

## Chapter 30: RCCI Manual

### Table of Contents

Background .....	4
History.....	5
Purpose.....	5
Applicable Federal Codes and Regulations .....	5
General Program Requirements.....	7
Qualifications of the Institution .....	7
Agreement with the State Agency (SA).....	8
Policy Statements for Non-Pricing Institutions .....	8
Food Safety .....	9
Wellness Policy.....	9
Civil Rights .....	10
On-Site Reviews .....	11
Free and Reduced Price Eligibility .....	12
Institutionalized Children.....	12
Day Students Attending RCCIs .....	13
RCCI Resident Attending Day School .....	14
Verification .....	14
Verification Summary Report (VSR) .....	15
Menu Planning.....	16
Meal Requirements: National School Lunch Program .....	16
Offer versus Serve (OVS).....	17
Family Style Meals .....	17
Food Production Records.....	18
Determining Portion Sizes .....	18
Meal Requirements: After School Snack Program .....	18
Smart Snacks.....	19
Eligibility for USDA Foods .....	20
Procurement .....	20
Office Phone: 803-734-4468.....	21
Financial Management.....	21
Recordkeeping .....	21
Reimbursement .....	21
Question about Reimbursement.....	22
Meal Counting and Claiming Systems .....	22
Check-Off List .....	22
RCCI Sack Lunches Sent to Schools .....	23

Non-Reimbursable Meals .....	23
Internal Controls .....	24
Written Instruction .....	24
Technical Assistance.....	25
State Agency Compliance Reviews .....	25
Administrative Review .....	25
Professional Standards .....	27
Eligibility Roster (Sample) .....	29
Meal Times .....	30
Breakfast .....	30
Lunch .....	30
Evening Hours .....	30
Deviations and Exemptions .....	30
Allow Adequate Time to Eat .....	30
Meals Cannot Be Denied As Disciplinary Action .....	31
Policies Related to In-School Suspension (ISS) .....	31
Lost, Stolen & Misused Meal Tickets.....	32
Replacement of Multiple-Purpose Cards .....	32
Serving Students with Misplaced Meal Tickets/Cards .....	33
Serving Students with No Money and Without a Lunch from Home.....	33
Charge Policy.....	34
No-Charge Policy.....	34
Note from Principal's Office Exchanged for a Meal .....	34
Exchange of Food by Students .....	34
Adults Eating Food Intended for Students.....	34
Students Working in the Cafeteria .....	34
Guidance for Year-Round Schools .....	35
School-Prepared Field Trip Lunches .....	35
Requirements of Reimbursable Field Trip Lunch and Example(s) depending on Grade	
Group: .....	36
Offer versus Serve for Field Trips .....	36
Kindergarten and Pre-Kindergarten Programs.....	36
A la Carte/Special Sales Service.....	36
A la Carte/Special Sales Service Provided by a Commercial Food Establishment .....	37
Self-Serve/Theme Bars .....	37
Family Style Meal Service.....	37
Procedures for Family Style Meals.....	38
Meal Accountability in Family Style Meal Service.....	38
Using the Offer versus Serve Provisions in Family Style Meal Service .....	38
Commercially Prepared Ready-to-Eat Foods .....	38

SFA Calendar of Monthly Due Dates ..... 40

## Background

This manual contains information for Residential Child Care Institutions (RCCIs) participating or that would like to participate in the National School Lunch Program (NSLP), and/or the School Breakfast Program (SBP), Afterschool Snack Program (ASP), or the Special Milk Program (SMP). Since numerous procedures are unique to RCCIs, we the Office of Health and Nutrition 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 South Carolina Department of Education (SCDE) Office of Health and Nutrition (OHN).

RCCIs are encouraged to contact the SA with your questions or for on-site technical assistance. As a participant in the program, please refer to the South Carolina Program Reference Manual located in the South Carolina Automated Payment System (SCAPS) to obtain further details and assistance.

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

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

*To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:*

- 1. mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;*
- 2. fax: (202) 690-7442; or*
- 3. email: [program.intake@usda.gov](mailto:program.intake@usda.gov).*

*This institution is an equal opportunity provider.*

### **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 are 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 Federal Codes and 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.

#### **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**

<b>ADA</b>	-	Americans with Disabilities Act
<b>ADP</b>	-	Average Daily Participation
<b>AR</b>	-	Administrative Review
<b>ASP</b>	-	Afterschool Snack Program
<b>BOM</b>	-	Beginning of Month
<b>CFR</b>	-	Code of Federal Regulations
<b>CAP</b>	-	Corrective Action Plan
<b>CN</b>	-	Child Nutrition
<b>CEP</b>	-	Community Eligibility Provision
<b>CNP</b>	-	Child Nutrition Program
<b>DC</b>	-	Direct Certification
<b>DGA</b>	-	Dietary Guidelines for Americans
<b>DHEC</b>	-	(South Carolina) Department of Health and Environmental Control
<b>DSS</b>	-	(South Carolina) Department of Social Services
<b>EOM</b>	-	End of Month
<b>FAAN</b>	-	Food Allergy and Anaphylaxis Network
<b>FDA</b>	-	Food and Drug Administration
<b>FDP</b>	-	Food Distribution (Commodity) Program
<b>FDPIR</b>	-	Food Distribution Program on Indian Reservations
<b>FFVP</b>	-	Fresh Fruit and Vegetable Program
<b>FNS</b>	-	(USDA) Food and Nutrition Service
<b>FSMC</b>	-	Food Service Management Company
<b>G/B</b>	-	Grain/Bread
<b>GED</b>	-	General Educational Development
<b>HACCP</b>	-	Hazard Analysis and Critical Control Point
<b>HHFKA</b>	-	Healthy, Hunger-Free Kids Act of 2010
<b>IDEA</b>	-	Individual with Disabilities Education Act
<b>IEP</b>	-	Individualized Education Program
<b>IFB</b>	-	Invitation for Bid
<b>ISS</b>	-	In-School Suspension
<b>LEA</b>	-	Local Education Agency
<b>LEP</b>	-	Limited English Proficiency
<b>LWP</b>	-	Local Wellness Policy
<b>M/MA</b>	-	Meat/Meat Alternate
<b>NAC</b>	-	Nutrition Advisory Council
<b>NNDCNP</b>	-	National Nutrient Database for Child Nutrition Programs
<b>NFSMI/ICN</b>	-	National Food Service Management Institute NOW Institute for Child Nutrition
<b>NSLA</b>	-	National School Lunch Act
<b>NSLP</b>	-	National School Lunch Program
<b>OVS</b>	-	Offer versus Serve
<b>PIN</b>	-	Personal Identification Number
<b>PLE</b>	-	Paid Lunch Equity
<b>POS</b>	-	Point-of-Service
<b>PR</b>	-	Production Record
<b>PS</b>	-	Performance Standards

<b>PTA</b>	-	Parent Teacher Association
<b>PTO</b>	-	Parent Teacher Organization
<b>RCCI</b>	-	Residential Child Care Institute
<b>RDA</b>	-	Recommended Dietary Allowances
<b>RDI</b>	-	Reference Daily Intake
<b>RFP</b>	-	Request for Proposal
<b>SA</b>	-	State Agency
<b>SBP</b>	-	School Breakfast Program
<b>SCAPS</b>	-	South Carolina Automated Payment System
<b>SCDE</b>	-	South Carolina Department of Education
<b>SFA</b>	-	School Food Authority
<b>SFS</b>	-	School Food Service
<b>SFSP</b>	-	Summer Food Service Program
<b>SIFT</b>	-	Summer Institute for Foodservice Training
<b>SMP</b>	-	Special Milk Program
<b>SNA</b>	-	School Nutrition Association
<b>SNAP</b>	-	Supplemental Nutrition Assistance Program (a.k.a. Food Stamps)
<b>SNASC</b>	-	School Nutrition Association of South Carolina
<b>SNB</b>	-	Severe Need Breakfast
<b>SSO</b>	-	Seamless Summer Option
<b>SY</b>	-	School Year
<b>TA</b>	-	Technical Assistance
<b>TANF</b>	-	Temporary Assistance for Needy Families
<b>TN</b>	-	Team Nutrition
<b>USDA</b>	-	United States Department of Agriculture
<b>V/F</b>	-	Vegetable/Fruit
<b>WIC</b>	-	Women, Infants and Children Program

### **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 disabled, 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 and maintain sponsorship of the NSLP and SBP an RCCI must request and maintain an agreement with the SA. 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 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.*

### **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, unless all students are provided free meals.

### **Food Safety**

The South Carolina Department of Health and Environmental Control (SCDHEC) requires that all Food Service Directors, including New Food Service Directors, be food safety certified but does not require food safety certification/licensed for staff on site, although, it is strongly encouraged that staff members take advantage of food safety requirements. SCDE offers courses to assist in this area.

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 must be posted in a public place.

Additionally, all RCCIs are required to create and implement a food safety plan. The food safety plan must contain, at a minimum, the process approaches for all menu items, Standard Operating Procedures covering food service and operational aspects of the program, and methods for monitoring and evaluating food safety. The food safety plan should regularly be reviewed and revised by all food service staff. Please refer to the Hazardous Analysis of Critical Control Points (HACCP) documents located in SCAPS for more detail.

### **Wellness Policy**

All RCCIs that participate in the National School Lunch and School Breakfast Programs are required to meet expanded local school wellness policy requirements consistent with the requirements set forth in section 204 of the Healthy, Hunger-Free Kids Act of 2010. The final rule requires each local educational agency to establish minimum content requirements for the local wellness policies, ensure stakeholder participation in the development and updates of such policies, and periodically assess and disclose to the compliance with the local wellness policies. These regulations are expected to result in local wellness policies that strengthen the ability of a local educational agency to create a nutrition environment that promotes students' health, well-being, and ability to learn. Additionally, these regulations will increase transparency for the public with regard to wellness policies and contribute to integrity in the nutrition program. Included in the Wellness Policy is a set of goals for nutrition education, physical activity, campus food provision, and other activities designed to promote student wellness.

## 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:

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

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

*To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:*

- 1. mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;*
- 2. fax: (202) 690-7442; or*
- 3. email: [program.intake@usda.gov](mailto:program.intake@usda.gov).*

*This institution is an equal opportunity provider.*

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.

State agencies may approve exemptions allowing separation by gender during a Child Nutrition Program meal service for participating SFAs, organizations, and institutions, without express prior approval from FNS, in the following circumstances:

- Meal service at religious institutions operating under the dictates of the religion with which they are affiliated.
- Meal service at juvenile correctional facilities where combining members of the opposite gender would present a potential safety risk.

- Meal service at facilities that fully separate by gender as part of their normal operations (for example, gender-separated summer camps).

The RCCI must notify the assigned education associate to inquire about an exemption form. When requesting an exemption, the Child Nutrition Program operator must specify which of the above listed reasons apply and why separation by gender is necessary. State agencies must document all exemption requests, including the date of approval or disapproval, and if applicable, the duration of the approval.

On a case by case basis, situations that do not clearly fit into any of the exemptions outlined above may be considered by the State agency in direct consultation with the FNS Regional Office, including the FNS Civil Rights Office and appropriate FNS National Office Child Nutrition Program staff.

### **Additional Required Information**

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 the SA. RCCIs must also have a written complaint procedure, complaint log, and complaint form. To obtain a complaint form, please refer to the South Carolina Program Reference Manual, Chapter 4, located in SCAPS.

At least one person must take the online Civil Rights Training (inTeam module) annually and in turn provide the training to the food service employees. For more information, please contact your assigned Education Associate.

### **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 towards making its facilities accessible.

### **On-Site Reviews**

All sponsors with multiple buildings are required to complete an on-site review for every building before February 1<sup>st</sup>. An on-site review is the evaluation of the lunch and breakfast counting and claiming procedures. Single Residential Child Care Institutions (RCCI) sites/building are not required to complete on-site reviews. Sponsors with two different sites listed in SCAPS but serve meals in the same cafeteria are not required to conduct an on-site review. However, single site sponsors are highly encouraged to conduct an annual on-site

review to ensure integrity and accountability of the Child Nutrition Programs. The On-Site Review Form 12-A is located in the Forms Sections of the South Carolina Program Reference Manual and located in SCAPS.

### **Free and Reduced Price Eligibility**

Once an RCCI has been approved to operate the National School Lunch (NSLP) and School Breakfast Program (SBP), it is necessary to establish the eligibility of the children participating in 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 NSLP and SBP. The eligibility requirements of residential students are determined differently from 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.

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. The eligibility roster must contain the following information:
- child's name;
  - date of eligibility determination;

- category of eligibility; and
- approving official's signature/initials

### **Day Students Attending RCCIs**

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 the 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 day students that were not already approved for benefits in the current program year, a prototype free and reduced applications which contains all required language and instructions, as well as the required parent letter, can be obtained from the office or you may contact the SA for assistance.

Applications must be distributed to households each program year because eligibility from the previous school year expires by the 30th operating day of the program. 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 submit a thorough Verification Summary Report.

Resources that will help with the Free and Reduced Process are the following:

- Eligibility Manual for School Meals
- Income Guidelines

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.

**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 in the correct format; 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.

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.

**RCCI Resident Attending Day School**

Residents that go to another school do not automatically qualify for benefits, unless the school has found them in the Direct Certification system. An application must be completed for each child unless the RCCI uses an eligibility documentation sheet for all children residing in the RCCI.

A complete application for an institutionalized child must include:

- a. child's name;
- b. 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 documentation sheet must be signed by an appropriate official and must include (example provided at the end of this document):

- a. child's name;
- b. any personal income received by the child;
- c. child's date of birth;
- d. date of admission;
- e. date of release;
- f. official's signature

**Verification**

Unless an RCCI processes and approves free and reduced applications for day students, RCCIs are exempt from verification efforts.

### **Verification Summary Report (VSR)**

All RCCIs are required to complete the VSR, even those that do not process any applications.

### **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. If an institution primarily serve and care 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 education associate for more details.

**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 National School Lunch Program (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. Meal Pattern Requirements are available online for School Lunch, School Breakfast, and the After School Snack Program. These charts list the food components, minimum quantities required, and the nutrient limitations (calories, saturated fat, and sodium) by grade groups, for complete, reimbursable meals.

#### **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 may be 7 or 5 days.

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

- Meat/Meat Alternate (chicken, beef, cheese, peanut butter, yogurt, nuts, seeds, etc.)
- Vegetable (red/orange, dark green, bean/pea (legume), starchy, and other)
- Fruit (fresh, canned, frozen, dried, and 100% juice)
- Grains/Bread (whole grain rich bread, buns, pizza crust, bagels, tortilla chips, muffins, waffles, pasta, etc.)
- Fluid Milk (1% or fat free plain and fat free flavored, only)

<b>Sample Lunch Menu</b>	<b>Food Item</b>	<b>Food Component</b>
Turkey Sandwich	Turkey	Meat/Meat Alternate
	Whole Grain Bread	Grain
Tossed Salad	Lettuce, Tomatoes, and Carrots	Vegetable
Diced Peaches	Peaches	Fruit
Choice of Milk	1% Plain Milk	Milk



**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)
- Fluid Milk (1% or fat free plain and fat free flavored, only)

Sample Breakfast Menu	Food Item	Food Component
Sausage Biscuit Sandwich	Sausage	Grain (Meat/Meat Alternate)
	Biscuit	Grain
Fresh Apple	Apple	Fruit
Choice of Milk	FF Chocolate 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. **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. 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. 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 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. Those records then become a valuable planning tool, since you can use them to help estimate the amount of each item to prepare the next time it is served.

### **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. 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: After School Snack Program**

To be eligible for this program, the RCCI must offer educational 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.

Please refer to the *After School Snack Meal Pattern* for component and portion size 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. Guidance for Afterschool Snack Program has a dedicated chapter located in SCAPS, in the South Carolina Program Reference Manual.

### **Questions about Menu Planning**

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

A: SFAs are required to provide reasonable modifications to students who have a medical need/disability/impairment. A "reasonable modification" is a change or alteration in policies, practices, and/or procedures to accommodate a participating child's disability. Reasonable modifications to effectively accommodate children with disabilities must be made on a case-by-

case basis. However, it is up to the SFA to determine if they will offer substitutes for students due to religious or lifestyle choices.

**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. Additionally, children must still have the option between two types of milk. This does not mean you must provide equal sized pitchers, but the child must have the option to have the other milk option if they choose.

**Q: Can RCCIs 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.

### **Smart Snacks**

The Healthy, Hunger-Free Kids Act of 2010 required sponsors operating the School Nutrition Programs to implement Smart Snacks standards beginning July 1, 2014. This rule states that all food/beverages sold on a school's campus, during a school day are required to meet particular nutrient standards. This rule does not include the food claimed for reimbursable meals for the School Breakfast Program, National School Lunch Program, or the After School Snack Program. These standards apply to food and beverages sold to students in the cafeteria as a la carte/seconds, in stores/snack bars, in vending machines, through culinary education programs, or any other venues selling to students during the school day on campus.

These standards do not apply to food brought to the facility in bagged lunches or for birthday parties and special events, sold after 30 minutes once school is over, sold with the intent to consume after school, or sold to adults only.

**Smart Snack Definitions:**

RCCI Campus – All areas of the property under the jurisdiction of the school that are accessible to students during the school day.

School Day – The period from midnight the day before to 30 minutes after the end of the official school day.

All non-exempt food and beverages that will be sold to students during the school day must be entered into the Alliance for a Healthier Generation Product Calculator. RCCIs must print off

the product calculator results and keep these on file. Any food or beverage sales that receive a fundraiser exemption must be documented and kept on file.

### **Food Distribution Program**

#### **Eligibility for USDA Foods**

Each year, SFAs 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 SFAs are not eligible for USDA Foods (previously known as commodities) until they have participated in the NSLP for one school year. Those SFAs who receive “vended” or catered meals are not eligible to receive USDA Foods.

USDA Foods are purchased by the government to improve the nutritional status of children and offered to schools based on their NSLP participation. USDA Foods accounts for up to 20% of the food budget. Using these dollars help decrease the amount of food that has to be purchased commercially.

For more information regarding the **Food Distribution Program**, please contact:

#### **Mr. Phil Truesdale**

Education Associate  
South Carolina Department of Education  
Office of Health and Nutrition  
1429 Senate Street  
Columbia, SC 29201  
Phone: 803-734-8209  
[PTruesdale@ed.sc.gov](mailto:PTruesdale@ed.sc.gov)  
Fax: 803-737-4148

#### **Ms. Karen Bailey**

Program Assistant  
South Carolina Department of Education  
Office of Health & Nutrition  
1249 Senate Street  
Columbia, SC 29201  
[kfbailey@ed.sc.gov](mailto:kfbailey@ed.sc.gov)  
PH: 803-734-4619  
FAX: 803-737-4148

### **Procurement**

Federal regulations require schools receiving Federal School Nutrition funds to follow certain rules for procurement. There are different requirements for large purchases and small purchases. Regulations must be followed for any purchases made using Child Nutrition funds. Refer to the South Carolina Program Reference Manual located in SCAPS for more details.

For more information regarding **Procurement**, please contact:

**Mr. Josh Kixmiller**

Education Associate

South Carolina Department of Education

Office of Health and Nutrition

[jkixmiller@ed.sc.gov](mailto:jkixmiller@ed.sc.gov)

Office Phone: 803-734-4468

Cell Phone: 803-509-3976

Fax: 803-737-4148

## **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. 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.

<b>Cash and Cash Like Records</b>	<b>Examples</b>
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

### **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. 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 your *education associate* for further instruction.

### **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.

### **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. Also, all food service personnel must be adequately trained before starting any child nutrition program.

The essential components of a good counting and claiming system are the point of service meal count, 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. 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
- Meals provided by families or communities that do not meet the meal pattern

<b>Reimbursable Meal</b>	<b>Weekends</b>	<b>Summer</b>	<b>Regular Week</b>	<b>Periods/Holidays</b>
<b>Breakfast</b>	Allowed to claim	Allowed to claim	Allowed to claim	Allowed to claim
<b>Lunch</b>	Allowed to claim	Allowed to claim	Allowed to claim	Allowed to claim
<b>Afterschool Snack</b>	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 attendance factor for RCCI is considered to be 100 percent, because students reside in the facility and would not be "absent."

**Monitoring** - Each 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. 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. The on-site review is downloadable in SCAPS.

### **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.

### **Reimbursement Claim**

School meal counts, by category, are submitted to the SFA level on a daily, weekly, or monthly basis. The counts from all schools are combined to generate a monthly claim for reimbursement. This is called consolidating the claim. After the claims are consolidated, they are submitted by the SFA to SCDE. SCDE is responsible for paying the SFA for reimbursable meals claimed as served by category during the claiming period (*South Carolina Program Manual, Chapter 12, page 12-5*).

Reimbursement rates are different for each category of meal benefit (free, reduced-price and paid) and for each type of meal served (breakfast, lunch, snack). Thus accurately counting, recording, and consolidating the number of meals served by category is the only way a claim for reimbursement can be properly submitted and the SFA be correctly paid for the meals served. 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 each child. Each cashier or monitor must be capable of correctly identifying students' food selections that comprise reimbursable meals.

### **Technical Assistance**

Each area of the state of South Carolina has an assigned Education Associate (EA) to assist SFAs in all aspects of program compliance. Your Education Associate is available to assist you in menu planning, determining eligibility status, production records, as well as general program compliance. SFAs are highly encouraged to get to know their Education Associate and use them as resource in your Child Nutrition Program planning. You may contact your Education Associate directly or call the Office of Health and Nutrition at (803) 734-8818 if you are unsure who is assigned to your area.

### **State Agency Compliance Reviews**

**Administrative Review**

USDA requires the State Agency (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. SFAs are expected to daily maintain all documentation required for federal compliance.

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
- 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 (all line items may not be applicable):**

#### **General Program Operations**

- Current approved SCDE-SFA Program Agreement
- Operating calendar for the current school year
- Serving times for breakfast, lunch, and afterschool snacks
- SFA annual onsite monitoring forms for all reviewed schools/sites
- SFA afterschool snack program monitoring forms for all reviewed schools/sites
- Record retention process
- Professional Standard staff training tracking method
- Charge Policy
- Documentation of outreach efforts for breakfast and summer feeding programs
- Student and parent involvement records for all reviewed schools/sites
- Driving directions to SFA office and all reviewed schools/sites

#### **Free and Reduced Eligibility**

- Current year applications and a blank copy of the application packet given to parents
- Current year Direct Certification lists can be obtained by and all local documentation for other children identified as being in SNAP/TANF households
- Current year certified list of McKinney-Vento eligible homeless and runaway students
- Current year certified list of Migrant Education Program (MEP) eligible students
- Community Eligibility Provision (CEP) source documentation to support ISP data
- Benefit issuance document (roster) for all reviewed school/sites for the review month
- Most current FNS-742 Verification Summary, to include all supporting documentation

#### **Meal Counting and Claiming**

- Source documents supporting the SFA's total reimbursement claim for the review month
- Edit check reports for review month at all reviewed schools/sites
- Source documents for meal counts at reviewed schools during the onsite visitation

### **Resource Management**

- Financial records and source documents related to child nutrition program operations
- Cash management records for all reviewed schools/sites, to include daily cash reconciliations, deposit slips, bank statements, and general ledger postings for the review month
- USDA Paid Lunch Equity tool, if applicable
- Excessive operating balance plan
- USDA Non-Program Revenue Tool, if applicable

### **Civil Rights**

- Discrimination complaint procedures for students and parents
- Discrimination complaints related to child nutrition program activities within the last 3 years and the current school year
- Process for accommodating students with special dietary needs
- Appropriate use of USDA non-discrimination statement on all child nutrition program materials, parental notification letters, and website content
- Annual training records for child nutrition program staff on civil rights requirements and complaint procedures, to include sign-in sheet and agenda
- Appropriate use of foreign language translations of program materials
- Appropriate use of the "...And Justice for All" poster in serving areas
- Documentation showing the racial/ethnic data is collected (for non-PowerSchool users)

### **Menus, Meal Patterns, and Nutrient Analysis**

- Standardized recipes and production records for reviewed schools/sites for the review month, to include lunch, breakfast, afterschool snacks, and fresh fruit and vegetable programs
- Nutrition fact sheets
- Six Cents Certification Worksheet and/or other nutrient analysis for the review week (if required as a result of finds in the offsite review component)
- Signage indicating what constitutes a reimbursable meal for breakfast and lunch
- Current year Offer vs. Serve policy and documentation of staff training

### **Wellness Policy and Competitive Foods**

- Current wellness policy with committee roster
- SFA and/or school competitive food policy affecting reviewed schools/sites
- Nutritional information for all competitive foods and beverages sold to students during the school day on the campuses of reviewed schools/sites, to include vending machines, canteens, and school stores
- Smart Snack exempt fundraiser checklists, summary reports, and waiver requests for all reviewed schools/sites

### **Professional Standards**

Professional Standards for child nutrition professionals is a key provision of the Healthy, Hunger Free Kids Act of 2010 (HHFKA). This rule requires a minimum amount of annual training hours for directors, managers, and staff. There are also minimum hiring standards for new Food Service Directors hired after July 1, 2015.

Hiring standards for new Food Service Directors are determined based on student enrollment per RCCI sponsor. Hiring standards have not been established for food service managers, cooks, line staff, cashiers, dishwashers, custodians, secretaries, etc. Food Service Directors hired before July 1, 2015 are grandfathered into their current position.

All Food Service Directors in the state of South Carolina must be food safety certified. For new Food Service Directors, at least eight hours of food safety training must be completed within five years prior to the starting date or completed within 30 days after the starting date.

The USDA Professional Standards rule sets training standards for all food service staff in the school nutrition programs. The title and designated job duties will determine how many annual professional standard hours that school food service staff must receive.

### **Questions about Professional Standards**

**Q. Please clarify the expectations for “temporary,” “substitute,” and “acting” staff positions and how the individuals in these situations are affected by training standards.**

A. Please see the policy for Professional Standards of Temporary, Substitute, and Acting Staff Positions policy found on the USDA Professional Standards website.

**Q. Is Offer versus Serve training required for RCCIs implementing offer versus serve?**

A. According to USDA’s Offer Versus Serve Manual, RCCIs implementing offer versus serve are expected to conduct training. It is up to the RCCI when and how they want to conduct offer versus serve training. RCCIs are also required to notify households about what is included in a reimbursable meal. This will help parents/guardians to reinforce nutrition education information at home and will help the students know how to select a reimbursable meal.

### Eligibility Roster (Sample)

[illegible]

**Approval Official's Signature:**\_\_\_\_\_

**Date:** \_\_\_\_\_

When a school offers more than one type of reimbursable meal 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  
¾ - 1 cup of vegetables  
½ - 1 cup of Fruit  
Milk

PB&J or Ham & Cheese Sandwich\*  
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 ½ cup fruit and/or vegetable. Students must select 3 of 4 items at breakfast, including ½ 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 prices 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 Chapter 30 – 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 about Meal Service**


**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 is selected by the student can a reimbursable meal is 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.

## SFA Calendar of Monthly Due Dates

 <h2>SFA Responsibilities</h2>	
May	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Complete HACCP SC Operations Assessment</li> <li>Attend Mandatory Area Meeting</li> </ul>
June	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Attend Summer Institute for Foodservice Training (SIFT)</li> <li>Complete Application Packet in SCAP 3 by June 15<sup>th</sup></li> </ul>
July	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Send letter to DHEC requesting two Food Safety Inspections</li> <li>Update HACCP/Food Safety Plan (if applicable)</li> <li>Complete Civil Rights Training</li> </ul>
August	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Complete on-site review of Afterschool Snack Program (ASP) within first four weeks of operation (if applicable)</li> <li>Determine eligibility of students for free/reduced-price benefits and notify households of eligibility status</li> <li>Provide Back-to-School staff development training</li> <li>Prepare for Administrative Review (if applicable)</li> </ul>
September	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Attend the Director/Supervisor Conference</li> </ul>
October	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Count all approved applications on file for verification by October 2<sup>nd</sup> (except for RCCIs and full CEP SFAs)</li> <li>Student count for Verification collected October 31<sup>st</sup> (except for RCCIs and full CEP SFAs)</li> <li>Complete Food Safety Inspection Report in SCAP 3 by October 13<sup>th</sup></li> <li>Attend the SNA conference</li> <li>Celebrate National School Lunch Week</li> </ul>
November	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Verification Process completed by November 15<sup>th</sup></li> </ul>
December	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Verification Report Due in SCAP 3 by December 1<sup>st</sup></li> </ul>
January	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Ensure Professional Standards are being met and training hours are being tracked</li> <li>SLP-4 report must be completed in SCAP 3 and emailed to Grants Accounting by January 31<sup>st</sup></li> </ul>
February	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Complete On-Site SFA Review of Counting and Claiming Procedures by February 1<sup>st</sup> (if applicable)</li> </ul>
March	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Complete Paid Lunch Equity Tool</li> <li>Celebrate National School Breakfast Week</li> <li>Celebrate National Nutrition Month</li> </ul>
April	<ul style="list-style-type: none"> <li>Submit monthly reimbursement claim in SCAP 3 by the 10<sup>th</sup> of the month</li> <li>Submit Identified Student &amp; Enrollment counts in SCAP 3 (except RCCIs)</li> </ul>
Other	<ul style="list-style-type: none"> <li>Complete Afterschool Snack Program on-site review twice a year. Conduct first review within four weeks of beginning operation (if applicable)</li> <li>Attend training offered by SCDE</li> <li>Continue providing update information for SFA points of contact in SCAPs and to assigned education associate</li> <li>Complete Wellness Policy Assessment</li> <li>Complete HACCP Monitoring Forms</li> </ul>
This institution is an equal opportunity provider.	