

Chapter 10: Meal Service Policies

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Equal Access for All Students

When a school offers more than one type of reimbursable meals or when a variety of food and milk choices are offered, all children must be offered the same selections regardless of whether the students are eligible for free, reduced-price or paid meals. If certain items are not available to all students, those items cannot count towards reimbursable meals.

Reimbursable meals are allowable as part of special functions such as holiday celebrations, “reward” parties, field trips, etc. The School Food Authority (SFA) must ensure that:

- Student meals cannot be denied because of disciplinary action.
- Students are not overtly identified by eligibility category.
- Meals meet program requirements.

Meal Times

Breakfast

School Breakfast Program (SBP) regulations require breakfast to be served in the morning hours, at (or close to) the beginning of the students’ day at school. In most circumstances, this is prior to 10 a.m. Districts are encouraged to allow students to eat breakfast when they arrive late. However, this is not a requirement.

Lunch

Regulations for the National School Lunch Program (NSLP) require that lunch service be between 10 a.m. and 2 p.m. Half days and early release days may deviate within reason.

Evening Hours

Some SFAs have requested alternative feeding times. Evening meals cannot normally be considered lunch and are therefore not normally reimbursed. However, exemptions are sometimes granted for SFAs serving traditional high school students at non-traditional times. It is important to note that exemptions will not be granted for students in evening adult education courses or in delayed diploma programs.

Deviations and Exemptions

Occasional deviations from these guidelines are permissible in the event of unexpected disruptions to the regular school day schedule, such as late arrival or early dismissal due to inclement weather, loss of electricity, or other unique circumstances.

In the event that a school routinely serves meals outside of the time parameters established by the United States Department of Agriculture (USDA), a written request for an exemption must be submitted to the SCDE Office of Nutrition Programs, to include the specific circumstances requiring the exemption and proposed serving times. Granted approvals are on a case-by-case basis and may require the additional approval of USDA.

Allow Adequate Time to Eat

All public schools in South Carolina must serve both breakfast and lunch. Breakfast should be served during a specified “breakfast meal period.” The same is true for lunch. While it is the responsibility of each SFA to determine the length of its meal periods, consider following these guidelines:

1. Organize the serving times to move students through as quickly as possible.
2. Stagger serving periods to minimize waiting time.
3. Monitor the time it takes to serve students from the time they begin waiting in line until seated at the table.
4. Provide students adequate time to eat.
5. Allow students 1-2 minutes to clean up and prepare to return to the classroom or go to recess.

Lunch: A minimum of 15 to 20 minutes from the time a student is seated until they leave the cafeteria/dining area is recommended. For public and charter schools serving a K-5 population, the South Carolina Student Health and Fitness Act requires a minimum of 20 minutes for students to eat once served. According to student focus groups conducted in several South Carolina schools, anything less than 25 minutes is inadequate. Many students prefer to skip lunch rather than to stand in line and be rushed.

Breakfast: A minimum of 10 to 20 minutes from the time a student is seated until they leave the cafeteria/dining area is recommended.

Meals Cannot Be Denied As Disciplinary Action

Federal regulations prohibit SFAs from denying a meal or any part of a meal to a student as a disciplinary action. This applies regardless of the student’s eligibility category.

Disciplined students can sit at a separate table or served in a different location. They must be offered a reimbursable meal that provides the same quantity and quality of food available to other students. It is permissible to serve a complete reimbursable meal (rather than offer choices) to a student being disciplined.

Policies Related to In-School Suspension (ISS)

If the site participates in the National School Lunch Program (NSLP), enrolled students attending school during normal school hours must be offered reimbursable school meals at participating sites. This applies to ISS sites located off campus as well as ISS sites located in the school building.

South Carolina public schools must offer breakfast in all school buildings. If the ISS location does not have food service available, the SFA is still required to offer breakfast.

Students in ISS units may be provided a lunch that is different than the meal served to students in the cafeteria, but if the meal is to be claimed for reimbursement, it must meet all meal pattern requirements.

Students in an ISS unit may be required to eat in a different location or at a different time from other students as long as the meal is served during the SFA's regular meal times and the meal meets meal pattern requirements.

Lost, Stolen & Misused Meal Tickets

SFAs may establish their own procedures regarding the handling of lost, stolen, and misused free, reduced-price and paid meal tickets. However, any system which limits the number of tickets reissued must conform to the following standards:

1. Parents and students must be advised of the SFA's policy regarding missing meal tickets and of the student's corresponding responsibility for their tickets. Such notice shall be provided to all households at the time they begin receiving or purchasing meal tickets.
2. A minimum of three replacements, or special meal arrangements resulting from three lost or stolen tickets, must be allowed to each student within each school year (includes initial ticket plus three replacements).
3. The school must maintain a list of students who have reported missing original tickets in the current school year and the number of occurrences for each student. Prior to denying a meal to any student without a ticket, the list should always be reviewed to determine if the student has already had at least three ticket replacements or special meal arrangements for lost or stolen tickets within that school year.
4. At least one advance written warning must be given to the student and the parent(s) prior to refusal to allow additional meals or ticket replacements. The written warning must include an explanation that the student has repeatedly requested replacement tickets and that each subsequent time the student fails to have a ticket that he/she will be expected to either bring lunch/breakfast or pay full price for lunch/breakfast. Form 6-A, Notification of Ticket/Card Replacement, provided at the end of this chapter, may be used for this purpose.
5. Meals must always be provided to pre-kindergarten, kindergarten, and disabled students who may be unable to take full responsibility for a meal ticket.

Using the above criteria, SFA officials may develop the most administratively feasible system to handle the missing tickets as determined by individual SFA circumstances and frequency of ticket issuance. In cases of repeated ticket loss or misuse, SFA administrators may wish to contact an adult household member to arrange a meeting to discuss the problem.

Replacement of Multiple-Purpose Cards

Some systems use a multiple-purpose card for meal counting, student identification, library checkout, etc. The school administrative office may charge the student to replace the card, but alternate meal arrangements must be made in order to allow the student to eat lunch or breakfast until a replacement card is issued. Examples of alternate meal arrangements are listed in the section entitled, “Serving Students with Misplaced Meal Tickets/Cards.” It is important to keep in mind that meals cannot be denied to students unless the lost, stolen, misused and damaged ticket procedures, as described in this section are followed.

Serving Students with Misplaced Meal Tickets/Cards

If an SFA issues meal tickets or cards, an alternate procedure must be in place to allow a student to eat a school lunch or breakfast when they do not have their meal ticket/card with them. The procedure should allow for accurate meal accountability and should ensure that the eligibility category of a student eligible for free or reduced-price meals is not identified in the process. Schools have several options:

- Students may be asked to go to the end of the serving line so students with tickets can be served more efficiently. When served, a search of the student’s name is looked up on the electronic accountability system or the student’s name recorded so that the student will be accurately charged and the meal accurately claimed for reimbursement.
- Students may be asked to go to the office to pick up a one-day or replacement ticket. The replacement-type ticket must allow the point-of-service accountability system to accurately count the meal by category. A code may be placed on the replacement ticket so the ticket clerk can identify the meal category.
- If a computerized system is used, the student’s name or bar code number may be entered manually into the computerized system.
- Students may be allowed to record their name on a list at the point-of-service. The list may be coded after meal service so the meal is accurately claimed in the correct meal category for each student. The list must be maintained on file with the day’s accountability documentation to support the meal counts for that day.

Schools have several methods available to reduce the number of students that come to the line without tickets including:

- Teachers distribute tickets to students just before meal service.
- Tickets are stored in a card rack near the food service cashier. Students pick up their tickets from the rack and give the ticket to the clerk at the point-of-service. The clerk must look at the ticket to assure the student presented his/her own ticket. The clerk replaces the tickets on the rack following the meal service period. Ticket racks or trays must be stored securely when meals are not served.
- The cashier scans bar codes instead of issuing a ticket/card.
- If a computerized accountability system is used, students can enter their own Personal Identification Numbers (PINs) at the point-of-service. The ticket clerk would be required to watch the computer monitor to assure the student used his/her own PIN.

Serving Students with No Money and Without a Lunch from Home

While addressing unpaid meal charges is ultimately a local policy, Section 143 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) requires that SFAs establish and communicate clear policies on collecting payments for school meals. SFAs may use a variety of outreach strategies, such as sending requests to parents for repayment (via phone, email, or letter) or involving school officials to facilitate repayment.

Charge Policy

A charge policy is necessary when a student comes to school without money or a lunch from home is:

1. given a meal and the meal is charged to the student account on the day the meal is served to the student
2. allow the student to charge a minimum of 1-3 days
3. given an opportunity to call his/her parents so they may make provisions for his/her meal.

No-Charge Policy

Many SFAs have adopted a no-charge policy meaning the student who comes to school without money or a lunch from home is:

1. given an alternative meal which may or may not meet the meal pattern requirements for a reimbursable meal
2. given an opportunity to call his/her parents so they may make provisions for his/her meal.

Note from Principal's Office Exchanged for a Meal

SFAs desiring to provide a controlled method for limited charges involve the principal's office in the process. The student must go to the office where he/she receives a note, later exchanged on the serving line for a meal. At the end of the day, the food service personnel exchanges the note in the office for cash. This method removes Child Nutrition Program personnel from accounting and collecting for charged meals. Additionally, the administrative staff may aid a student who may have a problem with a parent or guardian providing meals because they are aware of the situation.

Exchange of Food by Students

The exchange of food by students is not prohibited by law, but is discouraged for health and sanitation reasons. Implementing the Offer versus Serve provision may help eliminate some of the motivation for students to exchange food.

Adults Eating Food Intended for Students

Adults may not eat foods from the reimbursable meals served to students. In addition, adults may not take any foods for their own consumption that were previously served to students, even if the students do not plan to eat or drink the food item(s). For example, an adult should not take unopened milk (that was not consumed by students) from a "share table."

Students Working in the Cafeteria

Regulations state that recipients of free and reduced-price benefits shall not be required to work for those benefits. However, they are not prohibited from voluntarily working in the cafeteria. Some SFAs employ student helpers in the kitchen or serving area for monetary or other compensation. In these cases, parents of all workers must be informed, in writing, that their children have volunteered to work. The letters must state that, if the children have been certified as eligible for free and reduced-price benefits, their continued eligibility is in no way dependent upon working. In addition, the letters should not be a part of or attached to the free and reduced-price letters to parents, applications, or notices of approval or denial.

It is also important to note that students under the age of eighteen are subject to federal and state child labor laws governing what tasks can be performed and/or equipment can be used. Contact SCDE for more information.

Guidance for Year-Round Schools

USDA has determined that SFAs participating in the SBP and NSLP as part of their year-round program may provide meals to students who are not in school because of school breaks or vacations if the students are engaged in school-sponsored educational activities. Year-round schools may claim reimbursements for eligible meals through the NSLP and SBP, but they must ensure that students are enrolled in school in an educational unit and that systems are in place to identify off-track students from other school students.

School-Prepared Field Trip Lunches

Reimbursable meals are to be served and consumed as part of the school day, either on school-premises or at a school-related location. School meals given to children to take home are not reimbursable. However, meals such as those taken on a school-supervised field trip may be reimbursed, if the field trip is part of the school day. For production purposes, a pre-count can be communicated prior to the planned field trip.

In order for field trip lunches to qualify for reimbursement, the SFA must ensure that each of the following criteria is met:

1. The field trip lunch must meet daily meal pattern requirements:
 - The menu must include a meat/meat alternate, a fruit, a vegetable, a grain/bread and fluid milk. All items must be included in the served meal. The portions must meet the component requirements for the age/grade group served.
2. The field trip lunch meal must be recorded on a food production record.
3. Point-of-service accountability must be used for sack lunch meals. A roster must be sent with the lunches and marked as students are served at the off-site location. The roster is returned to the lunch accountability staff person after the service of the meal. Based on

the marked roster, the number of sack lunches served is added to the school's lunch counts for the day.

4. Good sanitation practices must be followed. All potentially hazardous foods must be held in ice chests and ice must surround those foods. With the exception of milk, it is recommended that the number of potentially hazardous foods be limited when planning the sack lunch menu.
5. The sack lunches must be served between 10 a.m. and 2 p.m.

Requirements of Reimbursable Field Trip Lunch and Example(s) depending on Grade Group:

Sandwich with M/MA and Grains

$\frac{3}{4}$ - 1 cup of vegetables

$\frac{1}{2}$ - 1 cup of Fruit

Milk*

PB&J or Ham & Cheese Sandwich*

(w/condiment packets)

Carrot and Celery Sticks/Broccoli Florets

Juice/Whole Apple

Milk*

*Potentially Hazardous Food

Offer versus Serve for Field Trips

For schools using Offer versus Serve (OVS): note that OVS is not required for pre-packaged field trip meals, even for high school students. However, OVS is encouraged in order to reduce waste and allow students to choose what they would like to eat. When possible, allow students to select from the milk choices and the other available lunch components and/or breakfast items by setting up the serving line prior to the time students will leave for the field trip. With supervision to ensure reimbursable meals are selected: allow students to place menu items in their bag meals consistent with OVS. Students must select 3 of 5 components at lunch, including $\frac{1}{2}$ cup fruit and/or vegetable. Students must select 3 of 4 items at breakfast, including $\frac{1}{2}$ cup fruit and/or vegetable. Label bags with the name of the student. Students may enter their pin or student ID number but actual participation must be verified when the meal is served to provide accurate counts by eligibility category for the monthly claim.

Kindergarten and Pre-Kindergarten Programs

The SBP and NSLP may operate in schools of high school grade and under. This means that students attending kindergarten and pre-kindergarten programs are eligible to participate in the breakfast and lunch programs. At the discretion of the SFA, students attending school on a half-day basis may participate in the breakfast and lunch programs in operation.

A la Carte/Special Sales Service

If the SFA provides a la carte/special sales service and has implemented Offer versus Serve, any combination of foods that would comprise the minimum required food items of the planned meal, may be sold at the unit price for breakfast or lunch. The meal may be claimed for reimbursement as long as all required food items are made available to each student for breakfast

and lunch. In this case, a la carte/special sales items would have to be made available to students eligible for free and reduced-price meals. If students choose fewer than the required number of food items, a la carte/special sales prices should be charged and no reimbursement claimed. If additional foods not offered as part of the meal are selected, a la carte/special sales price should be charged for those items.

Meals served on an all-cash line may never be claimed for reimbursement, even though the same items are offered on another serving line. If certain lines are not made available to all students, including those receiving free or reduced-price meals, meals served on those lines may not be claimed.

A la Carte/Special Sales Service Provided by a Commercial Food Establishment

An SFA is prohibited by federal regulations from contracting with a food service management company (or commercial enterprise) to operate an a la carte/special sales food service unless the company agrees to offer free, reduced-price, and paid meals to all eligible students. This rule applies regardless of whether the commercial food service is operated in the cafeteria or in other campus locations.

Self-Serve/Theme Bars

In an effort to promote good nutrition and to provide an alternate menu choice for students, salad and other types of self-service/theme bars have been added to the meal choices available in many schools. The self-serve/theme bar may be priced on an a la carte/special sales basis or as a reimbursable meal. One advantage of offering it as a reimbursable meal is that students receiving all levels of benefits (free, reduced-price, and paid) have access to the additional service.

The following must be accomplished to claim reimbursement for meals selected from a self-serve bar:

- All menu items of the reimbursable lunch must be offered.
- The meal must be priced as a unit.
- The self-serve/theme bar must be available to students receiving all levels of benefits (free, reduced-price and paid).
- The menu items must be taken in the required amounts. If the school has Offer versus Serve, the minimum required number of menu items must be taken.
- Cashiers must be trained to recognize a reimbursable meal and the meal must be counted at the point of service.
- Food production records must be maintained on the self-service/theme bar.

Family Style Meal Service

As the name implies, family style meal service is a method of serving food to groups of students with adult supervision. Supervision is a key to the success of family style meal service. Under the guidance of the adult, students are encouraged to try new foods, make selections that eliminate excessive waste, demonstrate appropriate behaviors, and conversation at the table.

Prior to starting family style dining, the SFA should determine if it is a viable option for the school by evaluating:

- Expenses for extra serving dishes, utensils and additional dishwashing;
- Possible increases in food costs; and
- Storage space to determine if it is adequate to hold additional serving pieces.

If the decision is made to proceed with implementing family style service, then the SFA should:

- Contact SCDE before implementing any family-style meal service to ensure adequate meal accountability procedures are developed.
- Train teachers, staff, parents and students on proper hand washing, food handling and meal accountability.
- Establish ongoing food safety procedures. Refer to Safety & Sanitation for specific suggestions on keeping food safe.
- Establish a procedure to protect those students who have known food allergies.
- Develop an ongoing plan for input from staff, parents and students.

Procedures for Family Style Meals

During family style meal service, use the following procedures to assure food safety and that reimbursable meals are served.

- If the adult serves the food, the students must be given the opportunity to decline menu items in a program using the Offer versus Serve provision and must be served all menu items in programs that do not use the Offer versus Serve provision.
- Appropriate serving containers and utensils must be provided.
- Each serving bowl/platter must contain enough food to allow every person at the table to have a full portion of the menu item. After all students at the table have been served, leftover food may be offered as “seconds” at that table only. Food that has been on dining tables cannot be served at other meals or offered to students at other tables.

Meal Accountability in Family Style Meal Service

- An adult at each table must be able to identify a reimbursable meal.
- Each day an adult must account for the students who ate a reimbursable meal at each table. This can be accomplished by completing a roster or collecting meal tickets.

Using the Offer versus Serve Provisions in Family Style Meal Service

- Each adult must understand the meal components of a reimbursable meal and the appropriate portion sizes for each component.
- It is the student’s choice to decline foods in an Offer versus Serve program. No student can be required to make certain selections.
- The adult must ensure that no student takes such a large portion of the food provided that others are unable to receive the minimum required for a reimbursable meal.
- The menu options should be clearly explained to the students each day.

Commercially Prepared Ready-to-Eat Foods

When allowing local vendors to bring in prepared food to school feeding operations, only those food products prepared off-site by South Carolina Department of Health and Environmental Control “permitted” commercial establishments, may be utilized in the SBP and NSLP.

Questions and Answers

Q: May a la carte/special sales items be grouped and totaled to equal the price charged for a full-price lunch or breakfast and claimed for reimbursement?

An example would be 4 juices at \$0.50 = \$2.00 (the price of the lunch), or 5 milks at \$0.25 = \$1.25 (the price of the breakfast).

A: No. Only when the required food items are offered and the required number of food items are selected by the student can a reimbursable meal be claimed.

Q: May salads that are priced per ounce be claimed for reimbursement?

A: No. Reimbursable meals must be priced as a unit and all students must be allowed to choose the meal at the unit price.