The SA does not require a specific form, but the form should contain all the same information as the suggested sample in Appendix I. The food production records should show the quantities of food prepared (in cans, lbs, servings, etc.) and left over each time reimbursable meals are served. The record should also include a space for other pertinent information about the day's production, such as overproduction due to circumstances beyond the manager's control, and comments on acceptance of each menu item. These records then become a valuable planning tool, since you can use them to help estimate the amount of each menu item to prepare the next time it is served.

Varying Portion Sizes

Determining Portion Sizes – RCCIs must serve quantities of foods based on their residents' nutritional needs, which vary with age. Review the ages of your residents and refer to the Meal Pattern Requirements chart in Appendix E, F, or G for guidance. If the RCCI is restricted to serving the same quantities to all children, the minimum portion size must be that required for the highest age group and a meal pattern exemption to serve the same serving sizes to all age groups must be approved by the state agency. Note that the ages of some children may not necessarily correspond to the grades outlined in our charts.

Meal Requirements: Afterschool Snack Program

To be eligible for this program, the RCCI must offer education or enrichment activities in an organized, structured and supervised environment AFTER school. It must be stressed that this would be available to ALL resident children of the RCCI.

The snack meals may only be claimed on days when the child went to school whether on-site or at another regular school. RCCIs are not allowed to claim after school snacks when school is not in session, including weekends and holidays. This is different than lunch and breakfast, which may be claimed on all days of participation. There must also be a way to determine that children are present on a given day, such as having a roster or sign-in sheet for the snack program.

See Appendix G for the snack meal requirements. Production records are required to provide documentation of meal pattern compliance. It is also required that the RCCI review the after-school care program two times a year to insure compliance. See our website for more information: <http://www.doe.in.gov/nutrition/after-school-snack-program>

Questions about Menu Planning

Q: Can food substitutions made for medical, dietary or religious reasons?

A: If the child has a disability, then substitutions may be made as long as a doctor or other recognized medical authority has provided a physician's statement providing acceptable alternatives. Certain alterations for medical or dietary reasons that are not disabilities may be made as long as the substitutions still meet the meal pattern requirements. Alterations may also be made for religious reasons, if nutritionally sound and approved by the USDA's Food & Nutrition Service. A statement for each child should be on file explaining who made the request and how it was determined that granting the special meal pattern was in the child's best interest. If substitutions are for the RCCI as a whole, only one statement is necessary.

Q: Can RCCIs serve pitchers of milk placed on tables in the eating area (beyond the serving line) and be in compliance with the meal requirements?

A: RCCIs may choose to have pitchers of milk on the table and allow children to serve themselves; however, they must take extreme caution to ensure all meals are reimbursable. Glasses of sufficient size to meet the quantity requirement should be provided. For example, a 10 oz. glass must be used to ensure that the minimum requirement of 8 oz. is met.

Q: Can RCCI's claim meals for days when the meals are provided by parents or otherwise donated by the community?

A: Unless the RCCI has full documentation of the meal, including production records, recipes, etc., showing that the meal has met the meal pattern requirements, they should not claim a meal for reimbursement.

FOOD DISTRIBUTION PROGRAM

Eligibility for USDA Foods

Each year, recipient agencies must first be approved to participate in the National School Lunch Program (NSLP) before they are eligible to participate in the Food Distribution Program. New, recipient agencies are not eligible for USDA Foods until they have participated in the National School Lunch Program (NSLP) for one school year; however they will be eligible to complete a pre-order Survey. Those Recipient Agencies who receive “vended” or catered meals are not eligible to receive USDA Commodity Foods.

USDA Foods are purchased by the government to improve the nutritional status of children and offered to RCCIs based on their NSLP participation.

The annual USDA Planned Assistance Level (PAL), often referred to as Entitlement, is distributed to recipient agencies through the CNPweb system to all eligible sponsors each year on an annual pre-order survey. A recipient agency’s Entitlement balance is based on a RA’s Total Reimbursable Lunches claimed under the NSLP for the previous two school years. Each January, sponsors will be asked to complete an online, pre-order survey and spend their Entitlement by requesting the types and amounts of USDA commodities they wish to receive beginning the following September.

Delivery of USDA Foods

Frequency of Deliveries - Each August, the State contracted warehouse(s) will, upload available bi-weekly, delivery periods into the CNPweb system. Commodity Delivery Order requests must be completed through the CNPweb system.

Established commodity Delivery Orders to recipient agencies shall be made on a biweekly basis or with the mutual agreement of both parties at other intervals. Those recipient agencies affected by any deviation from the published schedule shall be notified by telephone as soon as the deviation is recognized by any agent of the contractor (i.e., delivery personnel). Biweekly delivery means every other week and **not** twice a month; therefore, recipient agencies may have deliveries scheduled three times in certain months.

Delivery Times - Deliveries shall be made between the hours of **7:00 a.m. and 3:00 p.m. (Recipient Agency Local Time)**, unless special arrangements are made in advance. Deliveries shall be made Monday through Friday, except holidays or other times when recipient agencies are closed for incidents such as inclement weather.

The contractor shall, **where practical**, provide each recipient agency with delivery on the same weekday of each scheduled delivery period or provide a 24-hour notification of delivery. This provision should actually increase delivery efficiency by enabling recipient agencies to plan and schedule receiving personnel.

In the event that deliveries are delayed due to a cause beyond the control of the recipient agency (i.e., inclement weather, contractor equipment failure, or personnel problems), the contractor shall work with the affected recipient agency to arrange another agreeable time of delivery before the next scheduled delivery date. When requested, the contractor must provide delivery to all recipient agencies. The contractor shall make every effort to ensure that deliveries are completed as scheduled on a biweekly delivery basis. Qualified, Non-school Summer Food Service Program Sponsors will have their orders placed for them by the State Agency through the CNPweb™ system.

Delivery Drops - Drivers and/or other representatives of the state contracted warehouse shall deliver USDA Foods into designated receiving areas at each recipient agency site and shall not be required to stock such USDA Foods on sponsor shelves.

Single Inventory Record Keeping System

Indiana, like many other states, has adopted the single inventory approach to receiving, storage and utilization of USDA Foods. Once a USDA Food item appears in a sponsor's CNPweb™ inventory, it is considered to be commercial product regarding delivery, receiving, storage and utilization. The single inventory recordkeeping system combines purchased food and USDA Foods purchased for the School Nutrition Programs into one system. USDA's decision to purchase and distribute USDA Foods in commercial labels rather than USDA labels created a need to change inventory procedures. Since USDA Foods would be visually indistinguishable from purchased food, maintaining separate inventories for the two classes in order to facilitate compliance with existing regulations would be difficult. Therefore, USDA granted states a waiver from certain regulatory requirements. States that adopted the single inventory system, and SFAs under their oversight, were instructed to apply the same recordkeeping and inventory requirements to USDA Foods that they use to safeguard foods purchased with School Nutrition Program funds.

Handling USDA Foods under the Single Inventory Record Keeping System -

1. The value of the USDA Food will be realized when title passes to the recipient agency. At that point, the product becomes the property of the recipient agency and is a nonprofit food service account asset.
2. Since separate inventories are no longer required, the same inventory valuation method currently used by the recipient agency for purchased products would now apply to all USDA Foods. For example, if the recipient agency uses FIFO (first in-first out) for purchased products, the recipient agency would use FIFO for its USDA Foods.
3. The recipient agency will treat and safeguard its USDA Foods just as it now does with supplies purchased with nonprofit food service account funds. As always, good inventory management and control practices must be maintained.
4. The recipient agency may use the USDA Foods across programs as long as all income accrues to the nonprofit food service account in the same manner income currently accrues from the use of supplies purchased with nonprofit food service account funds.
5. When a loss of a USDA Food occurs after title has transferred, the recipient agency is required to use the same procedures currently in place for reporting purchased product losses. If the recipient agency is not obligated to report purchased product losses to the State agency, the recipient agency will no longer be responsible for reporting USDA Food losses. However, the recipient agency remains responsible for ensuring that all nonprofit food service resources are safeguarded and reminded that any misuse of nonprofit food service resources is subject to criminal prosecution under section 12(g) of the National School Lunch Act.
6. USDA Food entitlement credit will be available to recipient agencies that furnish food for nationally declared disaster feeding. The credit cannot exceed the lesser of the actual USDA Foods supplied or the amount of the USDA Foods received during the past 12 months.
7. Once received by the recipient agency, the State agency will not be involved in arranging or accounting for transfers to other agencies. Transferring of USDA Foods may still occur; however, arrangements will be made at a local level. Since the value of the USDA Food has already been realized by the recipient agency, no additional

entitlement will be credited. It will be the responsibility of each recipient agency to recover the transferred product value.

8. Food safety recalls will follow the current USDA Hold and Recall procedures. As with any commercial product, can codes and establishment numbers will be used.

9. Since not required on commercial labels, the pack date will be lost. As you know, this information was the basis for "Best if Used by Dates" guidance. The "Best if Used by Dates" guidance commodity chart can be found on the Food Distribution Resource Page at <http://www.doe.in.gov/nutrition/food-distribution-program>. All recipient agencies are reminded to maintain good inventory practices.

Receiving

Designated receiving areas have the following parameters:

1. Delivering carriers shall have access to a ground level unloading area or standard truck dock.
2. Facilities shall be accessible by truck.
3. Final receiving areas shall be on the same level as the unloading area and no more than fifty feet from ground level unloading area or truck dock.
4. Carriers will follow standard industry practice pertaining to deliveries when addressing unusual delivery situations. A recipient agency representative shall verify accuracy of items, quantities, and condition of USDA Foods. The recipient agency representative must sign each delivery receipt. The receiving agent shall note variances from the norm, such as shortages, damages, etc., on the appropriate delivery receipt. Delivery personnel shall initial all such notations.
5. A recipient agency delivery order of fewer than ten cases per drop site will be assessed a drop fee not to exceed fifteen dollars per drop. A drop fee **may not** be assessed when delivery of less than the minimum is the result of the contractor's discretion. As an example, if a single recipient agency requested a combined delivery of dry and cooler/freezer USDA Foods which met the minimum delivery requirement and the contractor decided to deliver less than the minimum of dry USDA Foods on one day and less than the minimum of cooler/freezer USDA Foods several days later, the recipient agency would not be subject to the drop fee.

Damages and Shortages

The sponsor should approach these issues for USDA Foods just as they would for any commercially purchased product. Under the single inventory system, your first contact would be the distributor. Be sure that all such incidents are noted on the delivery document and initialed by the delivery agent. The distributor will post a USDA Food short delivery in the CNPweb™ system and the sponsor will need to reorder the product.

USDA Food Complaints

When a sponsor can clearly identify that there is a problem with a USDA Food product they may contact the State Agency to determine if a formal complaint to the USDA is warranted. You can contact the State Agency by calling John Moreland, Food Distribution Program Specialist at (317) 232-0548 or jmorelan@doe.in.gov or Linda Smith, Food Distribution Program Specialist at (317) 232-0859 or lsmith@doe.in.gov.

PROCUREMENT

The requirements as set forth in USDA regulations for each program are similar in scope. The parameters of all programs revolve around 7 CFR Parts 3016 & 3019. The program regulations that outline the basic requirements for procurement are: 7 CFR Part 210.16(b) & (c); 7 CFR Part 210.21. Part 210.21 will refer you to 3015; however, you will use 3016 (for public sponsors) or 3019 (for private-not-for-profit sponsors).

These standards do not relieve the grantee of any contractual responsibilities under its contracts. Grantees shall use their own procurement procedures which reflect State and local laws as they conform to USDA regulations (ref. 3016 or 3019).

- "Grantees shall maintain a written code or standards of conduct which shall govern the performance of their officers, employees, or agents engaged in the award and administration of contracts supported by federal funds."

No one affiliated with the grantee (i.e. employee, officer, or agent) can take part in the selection or award of a contract supported by federal funds. **(A potential contractor cannot prepare and/or develop any procurement or contract documents. Part 3016.36(b)(3)(1-5) & 3019.42).**

- "The grantee shall establish procurement procedures which provide that proposed procurement shall be reviewed by grantee officials to avoid the purchase of unnecessary or duplicate items". (3016.36(b)(4))

Part 3016 stresses anticompetitive practices as implemented in Public Law 105-336. A potential contractor may provide specific information. However, a potential contractor cannot prepare procurement or contract documents (specifications, invitation to bid, statement of work, RFP, etc.) (3016.60(b)).

The grantee shall in its evaluation consider alternatives to ensure an economical purchase is made. Alternatives are, but not limited to; 1) breakout of different items so as not to limit competition; 2) or consolidate to achieve a more equitable price and /or fee; 3) and consider lease instead of purchase.

- "All procurement transactions regardless of whether by sealed bids or by negotiations, and without regard to dollar value, shall be conducted in a manner that provides maximum open and fair competition consistent with regulations. Procurement procedures shall not restrict or eliminate competition."

Awarding of a contract should only go to the contractor who can successfully carryout the terms and conditions of the proposal. Consideration should be given to integrity, past performance, and financial stability.

a) **Small purchases** - Simple and informal for procurement of services, and supplies whose cost in aggregate is less than \$150,000. If this procedure is used: "Price or rate quotations shall be obtained from an adequate number of qualified sources." Grantee shall comply with State and local small purchase limits under \$150,000.

b) **Competitive sealed bids** - Procurement of service, and/or supplies whose cost in aggregate is more than \$150,000, where formal advertising is used to solicit potential vendors: "Sealed bids are publicly solicited and a firm fixed price contract is awarded to the responsible bidder whose bid, conforming with all the material items and conditions of the invitation for bid, is the lowest in price." Under formal advertising the following requirements are a must.

- 1) A complete specification or purchase description is available from the grantor.
- 2) Bid proposals shall be solicited from an adequate number of suppliers willing and able to compete. This

is done by making sure you advertise in as many media outlets available.

3) A sufficient time frame shall be established between the first day of advertising and the date bids are actually opened (at least 14 days, 21 days when soliciting Food Service Management Companies).

4) Bid proposals shall be opened publicly at a pre-designated place and time.

5) The award of the firm fixed price contract shall be made known to the successful bidder by written notice (3016.36(d)(2), 3019.44).

NOTE: Any information requested under “Evaluation Criteria” will be used only to establish that a bidder is responsive and responsible. (Example: financial statements, nutritional data-for end products, etc.)

c) **Noncompetitive negotiation** - Procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources where competition is determined to be inadequate, should be a last resort when all other methods are not feasible. Conditions for which other methods are infeasible are limited to the following:

- 1) The item or service is available from only one source.
- 2) An emergency situation exists that will not permit competitive solicitation.
- 3) Authorization from the state grantor agency. (3016.36(d)(4))

USDA Regulations and Other Resources:

- **7 CFR 210: (210.16 and 210.21)** <http://www.ecfr.gov/cgi-bin/text-idx?SID=3398a51348b3f4d2ace0dcfcdf474bb&node=7:4.1.1.1.1&rgn=div5>
- **7 CFR 250: (250.12 and 250.30)** <http://www.ecfr.gov/cgi-bin/text-idx?SID=3398a51348b3f4d2ace0dcfcdf474bb&node=7:4.1.1.2.14&rgn=div5>
- **7 CFR 3016: (Public Schools)** <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=fdb2ef881af44d1966c998077badd57f&h=Lf=t07.sgm&r=PART&n=7y15.1.8.2.4&ty=HTML>
- **7 CFR 3019: (Non-Public Schools)** <http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=fdb2ef881af44d1966c998077badd57f&h=Lf=t07.sgm&r=PART&n=7y15.1.8.2.6&ty=HTML>
- **USDA - Commodity Processing:** <http://www.fns.usda.gov/fdd/processing/> and <http://www.commodityfoods.usda.gov/processing.htm>
- **IDOE/SCNP:** <http://www.doe.in.gov/nutrition/scn-procurement>
- **ACDA:** <http://www.commodityfoods.org/>
- **National Food Service Management Institute:** First Choice – A Purchasing Systems Manual for School Food Service 2nd Edition: (This document may be downloaded by chapter from the National Food Service Management Institutes website.) <http://nfsmi-web01.nfsmi.olemiss.edu/DocumentSearch.aspx> You will need to type “First Choice” in the “Title” box and then search.

FINANCIAL MANAGEMENT

Recordkeeping

There are financial recordkeeping requirements for the NSLP and SBP. Sponsors should either establish a separate account for the nonprofit food service or maintain a separate line item fund in order to track expenditures and revenue related to child nutrition programs. This information must be available for review by the state agency at any time. It is required that RCCIs complete a food service Annual Financial Report in our online CNPweb system. This form is available at the end of claims list each year and must be completed by September 1st. Instructions for its completion are in Resources on the CNPweb.

Records should demonstrate compliance with program requirements and should include revenue and expenditure records sufficient to establish the nonprofit status of the food service operations. All records, including supporting documents such as bills and invoices, must be retained for a minimum of three years after the end of each program year, June-July.

RCCIs may use a bookkeeping system of their choice. The following section specifies the types of financial records that must be retained. Not every RCCI will have all types of assets and expenses.

Cash and Cash-Like Records	Examples of Minimum Records
Savings and/or checking account	Bank statements
Cash-on-hand	Cash count record and petty cash account
Cash due the program	Federal Reimbursement due, charged lunches, discounts earned
Negotiable securities	Market value of T-bills, bonds and stocks owned by the nonprofit foodservice
Cash payable (a debit item)	A bill that is on hand to cover a legitimate nonprofit foodservice expense

Expenses	Examples of Minimum Records
Net purchases*	Food purchases, less discounts and returns
Commodity charges	State processing, handling and delivery charges
Labor	Payroll records, including employee/employer contributions to FICA, etc.
Other Expenses	The nonprofit food service may pay these costs. Supporting bills must be retained. Examples are trash, utilities, insurance, paper, cleaning supplies, repairs, equipment, and depreciation.**

***Food Costs:** At the end of any program year, the nonprofit food service will need to know an average food cost per meal in order to allocate expenses on the AFR appropriately. The AFR instructions in the CNPweb system give complete guidance on this process. For a quicker idea of your meal cost, there is a sample on how to cost a meal in Appendix M.

****Depreciation of Equipment:** This is defined as depreciation of nonexpendable food service equipment costing more than \$300 and having a useful life of more than one year. If equipment is depreciated, it should be depreciated over a twelve year period. Equipment costing under \$300 per unit may be expensed when purchased.

The following **non-financial** records must also be kept:

1. **Meal Counts** - RCCIs must keep a record of each site's daily meal count by meal and by category to support its Claim for Reimbursement.
2. **Free and Reduced Price Meal Data** - RCCIs must maintain an accurate record of the number of children eligible for free and reduced price meals (applications of day students), including any source documentation. This can be accomplished by maintaining your eligibility roster and any free and reduced price application files. Active applications should be divided into free and reduced categories, and should indicate the dates of any eligibility changes for children who have withdrawn from the site, or had a change in income or family size.
3. **Production Records and Menus** - Menus and production records must be maintained to demonstrate that the required number of food components and food items are offered on any given day. Production records should include sufficient information to evaluate the menu's contribution to the meal pattern.

Specific Prohibitions

1. Meals for both program and non-program adults may **not** be claimed for reimbursement. However, food service revenues may be used to pay for, or subsidize, meals for program adults.* Non-program adults, however, are not to be supported by food service revenue. If you wish to charge non-program adults less than it costs to produce the meal, revenue must be transferred to the food service account from another source.

*Note: A program adult is an individual whose job description includes some on-site responsibility for food service, i.e. SBP and NSLP. A non-program adult is an individual whose responsibilities do not include food service programs.

2. Revenues may not be used to purchase land or buildings or to construct buildings.

3. The RCCI must limit its net cash resources to an amount that does not exceed three months' average expenditures for its nonprofit food service or such other amount as may be approved by the SA in accordance with 7 CFR Part 210.19(a).

Reimbursement

Reimbursement rates are adjusted annually in mid-July and vary for each program (NSLP & SBP). For the NSLP and SBP, there are three reimbursement rates: free, reduced priced and paid. The rates are posted on the School Nutrition page of our regular website: www.doe.in.gov/food.

Non-pricing programs are those programs which do not charge children for meals. If your RCCI operates a pricing program, where children eligible for the reduced price and paid meal rate are required to pay for their meals, you should contact the SA for further instruction.

RCCIs are eligible for an additional 2 cents per lunch reimbursement if 60% or more of lunches in the second preceding year were served to children eligible for free and/or reduced price meals. This will be noted in the Sponsor Information Sheet in the year the RCCI becomes eligible.

The Severe Need Breakfast rates allow qualified sites to receive additional per breakfast reimbursement. Sites are designated in the Site Sheet Breakfast Program section as "severe need" if 40% or more of its lunches from the second preceding school year were served to children eligible for free or reduced price meals. This must be met on a site-by-site basis and is automatically figured from the online claims. If the same sponsor is operating more than one RCCI, eligibility is determined for each RCCI site separately.

Question about Reimbursement

Q. How does an RCCI qualify for Severe Need Rates when it was not participating in the NSLP two years ago?

A. RCCIs that were not in the NSLP during the second preceding school year are not eligible for Severe Need Rates. After the RCCI has participated in the NSLP for the two year period and has necessary participation data, it would then be eligible to qualify for the higher reimbursement rate. This will be automatically determined in the CNPweb system each year.

MEAL COUNTING AND CLAIMING SYSTEMS

In order to obtain federal reimbursement for meals served, trained adults must accurately count, record and claim the number of meals actually served to eligible participants.

RCCIs must have a Policy Statement approved by the SA before any meal count system is implemented. (Please refer to the Policy Statement section for specific requirements.) Also, all food service personnel must be adequately trained before starting any child nutrition program. There is an example of a meal count policy in Appendix O.

The essential components of a good counting and claiming system are the point of service meal count and the recording and reporting procedures.

Any system in place must provide a "point of service" meal count:

- of reimbursable meals served;
- by type (free, reduced price and paid);
- each day; and
- without overtly identifying students receiving meal benefits.

There are different ways to count meals served by category, but the most common tool used in RCCIs with day student is the check-off list.

Check-Off List

Check-off lists indicate the names of all eligible students, by category, and are used at the point of service to record the number of reimbursable meals served. Please see sample check-off list in Appendix K. As each child is served a meal, his/her name is checked off on the list. At the end of the service, check marks are added up, by category, to determine the daily meal count.

Check-off lists must be kept up-to-date and must accurately reflect the correct eligibility category of students. The names of children who have withdrawn from the institution should be marked off, and the date of withdrawal should be noted. Newly enrolled students must be added and the date noted. For RCCIs whose students are all institutionalized, point-of-service may be done as simply as an "X" or a hash mark on a sheet of paper for each child being served a first meal. The paper must include the date and the type of meal being counted and maintained as documentation of numbers claimed for that meal on that date.

If residents are served family style, the information may be completed at the table. Any other variation to point-of-service counting should be approved by the State Agency.

Weekend Reimbursement

RCCIs can continue to receive reimbursement under the SBP and NSLP on the weekends. Reimbursement is made on a "per day of operation" basis. Therefore, reimbursement may be claimed for eligible meals served any day that an institution is approved to provide its services. Unless the RCCI has full documentation of the meal, including production records, recipes, etc., showing that the meal has met the meal pattern requirements, they should not claim a meal for reimbursement.

RCCI Sack Lunches Sent to Schools

In order for RCCIs to claim sack lunches sent to school with the institutionalized students, it must ensure that the school is not already claiming lunch for those children. RCCIs may claim such sack lunches if there is evidence that children would not otherwise be served a nutritious lunch or would not be served at an appropriate time. If appropriate, Offer versus Serve (OvS) should be exercised at the time the meal is packed at the RCCI, and should be packed, stored, and served under strict sanitary conditions to avoid contamination. OvS requirements are discussed in the Menu Planning section of this manual.

Non-Reimbursable Meals

The following items are **not** reimbursable and must not be included in the meal counts reported on the Claim for Reimbursement.

- Evening meals like supper
- Meal supplements such as snacks UNLESS on the After School Snack Program
- Adult meals
- Second meals eaten by eligible children
- A la carte items
- Meals given to day students to take home
- Meals not meeting the meal pattern requirements, e.g. a tray with only soup for an ill child
- Meals served to children of house parents
- Pitch in meals provided by families or communities that do not meet the meal pattern

Quick Guide to Reimbursable Meal Periods

	Holidays	Weekends	Summer	Regular Week
Breakfast	Allowed to claim	Allowed to claim	Allowed to claim	Allowed to claim
Lunch	Allowed to claim	Allowed to claim	Allowed to claim	Allowed to claim
After School Snack	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.

Internal Controls

An RCCI must establish internal controls to identify potential problems in the meal count system and to ensure that an accurate Claim for Reimbursement has been made. Internal controls protect RCCIs from having erroneous claims and potential over claims. Edits and monitoring are the two required internal controls.

Edit Checks - Daily meal counts should be entered on an edit-check sheet which is a mandatory record for schools and RCCIs. The daily meal count sheet is included in Appendix L. The attendance factor for RCCI is considered to be 100 percent, because students reside in the facility and would not be "absent."

Monitoring - Every school year, each RCCI with more than one site/building must perform at least one On-Site Review of each site under its jurisdiction. The on-site review must take place prior to February 1 of each school year. Furthermore, if the review discloses problems with a site's meal counting or claiming procedures, the RCCI must: 1) ensure that the site corrects the problem; and 2) within 45 days of the review, conduct a follow-up on-site review to determine that the problem has been corrected. Please contact the SA for monitoring procedures and review forms.

Written Instruction - It is highly recommended that each site within an RCCI maintain written instructions for all personnel which detail the operation of the meal count system and the responsibilities and duties of each person involved. See Appendix O.

Reimbursement Claim

The Claim for Reimbursement and instructions are found in the online CNPweb system. The information used to complete this form will be obtained from the RCCI's point-of-service counting records, which have been consolidated on the daily meal count sheet. While only the Claim for Reimbursement is filed with the SA, it is required that all evidence be maintained on file to substantiate the data reported on the claim. This includes all participation records.

Submit the original Claim for Reimbursement as soon as possible after the month is over, but within 60 days after the end of the month for which the claim applies. It is important to remember that any claim submitted later than 60 days after the end of the claiming month will only be approved upon submitting a "one-time exception" explanation by letter or email. Sponsors get only one 'one-time exception' in a 3-year period.

Question about Meal Counting and Claiming Systems

Q: May RCCIs claim NSLP reimbursement for meals served at supper time or in the evening which meet the school lunch pattern, provided that reimbursement has not already been claimed for a prior lunch?

A: No. A lunch served under the NSLP is defined as a meal served to children around mid-day, specifically between the hours of ten and two o'clock. A meal served at a time which is traditionally considered the last meal of the day would not be in accordance with this requirement and would not be eligible for reimbursement.

Q: May RCCIs use the morning count for meal choices instead of counting when the children are picking up their meal?

A: No, children who were counted in the morning might not be eating when it is lunch time or there might be new children eating who were not counted earlier. Meals must be counted only when the child receives the reimbursable meal.

Q: How do RCCIs count children who do not receive meals at the normal point of service (for instance, the child is in a detention center and is not allowed to eat with the normal population)?

A: Every attempt should be made to keep track of the number of reimbursable meals provided as they are given to the children.

Technical Assistance

Each area of the state of Indiana has a School Nutrition Specialist assigned to assist sponsors in all aspects of program compliance. You can find the name of your field specialist by looking in the CNPweb on the Packet Tab. Your field specialist is available to assist you in menu planning, determining eligibility status, production records, as well as general program compliance. Sponsors are highly encouraged to get to know their field specialist and to use them as resource in your Child Nutrition Program planning.

State Agency Compliance Reviews

Administrative Review

USDA requires a SA to conduct one on-site review of each RCCI at least once during each 3-year review cycle. The Administrative Review may be conducted by either federal or state reviewers. Regardless of which agency conducts the review, the procedures and forms used will be the same. Reviews may be conducted more frequently at state agency discretion.

What is an Administrative Review?

The Administrative Review focuses on all federal compliance aspects of the RCCI foodservice operations. It will include a thorough review of all documents related to the meals claimed for reimbursement, eligibility status of participants, claim filing process, food inventory, expenditures, food safety requirement, menu planning, nutritional standards as well as a meal observation for each meal type claimed for reimbursement. Sponsors are expected to daily maintain all documentation required for federal compliance; therefore additional time to prepare for an Administrative Review should not be necessary.

The two critical performance standards (PS) of the Administrative Review are: PS1 - all free, reduced price and paid lunches claimed for reimbursement are served only to children eligible for those meals; and are counted, consolidated and reported through a system which consistently yields correct claims; and PS2 - lunches claimed for reimbursement contain all food items/components in appropriate serving sizes including vegetable subgroups, as required by program regulations.

The Administrative Review will cover the following sections:

Section 1: Access and Reimbursement

- Applications
- Direct Certification
- Verification
- Benefit Issuance
- Meal Counting, Claiming and Reimbursement

Section 2: Nutritional Quality/Meal Pattern

- Dietary Specifications and Nutrient Analysis
- Multiple Meal Service Lines
- Offer versus Serve

Section 3: Resource Management

- Nonprofit School Food Service Account
- Paid Lunch Equity
- Revenue from Nonprogram Foods
- Indirect Costs
- USDA Foods

Section 4: General Program Compliance

- Civil Rights
- SFA On-Site Monitoring
- Local Wellness Policy
- Competitive Foods
- School Meal Environment Report Card
- Water
- Food Safety
- SBP & SFSP Outreach

Section 5: Other Federal Program Reviews

- Afterschool Care Snack Program
- Seamless Summer Option
- Fresh Fruit and Vegetable Program
- Special Milk Program

Additional information on the Administrative Review can be found on our website:

<http://www.doe.in.gov/nutrition/snp-administrative-review-information>.

Calendar of School Nutrition Program Requirements

Item or Process	Due Date	Submit to Doe	Retain in File
<u>CNPweb Packet for New Program Year</u> -Sponsor Information Sheet -Site Information Sheet -Other documents starred on packet page	June 1 st - School Start	Online/Starred Documents Sent to Office	No
<u>Food Service Management Company Contract/ Vended Meals Contract</u>	June 30 th	Signed Copy Sent to Office	Yes
*<u>Direct Certification- 1st Match</u>	2 nd Week of July-School Start	No	Yes
*<u>Parent Letter/Free and Reduced Application</u> -To all households not directly certified	After Direct Certification-School Start	No	Yes
<u>Food Distribution Program Re-Certification for New Program Year</u> -Green Puzzle Piece on CNPweb	August	Online	No
<u>Food Safety Letter sent to Local Health Department</u> -All sites must have 2 health inspections each year	School Start	No	Yes
<u>Breakfast Notification Letter</u> -Required for schools that serve breakfast	School Start and Multiple Times During School Year	No	Yes
<u>Civil Rights Training</u> -Completed quiz on Moodle website and print out -"And Justice for All Poster" in prominent place -Document training all staff involved in CNP	Annually	No	Yes
<u>Production Records</u>	Daily	No	Yes
<u>Claim for Reimbursement (CNPweb)</u>	Due within 60 days after the last day of the claim month	Online	No
<u>Annual Financial Report</u> -For previous program year	September 1 st	Online	No
*<u>Direct Certification- 2nd Match</u>	Last Week of September-Before Verification Process	No	Yes
* <u>Verification Process Started</u>	October 1 st	No	Yes
* <u>Direct Verification</u>	October 1 st	No	Yes
* <u>Verification Process Completed</u>	November 15 th	No	Yes
*<u>Verification Summary Report</u>	December 15 th	Online	No
*<u>Direct Certification- 3rd Match</u>	Last Week of January	No	Yes
**<u>On-Site Monitoring Process</u>	February 1 st	No	Yes
*<u>Update Paid Meal Pricing</u>	March	No	Yes

*Residential Child Care Institutions (RCCIs) do not need to complete these items if they do not approve free and reduced-price meal applications or charge for meals.

**Single school sites or single RCCI sites do not need to complete this item.

DOE/SCN October 2013

Statement of Facts
(Eligibility Documentation)
For

(Name of Institution)

Explain the **income policy** for the resident children of your institution. This constitutes documentation of their eligibility for free meals. Keep this document on file with your CNP contract.

For the Institution:

For the State Agency:

(Name & Title)

(Name & Title)

(Date)

(Date)

New Standards Will Improve the Health and Well Being of 32 Million Kids Nationwide

First Lady Michelle Obama and Agriculture Secretary Tom Vilsack today unveiled new [standards for school meals](#) that will result in healthier meals for kids across the nation. The new meal requirements will raise standards for the first time in more than fifteen years and improve the health and nutrition of nearly 32 million kids that participate in school meal programs every school day. The healthier meal requirements are a key component of the Healthy, Hunger-Free Kids Act, which was championed by the First Lady as part of her Let's Move! campaign and signed into law by President Obama. As parents, we try to prepare decent meals, limit how much junk food our kids eat, and ensure they have a reasonably balanced diet," said First Lady Michelle Obama. "And when we're putting in all that effort the last thing we want is for our hard work to be undone each day in the school cafeteria. When we send our kids to school, we expect that they won't be eating the kind of fatty, salty, sugary foods that we try to keep them from eating at home. We want the food they get at school to be the same kind of food we would serve at our own kitchen tables."

"Improving the quality of the school meals is a critical step in building a healthy future for our kids," said Vilsack. "When it comes to our children, we must do everything possible to provide them the nutrition they need to be healthy, active and ready to face the future – today we take an important step towards that goal."

The final standards make the same kinds of practical changes that many parents are already encouraging at home, including:

- Ensuring students are offered both fruits and vegetables every day of the week
- Substantially increasing offerings of whole grain-rich foods;
- Offering only fat-free or low-fat milk varieties;
- Limiting calories based on the age of children being served to ensure proper portion size; and
- Increasing the focus on reducing the amounts of saturated fat, trans fats and sodium.

A sample lunch menu with a before and after comparison is available to view and download in [PDF](#) and [JPG](#) formats. USDA built the new rule around recommendations from a panel of experts convened by the Institute of Medicine — a gold standard for evidence-based health analysis. The standards were also updated with key changes from the 2010 Dietary Guidelines for Americans – the Federal government's benchmark for nutrition – and aimed to foster the kind of healthy changes at school that many parents are already trying to encourage at home, such as making sure that kids are offered both fruits and vegetables each day, more whole grains, and portion sizes and calorie counts designed to maintain a healthy weight.

USDA received an unprecedented 132,000 public comments on its proposed standards (available on the web at www.regulations.gov) – and made modifications to the proposed rule where appropriate. USDA Under Secretary Kevin Concannon said: "We know that robust public input is essential to developing successful standards and the final standards took a number of suggestions from stakeholders, school food service professions and parents to make important operational changes while maintaining nutritional integrity."

The new standards are expected to cost \$3.2 billion over the next five years -- less than half of the estimated cost of the proposed rule and are just one of five major components of the Healthy Hunger Free Kids Act, now implemented or under development, that will work together to reform school nutrition. In addition to the updated meal standards, unprecedented improvements to come include:

- **The ability to take nutrition standards beyond the lunchline** for the first time ever, foods and beverages sold in vending machines and other venues on school campuses will also contribute to a healthy diet;
- **Increased funding for schools** – an additional 6 cents a meal is the first real increase in 30 years – tied to strong performance in serving improved meals;
- **Common-sense pricing standards for schools** to ensure that revenues from non-Federal sources keep pace with the Federal commitment to healthy school meals and properly align with costs; and
- **Training and technical assistance** to help schools achieve and monitor compliance.

The final nutrition standards released today also provide more time for schools to implement key changes, which will be largely phased in over a three-year period, starting in School Year 2012-2013. For example, schools will be permitted to focus on changes in the lunches in the first year, with most changes in breakfast phased in during future years.

USDA's [Food and Nutrition Service](#) administers 15 nutrition assistance programs including the National School Lunch and School Breakfast programs, the Summer Food Service Program, and Supplemental Nutrition Assistance Program, and the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC). Together these programs make up the federal nutrition safety net.

Press Release found here: <http://www.fns.usda.gov/pressrelease/002312>.

Using MyPlate

USDA's MyPlate, shown below, symbolizes a personalized approach to healthy eating. The symbol has been designed to *remind* Americans to eat healthfully; it is not intended to change consumer behavior alone. The messages in MyPlate mirror the messages of the *Dietary Guidelines for Americans, 2010*, and illustrate the five food groups using a familiar mealtime visual, a place setting.



- Five food groups are represented on the plate: fruits, vegetables, grains, protein and dairy.
- The portions are not equal. This represents how much of the meal should go to each food group.
- The symbol shows that half of the plate should be fruits and vegetables.
- The plate itself, as well as the division of portions signifies the importance of portion control.

For more information about MyPlate, visit www.ChooseMyPlate.gov.

Final Rule Nutrition Standards in the National School Lunch and School Breakfast Programs – Jan. 2012

	Breakfast Meal Pattern			Lunch Meal Pattern		
	Grades K-5 ^a	Grades 6-8 ^a	Grades 9-12 ^a	Grades K-5	Grades 6-8	Grades 9-12
Meal Pattern	Amount of Foods Per Week (Minimum Per Day)					
Fruits (cups) ^{c,d}	7 (1) ^e	7 (1) ^e	7 (1) ^e	3½ (½)	3½ (½)	7 (1)
Vegetables (cups) ^{c,d}	0	0	0	5 1/4 (¾)	5 1/4 (¾)	7 (1)
Dark green ^f	0	0	0	½	½	½
Red/Orange ^f	0	0	0	¾	¾	1¼
Beans/Peas (Legumes) ^f	0	0	0	½	½	½
Starchy ^f	0	0	0	½	½	½
Other ^{f,g}	0	0	0	½	½	¾
Additional Veg to Reach Total ^h	0	0	0	2 ½	2 ½	3 ½
Grains (oz eq) ⁱ	10 (1) ^j	11 (1) ^j	12.5 (1) ^j	11 (1)	11 (1)	14 (2)
Meats/Meat Alternates (oz eq)	0 ^k	0 ^k	0 ^k	11 (1)	12.5 (1)	14 (2)
Fluid milk (cups) ^l	7 (1)	7 (1)	7 (1)	7 (1)	7 (1)	7 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week						
Min-max calories (kcal) ^{m,n,o}	350-500	400-550	450-600	550-650	600-700	750-850
Saturated fat (% of total calories) ^{n,o}	< 10	< 10	< 10	< 10	< 10	< 10
Sodium (mg) ^{n,p}	≤ 430	≤ 470	≤ 500	≤ 640	≤ 710	≤ 740
Trans fat ^o	Nutrition label or manufacturer specifications must indicate zero grams of <u>trans</u> fat per serving.					

^aIn the SBP, the above age-grade groups are required beginning July 1, 2013 (SY 2013-14).

^bFood items included in each food group and subgroup and amount equivalents. Minimum creditable serving is ¼ cup.

^cOne quarter-cup of dried fruit counts as ½ cup of fruit; 1 cup of leafy greens counts as ½ cup of vegetables. No more than half of the fruit or vegetable offerings may be in the form of juice. All juice must be 100% full-strength.

^dFor breakfast, vegetables may be substituted for fruits, but the first two cups per week of any such substitution must be from the dark green, red/orange, beans and peas (legumes) or “Other vegetables” subgroups as defined in §210.10(c)(2)(iii).

^eThe fruit quantity requirement for the SBP (7 cups/week and a minimum of 1 cup/day) is effective July 1, 2014 (SY 2014-2015).

^fLarger amounts of these vegetables may be served.

^gThis category consists of “Other vegetables” as defined in §210.10(c)(2)(iii)(E). For the purposes of the NSLP, “Other vegetables” requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups as defined in §210.10(c)(2)(iii). ^hAny vegetable subgroup may be offered to meet the total weekly vegetable requirement.

ⁱAt least half of the grains offered must be whole grain-rich in the NSLP beginning July 1, 2012 (SY 2012-2013), and in the SBP beginning July 1, 2013 (SY 2013-2014). (SY 2013-2014). All grains must be whole grain-rich in both the NSLP and the SBP beginning July 1, 2014 (SY 2014-15).

^jIn the SBP, the grain ranges must be offered beginning July 1, 2013 (SY 2013-2014).

^kThere is no separate meat/meat alternate component in the SBP. Beginning July 1, 2013 (SY 2013-2014), RCCIs may substitute 1 oz. eq. of meat/meat alternate for 1 oz. eq. of grains after the minimum daily grains requirement is met.

^lFluid milk must be low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored).

^mThe average daily amount of calories for a 7-day week must be within the range (at least the minimum and no more than the maximum values). ⁿDiscretionary sources of calories (solid fats and added sugars) may be added to the meal pattern if within the specifications for calories, saturated fat, trans fat, and sodium. Foods of minimal nutritional value and fluid milk with fat content greater than 1 percent milk fat are not allowed.

^oIn the SBP, calories and trans fat specifications take effect beginning July 1, 2013 (SY 2013-2014).

^pFinal sodium specifications are to be reached by SY 2022-2023 or July 1, 2022. Intermediate sodium specifications are established for SY 2014-2015 and 2017-2018. See required intermediate specifications in § 210.10(f)(3) for lunches and §220.8(f)(3) for breakfast

Chart 3 NATIONAL SCHOOL LUNCH PROGRAM MEAL PATTERN AFTERSCHOOL SNACKS

SELECT TWO OF THE FOUR COMPONENTS FOR A REIMBURSABLE SNACK

FOOD COMPONENTS AND FOOD ITEMS ¹	CHILDREN AGES 1 and 2	CHILDREN AGES 3-5	CHILDREN AGES 6-12 ¹
Milk			
Fluid milk	4 fl oz (1/2 cup)	4 fl oz (1/2 cup)	8 fl oz (1 cup)
Vegetable or Fruit^{2,9}			
Juice ^{2,9} , fruit, and/or vegetable	1/2 cup	1/2 cup	3/4 cup
Grains/Breads^{3,4}			
Bread <i>or</i>	1/2 slice	1/2 slice	1 slice
Combread or biscuit or roll or muffin <i>or</i>	1/2 serving	1/2 serving	1 serving
Cold dry cereal ⁵ <i>or</i>	1/4 cup or 1/3 oz ⁴	1/3 cup or 1/2 oz ⁴	3/4 cup or 1 oz ⁴
Cooked cereal grains <i>or</i>	1/4 cup	1/4 cup	1/2 cup
Cooked pasta or noodles	1/4 cup	1/4 cup	1/2 cup
Meat/Meat Alternate^{6,6,7}			
Lean meat or poultry or fish ⁵ <i>or</i>	1/2 oz	1/2 oz	1 oz
Alternate protein products ⁶ <i>or</i>	1/2 oz	1/2 oz	1 oz
Cheese <i>or</i>	1/2 oz	1/2 oz	1 oz
Egg (large) <i>or</i>	1/2 large egg	1/2 large egg	1/2 large egg
Cooked dry beans or peas <i>or</i>	1/8 cup	1/8 cup	1/4 cup
Peanut or other nut or seed butters <i>or</i>	1 tbsp	1 tbsp	2 tbsp
Nuts and/or seeds ⁷ <i>or</i>	1/2 oz ⁷	1/2 oz ⁷	1 oz
Yogurt ⁸	2 oz or 1/4 cup	2 oz or 1/4 cup	4 oz or 1/2 cup

¹ Children age 12 and older may be served larger portions based on their greater food needs. They may not be served less than the minimum quantities listed in this column.

² Full strength vegetable and/or fruit juice or an equivalent quantity of any combination of vegetable(s), fruit(s), and juice.

³ Grains/Breads must be whole-grain or enriched, or made from whole-grain or enriched flour or meal that may include bran and/or germ. Cereal must be whole-grain, enriched, or fortified.

⁴ Either volume (cup) or weight (oz), whichever is less.

⁵ A serving consists of the edible portion of cooked lean meat or poultry or fish.

⁶ Alternate protein products must meet requirements in Appendix A of 7 CFR Part 210.

⁷ Nuts and seeds are generally not recommended to be served to children ages 1-3 since they present a choking hazard. If served, nuts and seeds should be finely minced.

⁸ Yogurt may be plain or flavored, unsweetened, or sweetened - commercially prepared.

⁹ Juice may not be served when milk is the only other component.

Offer vs. Serve

(Lunch Only)

Basics:

- Offer vs. Serve is not a style of serving or offering such as the students serving themselves or the way food is offered; a school is either implementing Offer vs. Serve or not implementing Offer vs. Serve.
- Offer vs. Serve gives students the ability to decline up to two components and still credit the meal as reimbursable.*
 - *Students must take at least ½ cup of fruit, vegetable, or a combination of both to be a reimbursable meal.
- This is optional for K-12 in RCCIs.
- A reimbursable meal can have 3, 4, or 5 components.
- Must take the minimum requirement of any of the components to count toward a reimbursable meal.

Is This Reimbursable?

Decide if the following menu items on a student's tray create a reimbursable meal.

1. Sandwich (2 oz. eq. grains and 2 oz. eq. meat) and Milk (8 oz.)
2. Sandwich (2 oz. eq. grains and 2 oz. eq. meat) and ½ cup Peaches
3. Spaghetti (2 oz. eq. grains), Breadstick (1 oz. eq. grains), and 1 cup Green Beans
4. Spaghetti (2 oz. eq. grains) and Meat Sauce (2 oz. eq. meat and ½ cup vegetable)
5. Milk (8 oz.), ½ cup Sweet Potato Fries, 1 cup Apple Slices
6. Breadstick (2 oz. eq. grains), ½ cup Lettuce, Milk (8 oz.)
7. Crackers (1 oz. eq. grains), Peanut Butter (1 oz. eq. meat/meat alternative), 1 cup Applesauce, 1 cup Corn
8. Sandwich (2 oz. eq. grains and 2 oz. eq. meat), ¼ cup Strawberries, ¼ cup Refried Beans

Resources:

Offer vs. Serve (use these resources to train foodservice staff how to identify a reimbursable meal)

<http://www.doe.in.gov/student-services/nutrition/snp-new-meal-pattern>.

Is This Reimbursable? Answers:

1. No, missing ½ cup fruit and/or vegetable 2. Yes 3. No, only two components- grains and vegetable, needs one more component 4. Yes 5. Yes
6. No, lettuce credits as ¼ cup of vegetable, needs ¼ cup more fruit and/or vegetable 7. Yes and No, this works for grades K-5 and 6-8 but there are not enough grains or meat/meat alternative for grades 9-12 8. Yes

Breakfast and Lunch Food Production Record

Site: _____

Meal Date: _____

Meal Pattern: check one and the corresponding grade group(s) used for menu planning

New Meal Pattern – HHFKA Offer vs. Serve Yes No

- K-5
- 6-8
- 9-12

Number of Meals Served
Reimbursable Student Meals: _____
Adult Meals: _____
Total Meals: _____

A Menu Item, Recipe # or Product Name	B Grade Group	C Serving Size	D Form, Pack Size, & Pack Medium	E Servings per Purchase Unit	F Total # of Servings Planned	G Total # of Servings Prepared	H Total # of Servings Leftover	I # of Servings Taken/Served (Column G minus Column H)	J Units/Amount of Food Prepared (lbs., cans, etc.)
Meat/Meat Alternate									
Vegetable									
Fruit									
Grains/Bread									
Milk/Desserts/Condiments, etc.									

Instructions for Completing the IDOE SCNP Food-Based Production Record

A	Menu Item/Recipe # or Product Name	List all menu items and recipes for reimbursable meals. Identify recipe numbers and CN Labeled products.
B	Grade Group	List the grade group(s) used for menu planning. The grade group(s) should correspond to the grade group (s) on the meal pattern column(s) used for menu planning.
C	Serving Size	List the actual serving size of each menu item provided to the students.
D	Form, Pack Size, & Pack Medium	When applicable: Form (fresh, canned, frozen, raw, cooked, etc.) Pack Size (size of can, etc.) Pack Medium (canned in light syrup or juice)
E	Servings/Purchase Unit	This information can be determined from: the Food Buying Guide, product packaging, or from the manufacturer's information included on the product specification or nutrition information sheet.
F	Total # of Servings Planned	List the total number of servings planned for each menu/food item.
G	Total # of Servings Prepared	List the total number of servings prepared for each menu/food item.
H	Total # of Servings Leftover	Count the number of leftover servings for each item. (example - 3 sandwiches, 6 milks, 10 oranges, 4 servings of rice) If any amount remains in pans, convert to number of servings.
I	# of Servings Taken/Served (Column G minus Column H)	Number of servings taken/served -- Column G minus Column H
J	Units/Amount of Food Prepared	The # of units (pounds, cans, bags, cases, etc.) used to prepare the amount in Column G (example - 5 #10 cans).

10/2010

MENU PLANNING TIPS

Student Acceptance - Planning menus requires special care. Food service personnel must not only plan meals that meet meal requirements, but they must also strive to provide meals with food items that are acceptable to children. Only then will they consume the whole meal, and only then will they receive the full nutritional value of the meal offered to them.

To achieve this goal, food service personnel must know the preferences of their customers. Two ways to learn children's choices are to have tasting panels for children and to have children help plan menus. Another way to evaluate acceptance of each menu item is to review past food production records and food waste each time specific items are served. If you observe over time that an item is unpopular, try revising the recipe or using a different brand of a processed product before substituting more popular but less nutritious foods.

Food service personnel can rely on their experience and knowledge in order to maximize both acceptability and nutrition in the meals they provide.

Offering Choices - Try to offer as many choices as possible of different foods within each food component group. Offering choices give children more of an opportunity to select foods they will eat and recognizes the fact that not all children have the same tastes. It also increases the chances that children will select a full meal. For instance, if three or four fruits and vegetables were offered, it is more likely that children will select and eat at least two. One of the goals of the NSLP and the SBP is to encourage the consumption of a wide variety of nutritious foods in well-balanced, healthy meals. Offering carefully planned choices can result in increased customer satisfaction, improved nutritional awareness and less food waste.

Practical Ideas - The following suggestions are tips to make your lunches and breakfasts complete and more attractive to children. The success of your lunch and breakfast programs depends on how appealing children find the meals. The attractiveness of meals is particularly important in areas where OvS has been implemented, in order to ensure that children will take meals that meet minimum requirements for reimbursement.

Regulations allow the meat/meat alternate to be served in the main dish **or** in the main dish and in one other menu item. However, it is easier to determine that a complete component has been taken if the main dish contains the full serving of a meat/meat alternate. If a menu is occasionally planned in which the meat/meat alternate is split between menu items (e.g., a soup and sandwich combination), serve the two items together.

In RCCIs that **do not** offer choices of meat/meat alternates each day, it is recommended that no one form of meat (e.g., ground, sliced) be served more than three times a week. For example, four items made with ground beef, such as tacos, spaghetti with meat sauce, hamburgers and meatloaf should not be served in a single week. Likewise, no one form of meat alternate foods (cheese, cooked dry beans or peas, eggs, peanut butter or other nut/seed butters, peanuts, soy nuts, tree nuts, and seeds) should be served more than three times a week. Four cheese items such as grilled cheese sandwich, macaroni and cheese, cheese pizza and cheese lasagna should not be served in a single week. Greater variety can increase the appeal, and therefore consumption, of meals.

RCCIs that **do** offer choices of meat/meat alternates each day may serve any one meat alternate or form of meat as frequently as good menu planning practices allow. Remember to consider meats such as ground turkey in order to add variety to and lower the fat content of the meals served.

Plan only full servings of grains/breads. If there are two menu items containing this component, be sure each of these items contains a full serving. For example, if chicken with rice and a dinner roll is served, each should provide a full serving. Either the rice or the roll can then be counted as a grains/breads item. Otherwise, if the rice does not contain a full serving and the child opts for the rice, but not the dinner roll, the meal may be incomplete.

Studies indicate children consume more fruit, raw vegetables and potato dishes than other cooked vegetables (for example, children take more orange wedges than cooked spinach). Plan larger portions of these foods and smaller portions of cooked vegetables. Use fresh, canned, frozen and dried fruits interchangeably.

You can look to different kinds of whole grain breads to enhance your breakfast program:

- Use a variety of hot breads (e.g., cornbread made with “whole corn”) and different kinds of muffins and biscuits.
- Try breakfast rolls made with bulgur, rolled wheat or oats.
- Include breakfast sandwiches, pancakes, waffles and French toast as additional menu options.
- Serve hot cereals or use dry cereals, including those made from whole-grain wheat, corn, rice, and oats. Try to avoid cereals with high sugar content.

Coordinating Breakfast and Lunch Menus

- Avoid repeating the same food items for different meals during the day. For example, try not to serve orange juice at breakfast and again at lunch. All meals served should consist of complementary food items, so that the end result will be well-balanced meals for the day.
- Be sure the equipment you use for the preparation of breakfast will not interfere with what you need to prepare for lunch.
- Schedule personnel carefully so they can be effective and efficient.

INSTRUCTIONS FOR CHECK-OFF LIST

This form is designed to be used at the point of service to mark as children receive reimbursable meals. It is marked as children pass the point of service and identify themselves by name.

- 1) Month & Year: Enter the current month and year.
- 2) Site: Enter the name of the site or RCCI.
- 3) Child Name: List all students in the class alphabetically. (Do not group students by meal type or code.)
- 4) Code: Mark your code indicating whether the child is eligible to receive his lunch free, reduced-price, or paid. (Children should not be able to identify each other's eligibility.)
- 5) MTUWTHFSASU: Fill in appropriate dates. The first date recorded should be entered in the block that represents that day of the week. For example, if November 1 falls on a Thursday enter 1 in the fourth block of the first group. Continue entering each day of the meal service for the month.
- 6) Books: As the child receives a reimbursable meal, put a hash mark in the appropriate box for the day.
- 7) Total Free: Total the free hash marks for that day and enter the total number of reimbursable free meals served.
- 8) Total Reduced-Price: Total the reduced-price hash marks for that day and enter the total number of reimbursable reduced-price meals served.
- 9) Total Paid: Total the paid hash marks for that day and enter the total number of reimbursable paid meals served.
- 10) Total Meals: Sum the totals of free, reduced-price, paid and enter the total number of meals served.

Signature _____ Title _____

Instructions

This is used to record the daily meal counts for each school for reporting each month. We emphasize the importance of keeping this form and filing it with your copy of the claim form. This document should be used to “edit check” the monthly claim.

Entries must be posted daily. This form must be kept on file for a period of at least three years, not including the current year. Do not send this form to the state agency.

Edit checks will need to be completed and signed at the end of the month prior to submitting the monthly claim. The number of meals served should be compared to the maximum number eligible (attendance factor times the number eligible), as well as the number eligible in the corresponding category. Should the number served exceed any of the comparable totals, justification should be documented in column 9.

This is not a required form; however, the data listed is pertinent and is the required minimum and must be included on any form the SFA chooses to use.

- Enrollment : Enter the number of children who have access to meals. The school should use the highest number during the month.
- Attendance Factor: Divide the average daily attendance (ADA) by the enrollment to obtain the local attendance factor or use the state factor, whichever is greater.
- Number of days meals served: Enter the number of day in operation for the month.
- Attendance Factor times the number Eligible: This figure represents the number of meals eligible by category on a daily basis for edit check purposes only. The school should use the largest number of eligibles recorded for the month in each category.
- Signature and Title: The person responsible for completing the edit check should sign when the form is complete.

- Column 1 Enter the total number of paid children eligible to receive a meal.
- Column 2 Enter the number of approved FREE children’s applications on file
- Column 3 Enter the number of approved REDUCED children’s applications on file
- Column 4 Enter the day of the month
- Column 5 Enter the number of meals served to paid children
- Column 6 Enter the number of meals served to children who have been approved for free meals
- Column 7 Enter the number of meals served to children who have been approved for reduced price meals
- Column 8 Enter the sum total of columns 5, 6, and 7
- Column 9 Justification is needed here if any of the comparisons exceed the numbers eligible or when compared against the attendance factor.

How to Calculate the Average per Meal Food Cost for a Breakfast and a Lunch

For a complete cycle of menus (no less than 14 days) calculate the food cost for each breakfast and lunch. The cost per serving for each item in the menu would be calculated by dividing the per unit purchase price of an item by the number of servings obtained per purchase unit. Example: 24 servings of fruit from a can costing \$2.40 would give a cost per serving of \$0.10.

Example of one day:

<u>Breakfast</u>		<u>Lunch</u>	
Milk	\$0.18	Milk	\$0.18
Juice	0.20	Fruit	0.20
Cereal	<u>0.33</u>	Vegetable	0.20
	\$0.71	Bread	0.15
		Main Dish	0.50
		Dessert	<u>0.17</u>
			\$1.40

Add the cost of each breakfast (at least 14 days) together and divide the total by the number of days to get the average cost per breakfast. Do the same for lunches.

MEAL COUNT POLICY PROTOTYPE

CHILD NUTRITION PROGRAM

As a qualifying Residential Child Care Entity, we are reimbursed for certain meals and snacks served to the residents of the “Residential Child Care” program. It is our desire to maximize use of this reimbursement money by complying with regulations as effectively and efficiently as possible. Reimbursement is made to **(Insert Name of RCCI)** by the United States Department of Agriculture (USDA) for the number of qualifying meals or snacks actually served. In order to request reimbursement, **(Insert Name of RCCI)** must have a procedure to document the number of meals or snacks served at the time the service actually takes place. Accordingly, a meal count policy has been developed to gather the required information.

The number of qualifying meals and snacks served each day should be counted and recorded daily. **This count should be done at the time the meals or snacks are served.** The meal count for each building should be recorded daily and returned to the meal count administrator by the end of the last day of the month.

Meals to be counted and recorded:

- a) **Breakfasts** – The number of resident children served breakfast in the institution on any day of the year. This includes weekends, holidays, and summer time. School **does not** have to be in session for us to claim reimbursement for breakfasts served. We are able to count a breakfast meal when purchased provided that **all** of the food groups and their correct portions are purchased.
- b) **Lunches** – The number of residents served lunch on any day of the year. This includes weekends, holidays, and summer time. School **does not** have to be in session for us to claim reimbursement for lunches served. Lunches should also be counted if a resident takes a sack lunch prepared to school (either on-campus or public) or to any other activity. However, lunches should not be counted if the resident purchases the lunch at ***a public*** school. We are able to count a lunch meal that we purchase (e.g. on break, for Sunday church lunch) provided that **all** of the food groups and their correct portions are purchased or served.
- c) **Lunches – On-Campus of the RCCI** – Residents attending school on-campus are required to bring their own sack lunch. In order for **(Insert Name of RCCI)** to be able to account for this meal, the resident needs to bring a lunch that will provide them with **all** food groups and their correct portions. Should a resident not bring a qualifying lunch, in order for **(Insert Name of RCCI)** to account for this lunch, the school staff would need to serve the resident staples available at the school from the food groups and their correct portions. (Such as ¼ cup of peanut butter, 1 bread slice, either 2 fruits or 2 vegetables or 1 of each and 8 oz. of milk served in a 10 oz. cup, etc.) The portions need to be served to the resident and if they choose not to eat, we need to dispose of the food unless it is individually packaged and unopened. All on-campus school lunches are eligible for the program if the above procedures are followed.
- d) **After-School Snacks** – The number of residents served snacks after school on any school day when a formal tutoring program is taking place. School **does** have to be in session for us to claim reimbursement for after-school snacks served. If school is cancelled, we cannot count the snack. If the public school is cancelled, we can still count the snacks for all kids **if the on-campus school was still in session.** The appropriate snack meal pattern must be followed to count the snack for reimbursement.
- e) **Offer vs. Serve during Lunch and Breakfast** –A number of servings must be offered but then requires that a number must also be served. For example, for lunch, 5 servings from various categories must be offered but only 3 servings need to be taken by the child. When a child packs their lunch, all 5 categories must be offered but they are only required to take 3 for the meal. If they drink milk at the school that counts as 1 category so they are only required to take 2 other categories for the meal to count.