

# This Program Reference Manual...

is the **fourth** edition and is a publication of the Office of **Nutrition Programs**, South Carolina Department of Education. It is designed to provide information to assist local program administrators of **Child Nutrition Programs**. Questions and comments are always welcome and should be sent to:

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# Chapter 1 – Contacts

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### Office of Nutrition Programs

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Phone: 803-734-8188  
Fax: 803-737-4148  
Web Site: [www.ed.sc.gov](http://www.ed.sc.gov)

The Office of Nutrition Programs administers the following programs in South Carolina public schools, residential child care institutions (RCCIs), and in private and parochial schools with breakfast and lunch programs:

- Afterschool Snack Program (ASP)
- Food Distribution (Commodity) Program (FDP)
- Fresh Fruit and Vegetable Program (FFVP)
- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Summer Feeding Program (SFP)
- Seamless Summer Option (SSO)
- South Carolina Healthy Schools (SCHS)
- Special Milk Program (SMP)
- Summer Food Service Program (SFSP)
- Team Nutrition (TN)
- SC Farm to School Program (SCFSP)

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Marketing CNP – Best Practices /Meal Pricing/ Meal Service/ Food-Based Menu Planning/School Breakfast Program

Smart Snacks/SC SFS Purchasing Alliance/Purchasing Ethics/ Policy Agreements/ Confidentiality & Disclosure Eligibility

Food-Based Menu Planning/ Special Milk Program/Smart Snacks/Competitive Foods/Summer Nutrition Programs/School Breakfast Program

USDA Foods Program/ Purchasing Ethics

HACCP/Food Safety/ Food-Based Menu Planning/ School Breakfast Program/ Healthy School Environment & Wellness

Child Nutrition Programs Administrative Reviews/Food-Based Menu Planning/ Smart Snacks/Competitive Foods/ Special Dietary Needs/ School Breakfast/ Healthy School Environment & Wellness

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Child Nutrition Programs  
Administrative Reviews/  
Organization Administration/  
SFA Responsibilities/ Healthy  
School Environment &  
Wellness/ History/ Student  
Parent Involvement/ School  
Breakfast Program/Food  
Service Related Programs

Food-Based Menu  
Planning/ HACCP/Food  
Safety/ Production  
Records/ Civil Rights  
Compliance/ Ethics/ School  
Breakfast Program

Determining Eligibility/  
Verification/ Counting and  
Claiming/ Special Assistance  
Provisions/ School Breakfast  
Program/ Safety and  
Sanitation

Child Nutrition Programs  
Administrative Reviews/  
Verification/ Afterschool  
Snacks/Determining Eligibility/  
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Financial Management/  
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Marketing CNP – Best  
Practices /Meal Pricing/  
Meal Service/ Food-Based  
Menu Planning/School  
Breakfast Program

## Chapter 1 – Contacts

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Records/ Special Dietary  
Needs/ School Breakfast

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## Chapter 1 – Contacts

### Other Helpful Contacts

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Food and Nutrition Service  
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Atlanta, GA 30303-3427  
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#### **South Carolina Department of Health and Environmental Control (DHEC)**

Bureau of Environmental Health  
Division of Food Protection  
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Columbia, SC 29201  
Phone: 803-896-0640 or 803-896-0646  
Web Site: [www.scdhec.gov/health/envhlth/foodprotection](http://www.scdhec.gov/health/envhlth/foodprotection)

#### **South Carolina Department of Social Services (DSS)**

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**South Carolina**  
**School Food Service Program Reference Manual**  
Contributors: Keith Ringer & Lorrie Gregory  
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## Chapter 2 – Organization & Administration

The Office of Nutrition Programs, South Carolina Department of Education (SCDE) administers the following Child Nutrition Programs (CNPs) in South Carolina public and some charter schools, residential child care institutions (RCCIs), and in private and parochial schools with breakfast and lunch programs:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Afterschool Snack Program (ASP)
- Special Milk Program (SMP)
- Summer Food Service Program (SFSP)
- Seamless Summer Option (SSO)
- Fresh Fruit and Vegetable Program (FFVP)
- Food Distribution (Commodity) Program (FDP)
- Team Nutrition (TN)

### Federal Level Responsibilities

At the federal level, the Food and Nutrition Service (FNS) of the U. S. Department of Agriculture (USDA) administers the CNPs. USDA is authorized to issue regulations for the operation of these programs. Federal funds are apportioned among the states to reimburse participating schools. SCDE has an agreement with FNS for the administration of these programs in South Carolina. FNS periodically issues regulations, reviews the programs to determine compliance with the federal-state agreement, provides technical assistance, assists with Administrative Review (AR) process, performs audits of SCDE records, and conducts Management Evaluations of SCDE activities.

The USDA Southeast Regional Office is located in Atlanta, Georgia. Refer to [Chapter 1 - Contacts](#) provides information on how to contact the USDA Regional Office.

### State Level Responsibilities

SCDE is the liaison between FNS, USDA and local CNP School Food Authorities (SFAs) in South Carolina. Through this partnership of federal, state and local SFAs, program services and benefits are delivered to school children. Employees of the Office of Nutrition Programs are directly accountable to SCDE.

SCDE receives federal rules and regulations governing the CNPs from USDA. SCDE passes this information on to each SFA through its designated Authorized Representative.

### Our Mission

The mission of the Office of Nutrition Programs, the largest food service program in the Palmetto State, is to support districts and schools in the adoption, implementation, and compliance with effective policies, practices, and programs that support student health and nutrition for optimum academic achievement and wellbeing.

## Chapter 2 – Organization & Administration

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The primary function of SCDE’s Office of Nutrition Programs team is to assist local CNP SFAs in operating their programs. SCDE provides SFAs with:

- Reimbursement for qualifying meals, snacks, and milk.
- Supervisory oversight through the program review process.
- Guidance through handbooks, publications and websites.
- Consultative services and technical assistance on program management and administration.
- Training for CNP personnel on everything from food production to kitchen design, nutrition and nutrition education to personnel management.
- Commodities through the Food Distribution Program.

### Local Level Responsibilities

The local governing body (i.e. board of education, etc.) is referred to as the Local Education Agency (LEA) or SFA and is responsible for administering the CNPs.

The SFA appoints an “Authorized Representative” who has responsibility for the program. The Authorized Representative must assure that the SFA is in compliance with the Program Agreement between the SFA and SCDE.

The requirements for operating the CNPs are outlined in the Program Agreement which is in Chapter 3 – Program Agreements of this *Program Reference Manual*.

The SFA’s responsibilities include:

- Implementing the free and reduced-price meal policy.
- Preparing and submitting the reimbursement claim.
- Hiring employees to plan, prepare, and serve meals.
- Supervising operation of the programs.

The success of CNPs is attributed to the dedicated efforts of local personnel.

## Overview of the Child Nutrition Programs

### National School Lunch Program (NSLP)

South Carolina SFAs that choose to take part in the NSLP receive reimbursement from USDA for each meal served to eligible students. In return, they must serve lunches that meet federal requirements, and offer free and reduced-price lunches to eligible students.

Regulations establish meal patterns and nutrition standards for the National School Lunch to align with the *Dietary Guidelines for Americans*. The meal pattern for the School Lunch Program increases the availability of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk in school meals; reduce the levels of sodium, saturated fat and *trans* fat in meals; and meet the nutrition needs of school children with appropriate calorie requirements for grades K-5, 6-8, and 9-12. These improvements to the school meal programs, largely based on recommendations made by the Institute of Medicine of the National Academies, are expected to enhance the diet and health of school children, and help mitigate the childhood obesity trend.

For more information about menus and the menu planning systems available, refer to Chapter 19 – Menu Planning Basics in this *Program Reference Manual*.

Any student enrolled in a participating school and in the building at the time of lunch service, may purchase a meal through the NSLP. Students from households with incomes at or below the 130 percent of the federal poverty level are eligible for free lunches. Those between 130 percent and 185 percent of the poverty level are eligible for reduced-price lunches, for which students can be charged no more than 40 cents. Students from households with incomes over 185 percent of the poverty level pay full price, though their lunches are still subsidized with federal and state funds. Local SFAs set their own prices for full price lunches, subject to minimum rates prescribed by USDA.

Public schools, charter schools and non-profit private and parochial schools of high school grade or under are eligible to participate in the NSLP. RCCIs are also eligible. In South Carolina, approximately 1,100 schools and RCCIs participate in the NSLP.

### **School Breakfast Program (SBP)**

Over 150,000 students in South Carolina start each day with a nutritious school breakfast. Eighty-five percent of these meals are served free or at a reduced price. All public schools in South Carolina participate in the SBP because of a joint resolution passed by the South Carolina General Assembly in 1992 requiring schools to implement the SBP by the 1993-1994 school year.

The SBP is a federal program that provides states with cash assistance for non-profit breakfast programs in schools and RCCIs. Participating schools and institutions must serve breakfasts that meet federal nutrition standards and must provide free and reduced-price breakfasts to eligible children. The same Income Eligibility Guidelines apply for the SBP as were described in the previous section for the NSLP. Schools that serve a high percentage of lunches to students eligible for free or reduced-price meals may be eligible for higher reimbursement through the Severe Need Breakfast reimbursement option.

Teachers have reported students are more alert and perform better in class if they eat breakfast. Studies support that conclusion. Recognizing the importance of a nutritious breakfast, USDA has actively promoted the SBP, and at the same time has made a commitment to improve the nutritional quality of all school meals. School breakfasts must meet the meal pattern and nutrition standards based on the latest *Dietary Guidelines for Americans*. The meal pattern for the School Breakfast Program provides more whole grains, offered zero grams of trans fat per portion and appropriate calories for grades K-5, 6-8, and 9-12. More fruit will be offered to students beginning SY 2014-15 and the first target for reduction of sodium.

For more information about the SBP, refer to [Chapter 24 - School Breakfast Program](#) in this *Program Reference Manual*.

### **Afterschool Snack Program (ASP)**

The ASP was first implemented in 1999 as a result of the 1998 reauthorization of the Child Nutrition Act. This program offers cash reimbursement to help schools serve snacks to children after their regular school day ends. Afterschool snacks give children a nutritional boost and draw them into supervised activities that are safe, fun, and filled with learning opportunities. To qualify for the reimbursement, the snacks must meet nutritional standards and must be served to students enrolled in afterschool programs that include an education or enrichment component.

For more information about the ASP, refer to [Chapter 25 - Afterschool Snack Program](#) in this *Program Reference Manual*.

### Special Milk Program (SMP)

The SMP provides milk to children attending schools and RCCIs who do not have the opportunity to participate in other federal CNP. The program reimburses schools for the milk they serve. The SMP is also available to children who attend “split session” classes (half day) and do not have breakfast or lunch offered to them.

For more information about the SMP, refer to [Chapter 29 - Food Service Related Programs](#) in this *Program Reference Manual*.

### Summer Food Service Program

The SFSP provides nutritious meals at no charge to low-income children during school vacations. Children between ages one and 18 and individuals over 18 who are mentally or physically disabled and who participate in a school program for the disabled, may receive meals through the SFSP.

SFSP sponsors are reimbursed for meals served at eligible sites such as schools, parks, playgrounds, churches, college campuses and/or community centers. SFSP food service sites may include the following:

- **Open** sites operate in geographical areas where school or U.S. Census data documents that at least half of the children are eligible for free or reduced-priced school meals. Meals are provided at no charge to any child in attendance at the open site.
- **Enrolled** sites provide meals only to children who are enrolled at the site in an activity program, such as a recreation program or the National Youth Sports Program (NYSP). In order to claim all meals served to children for reimbursement, at least 50 percent of the enrolled children must be eligible for free or reduced-price school meals. Meals are provided at no charge to any enrolled child in attendance at the approved enrolled site.
- **Residential Camps and Nonresidential Day Camps** provide meals to children who are enrolled in the camp program. Only the meals served to camp participants who are eligible for free or reduced-price school meals may be claimed for reimbursement. A nonresidential day camp must offer a continuous schedule of organized programming around meal service for enrolled children. Meals are provided at no charge to any eligible child in attendance at the site. Sponsors may charge non-eligible children a fee for meals. However, the eligibility status of any enrolled child cannot be overtly identifiable.
- **Migrant** sites operate for children of migrant workers, as certified by a migrant organization. If the site serves non-migrant children, the sponsor must certify that the site predominantly serves migrant children. Meals are provided at no charge to any child in attendance at the migrant site.

Participants at open or enrolled sites may receive either one or two of the following meal types: breakfast, lunch, supper or snack (either morning or afternoon). Lunch and supper may not be claimed for the same child on the same day. Residential and nonresidential day camps and migrant sites may claim up to three meals and/or snacks per day, including lunch and supper for the same child.

## Chapter 2 – Organization & Administration

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For more information about the SFSP, refer to [Chapter 26 - Summer Nutrition Programs](#) in this *Program Reference Manual*.

### Seamless Summer Option (SSO)

The SSO is similar in many ways to the SFSP. It provides nutritious meals at no charge to low-income children during school vacations. Children between ages one and 18 and individuals over 18 who are mentally or physically disabled and who participate in a school program for the disabled, may receive meals through the SSO. For a brief description of eligible sites, refer to the previous section on SFSP.

The main differences between the SFSP and the SSO is that the SSO allows SFAs to continue the operation of the SBP and the NSLP, which includes the ASP, into vacation months and meals are reimbursed at the free SBP and NSLP rates.

For more information about the SSO, refer to [Chapter 26 - Summer Nutrition Programs](#) in this *Program Reference Manual*.

### Fresh Fruit and Vegetable Program (FFVP)

The FFVP started as a pilot project in four states and an Indian Tribal Organization in 2002. In 2008 the National School Lunch Act was amended making it a permanent law and the FFVP now operates in elementary schools in all 50 states, the District of Columbia, Guam, Puerto Rico, and the Virgin Islands. Participating elementary schools receive funding for the cost to make fresh fruits and vegetables available throughout the school day, at one or more locations within the school, outside of breakfast and lunch times. This allows students to sample fresh fruits and vegetables that they would not otherwise be exposed to or acquire a taste for. It also improves their current health and teaches them to make healthier lifelong eating habits. In order to be eligible for participation in the FFVP, at least 50 percent of the school's students must be eligible for free or reduced-price meals. Interested schools must submit an application to SCDE.

For more information about the FFVP, refer to [Chapter 27 – Fresh Fruit and Vegetable Program](#) in this *Program Reference Manual*.

### Food Distribution Program (FDP)

The FDP has traditionally been a method of disposing of surplus and price-supported agricultural commodities in order to prevent waste, while at the same time improving the diets of children, low-income persons, and others in need of food assistance. USDA is authorized to purchase domestic agricultural products, almost 60 percent of which must be determined to be in surplus at the time of the purchase, which they then provide to schools and other qualifying organizations with needy participants. All public schools, private schools and RCCIs in South Carolina are among the many recipients of USDA donated foods. Schools receive commodity foods at a specific value (.2325 cents for the 2013-14 school year) for each lunch served. At this time, commodity foods may be served in the SBP but USDA only provides entitlement funds for commodity foods served in the NSLP and SFSP. SFSP that prepare meals on site receive 1.5 cents per meal in commodity entitlement. Commodities purchased by USDA for use in the NSLP and in the SFSP may include meat, poultry, fish, fruits, vegetables, dairy, grain products, vegetable oil, shortening, and peanut products. Bonus commodities, a surplus of products in addition to entitlement commodities, are also occasionally available. These are offered to states on a fair-share basis and do not count

## Chapter 2 – Organization & Administration

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against a state's entitlement dollars. Previous bonus commodities have included frozen Freestone peaches and canned sweet potatoes.

For more information about the FDP, refer to Chapter 28 - Food Distribution Program in this *Program Reference Manual*.

### **Team Nutrition (TN)**

TN is USDA's school-based program that encourages children to make healthy food choices and to be physically active. Team Nutrition has four messages:

- Eat a variety of foods.
- Eat more fruits, vegetables and grains.
- Eat lower fat foods more often.
- Be physically active.

USDA established Team Nutrition with the mission of improving the health and education of children by creating innovative public and private partnerships that promote food choices for a healthy diet through the media, schools, families and the community. Team Nutrition's goal is to improve children's lifelong eating and physical activity habits by using the principles of the Dietary Guidelines for Americans and the Food Guide Pyramid.

Team Nutrition is implemented through three behavior-oriented strategies providing:

1. Training and technical assistance for Child Nutrition food service professionals to help them serve meals that look good, taste good and meet nutrition standards.
2. Multifaceted, integrated nutrition education for children and their parents to build skills and motivation to make healthful food and physical activity choices as part of healthy lifestyles.
3. Support for healthy eating and physical activity by involving school administrators and other school and community partners.

### Calendar of SFA Responsibilities

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- May**
- Conduct pre-operational visit of all Summer Food Service Program (SFSP) sites (if applicable).
  - Complete SC Operations Assessment per HACCP procedures.
  - Appoint Authorized Representative, Hearing, Determining, and Verifying Officials for new school year.
  - Conduct review at all SSO sites at least once during operation (if applicable).
  - Complete Program Agreements in SCAPS for all feeding sites and district offices points of contact by June 10.
  - Establish prices for meals and milk.
  - Mandatory Area Meetings conducted by assigned State Office Liaison.
- 

- Jun**
- Attend Summer Institute for Foodservice Training (SIFT).
  - Conduct review at all SFSP sites within first four weeks of operation (if applicable).
  - Conduct review at all Seamless Summer Option (SSO) sites at least once during operation (if applicable).
  - Complete Program Agreements in SCAPS by June 10.
- 

- Jul**
- Submit SLP Financial report to the SA
  - Update HACCP/Food Safety Plan
  - Complete the Excessive Operating Balance form (if applicable).
  - Confirm prices for meals and milk as established according to USDA guidelines.
  - Print “Free and Reduced-Price School Meals Application” and “Parent/Guardian Letter”. Get SCDE approval for any alternative, scanner, or internet application templates.
  - Submit Revenues and Expenses (for January 1 to June 30) to SCDE on SCAPS by July 31.
- 

- Aug**
- Distribute “Free and Reduced-Price School Meals Application” and “Parent/Guardian Letter” to all enrolled students (no earlier than four calendar weeks before the start of school).
  - Determine eligibility of students for free/reduced-price benefits and notify households of eligibility status.
  - Input annual revenue and expenditures in SCAPS for prior fiscal year.
  - Provide Back-to-School staff development training.
- 

- Sep**
- Complete on-site review of Afterschool Snack Program (ASP) within first four weeks of operation (if applicable).
  - Prepare for Administrative Review (if applicable)
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
- 

- Oct**
- Count all approved applications on file for verification on October 1.
  - Begin verification of free/reduced-price eligibility (if not already begun).
  - Celebrate National School Lunch Week.
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
-

## Chapter 2 – Organization & Administration

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### Calendar of SFA Responsibilities continued

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- Dec**
- Begin on-site accountability reviews (if applicable).
  - Begin on-site Food Service Management Company (FSMC) reviews (if applicable).
  - Use SCAPS to update Annual Financial Status Summary for prior fiscal year to SCDE by December 31.
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
  - Submit SLP Financial report to the SA once external auditors has completed the financial review of SFA food service account.
- 

- Jan**
- If considering hiring a FSMC, start the process no later than January 1.
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
  - Submit Revenues and Expenses (for July 1 to December 31) to SCDE on SCAPS by January 31.
- 

- Feb**
- Complete on-site accountability reviews for all attendance centers by February 1 (if applicable).
  - Complete FSMC monitoring reviews and submit to SCDE by February 1 (if applicable).
  - Submit applications for USDA's Best Practice Award by February 15 to SCDE (optional).
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
  - Submit Fresh Fruit and Vegetable Applications to SCDE (if eligible).
- 

- Mar**
- Submit the Verification Summary Report to SCDE by March 1.
  - Celebrate National School Breakfast Week.
  - Celebrate National Nutrition Month.
  - Receive SIFT training schedule from SCDE.
  - Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
- 

- Apr**
- Submit monthly reimbursement claim to SA by the 10<sup>th</sup> of the month.
  - Attend mandatory Seamless Summer Option Training.
  - Update SCAPS accounts to reflect SSO sites, if applicable.
- 

- Other**
- Submit reimbursement claims within 60 days of last day of month claimed.
  - Complete Afterschool Snack Program on-site review twice a year. Conduct first review within four weeks of beginning operation (if applicable).
  - Attend training offered by SCDE.
  - Continue providing update information for district points of contact.
-

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributors: Lorrie Gregory, Diane Gillie and Walter Caudle  
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# Chapter 3 – Policy Agreement

## Policy Agreement for Free and Reduced-Price Meals

The Policy Agreement outlines the procedures that a School Food Authority (SFA) will uniformly implement in determining student eligibility to receive the benefits of the National School Lunch Program (NSLP) and School Breakfast Programs (SBP). All school districts and other program sponsors participating in the NSLP and/or SBP must agree to furnish benefits of these programs to all students regardless of their ability to pay.

In fulfilling its responsibilities, the school district agrees:

- To serve meals free to children from households whose income is at or below the current eligibility income scale for free meals or whose families are recipients of Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance to Needy Families (TANF);
- To serve meals at a reduced price to children from households whose income is at or below the current eligibility income scale for reduced-price meals;
- To provide free meal benefits to foster children who meet the criteria as wards of the court or state welfare agency;
- That there will be no overt identification of any child receiving these benefits;
- That no child shall be discriminated against because of race, color, gender, disability, age, or national origin;
- To establish a fair hearing procedure;
- To designate both a reviewing official and a hearing official (they cannot be the same individual);
- To submit to the informational media, local employment offices, and major employers contemplating large layoffs, a public release containing the letter to parents, the eligibility criteria, and the application form;
- To establish and follow meal count and collection procedures that will not overtly identify those students receiving free and reduced-price meals; and
- To submit to the Office of Nutrition Programs, SCDE any proposed alterations, amendments, public announcements, etc. prior to implementation; such changes to be effective only upon approval.

The current Policy Agreement renewal and the most recently approved full Policy Agreement must be kept on file in the SFA and referred to at the beginning of each school year to assure compliance with its provisions. Copies of key attachments for the current school year must be given to each person processing meal applications for the SFA and to all staff responsible for implementing the free and reduced-price benefit requirements of the program.

# Chapter 3a – Application for Participation

As the state agency responsible for implementing the Child Nutrition Programs in South Carolina, the South Carolina Department of Education (SCDE) must develop and maintain current contracts with participating School Food Authorities (SFAs) including public school districts, charter schools, residential child care institutions (RCCIs), and private/parochial schools.

## **Application on the *South Carolina Automated Payment System (SCAPS)***

The annual SFA application process solicits specific information on each individual participating school or site for reporting purposes. This site profile data provides the basis for distribution of federal reimbursement funds to SFAs for meals served to students. Formerly a paper document listing all participating schools/sites, this information is now input on *SCAPS* at the beginning of each school year. The information includes meal count procedures, meal prices, and the intended meal planning system.

Once information is entered into *SCAPS*, the profile is rolled-over annually for each currently approved SFA. However, selected data must be reentered to trigger an annual approval. Information varies according to the type of SFA and whether a program is pricing, non-pricing, or both. For approval purposes, pricing programs must enter meal prices for students and adults and non-pricing programs such as group homes will have to provide numbers of estimated participants by eligibility category. Meal count procedures and other requested program information must be updated by the SFA in each site when changes occur. For assistance with entering and updating the application/profile information and data in *SCAPS*, contact the Office of Health and Nutrition, SCDE at (803) 734-8188.

## **Pricing versus Non-pricing Policy Agreement**

Depending on the SFA operating the school nutrition programs, the policy agreement will be considered either a pricing or a non-pricing document.

### **Pricing Programs**

Applications for meal benefits are issued to all students. Free and reduced-price meal benefit eligibility determinations are based on family income. Reporting of meals by categories – free, reduced-price and full-paid – are critical to claiming meals for federal reimbursement. Public schools and most private/parochial and charter schools are considered pricing programs.

### **Non-Pricing Programs**

The non-pricing policy applies to those operations that claim all meals for only free or only full-paid reimbursement rates. Non-profit residential child care institutions (RCCIs) and group homes normally complete and submit a non-pricing policy agreement as all children served in these programs receive free meals. Residential schools that charge tuition may participate in federally-funded school nutrition programs but are only allowed to claim meals in the full-paid category at the lowest reimbursement rates.

These types of non-pricing programs are not required to obtain or approve free and reduced-price meal applications. Documentation for claiming a single reimbursement rate is based on

## Chapter 3 – Policy Agreement

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enrollment data by student name, dates of residence, and non-profit status of the participating institution or school.

### **Dual Program Types**

In certain instances, SFAs may participate as both pricing and non-pricing policy programs. This normally occurs when a RCCI also serves day students and/or accepts private placements. In these specific instances, meal applications must be negotiated for these affected students in order to claim the appropriate category of meal eligibility -- free, reduced-price, or full paid -- for reimbursement.

### **Impact of Different Program Types**

The Policy Agreement and the required site profile information entered in SCAPS are impacted by these differences. SCAPS calls for different initial information depending on pricing or non-pricing status.

Prior to the beginning of each school year, SFAs are required to update their policy agreements in SCAPS. Once updated, the agreements will be approved by the Office of Nutrition Programs, SCDE. In the forms section of SCAPS are basic instructions for completion of the Policy Agreement and implementation of the program.

Prototype pricing and non-pricing Policy Agreements with basic critical attachments and instructions for completing and implementing are included in the forms section.

### Pricing Program Policy Agreement Contents

1. Instructions for the current SY's Free and Reduced-Price Meal Policy Agreement and Implementation Policy Provisions
2. Section I: Pricing Program Policy Agreement for Free and Reduced-Price Meals
  - Appendix A: Household Size and Income Guidelines (Effective July - June)
  - Appendix B: Parent/Guardian Letter
  - Appendix C: Free and Reduced-Price School Meals Family Application
  - Appendix D: Notification Letter
  - Appendix E: Public Media Release
  - Appendix F: Meal Count/Collection Procedure(s)
  - Appendix G: We Must Check Your Application Letter
  - Appendix H: We Have Checked Your Application Letter
  - Appendix I: Verification Roster
  - Appendix J: Notification of Predetermined Eligibility (Direct Certification)
3. Section II: Waiver of Confidentiality for Free and Reduced Price Meal Eligibility Disclosures
4. Section III: Direct Certification for Free Meal Benefits – Refer to Chapters 10 and 11 – Determining Eligibility and Verification of Eligibility in this Program Reference Manual for information and relevant prototype forms.
5. Section IV: Special Assistance Provisions 1, 2, and 3 – Refer to Chapter 10 – Special Assistance Provisions in this Program Reference Manual for information and relevant prototype forms.

### Non-Pricing Program Policy Agreement Contents

6. Non-Pricing Program Policy Agreement for Free and Reduced-Price Meals is completed in SCAPS.
7. Non-Pricing Program Attachment A: Meal Count Methods is completed in SCAPS.
8. Non-Pricing Program Attachment B: Meal Eligibility Documentation is completed in SCAPS.

## Chapter 3 – Policy Agreement

### INSTRUCTIONS FOR THE SCHOOL FOOD AUTHORITY FREE AND REDUCED PRICE MEAL POLICY AGREEMENT AND IMPLEMENTING POLICY PROVISIONS

Below you are given instructions for completing the basic forms and attachments pertaining to:

- ◆ (Section I) the Policy Agreement for free and reduced price meals;
- ◆ (Section II) the waiver of confidentiality;
- ◆ (Section III) direct certification; and
- ◆ (Section IV) Special Assistance Provisions 1, 2, and 3.

We are hopeful that the information provided will expedite the school food authority's submission and State approval of the Policy Agreement Renewal in SCAPS. A copy of the instructions should be retained locally for implementation, instruction and guidance on confidentiality, direct certification, and Provisions 1, 2, and 3 for determining eligibility and claiming meals. This along with any other documents pertaining to your policy agreement can be retrieved from your SCAPS profile for your assigned district or school and their sites.

#### SECTION I

Specific form identification and instructions for both completion and implementation of the Policy Agreement are as follows.

1. **BASIC POLICY AGREEMENT** - The basic policy consists of two major parts and contains supplemental agreements under which the district and/or school will operate its feeding programs.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** The SFA Application – This section contains the SFA information, SFA type (1), date for the operating SY (2), Superintendent or other Official information and address (3-13), CN Director's information (14-17), the information for the Claim's preparer (18-21), Finance Contact person (22-25), Hearing (26), determining (27), and verifying Officials (28), the meal count and collection procedures verification (29) and the eligibility information (30-33). There are small sections that only pertain to RCCIs ONLY (34-36); one that only pertain to Food Service Management companies (FSMC) (37-41) and Vended meals (42-45). Severe Need Lunch - Reimbursement Rate Determination is determined using a two year analysis of free and reduced meal counts. This information will be provided by finance in the state agency and is for your viewing information and no input is required. Comments from the SFA may be submitted at item 46. The application must be certified by placing a checkmark in the box once the statement has been read and agreed upon.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** Application for Fresh Fruit and Vegetable Program (FF&VP) – This section may only be completed if the SFA has applied for and been awarded the grant to operation the FF&V Program for a specific SY.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** Details for the Food Service Management Company (FSMC) – This section may only be completed if the SFA uses a management company to prepare its meals.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** Details for the Meal Pattern Compliance Dashboard – This section may vary from SY to SY. Instructions will not be included at this time.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** Details for the Checklist Summary- Any and all documents that are to be submitted to the State Agency (SA) must be downloaded into this section of SCAPS. You should be able to locate any forms you desire to submit or are required to submit in the forms sections of SCAPS.

**INSTRUCTIONS FOR COMPLETING APPLICATION PACKET:** Details for Application Packet Notes- This section is designed to provide the SFA or SA an area to record any pertinent communication for understanding between the two offices.

## Chapter 3 – Policy Agreement

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Once approved, copies of the Policy Agreement can be retrieved from the SFA profile in SCAPS. School food authorities are asked to make sufficient copies of the approved policy for distribution to each school/site unless they have access to SCAPS and can view via the Internet.

2. **APPENDIX A** - Appendix A provides the complete "Household Size and Income Guidelines for Free and Reduced Price Meals" to be used for determining eligibility each school year and will be available in SCAPS as soon as it is released by USDA.

INSTRUCTIONS FOR IMPLEMENTING: The "Household Size and Income Guidelines" provide the basic criteria for determining recipient eligibility. Therefore, it is imperative that approving officials use this scale when determining a student's eligibility.

4. **APPENDIX B** - Appendix B is the "Letter to Parent/Guardian" which is customized to accompany the household (multi-child) meal application prototype form. Federal regulations require that this letter or a similar one be sent to all parents or guardians of children attending public school in each district and in private and parochial, Charter schools and some residential child care institutions that may have day students and/or private placements that are operating a pricing program. The letter includes the income guide in the upper portion of the "Household Size and Income Guidelines" which must be sent home to each household.

INSTRUCTIONS FOR COMPLETING: When using this sample letter or a revised letter, the following instructions apply:

- a) Modify letter by deleting references to any programs that the school does not intend to operate.
- b) Complete blank spaces by filling in information appropriate for the school food authority. It is not necessary to submit a copy of this letter to the SA. However, in all cases, each school must complete the price charged information on its file copy. The same procedure as described above pertains to the approving official's signature.

For school food authorities that will develop their own letter the following instructions apply:

Develop letter and attach to basic policy. The State Office will determine acceptability of the letter's content. In no case should a school food authority transmit a revised letter to parents prior to State approval.

**Note to all pricing programs**--A "reduced price lunch" is a lunch costing no more than 40 cents to any student eligible for a reduced price meal as determined by the income guidelines; a "reduced price breakfast" is a breakfast costing no more than 30 cents to such students. **These prices for reduced price meals are established by Federal law and cannot be increased locally.**

INSTRUCTIONS FOR IMPLEMENTING: The "Letter to Parent/Guardian" must be sent home to each household at the beginning of the school year with a free and reduced price meal application form. Keep in mind that an application must be made available to every student in such a manner as to protect the needy students from overt identification.

5. **APPENDIX C** - Appendix C includes the household meal application form with instructions to be used by households when seeking approval for free or reduced price meals for their children. A multi-child or household application must be used. Individual application forms are no longer acceptable. School food authorities are requested to duplicate application forms sufficient to meet their needs. Appendix C represents 2 separate pages: one application form (a one-page household form) and one instruction sheet. **Other than the insertion of local points-of-contact, this form and instructions may not be altered or changed in any manner without written approval from the State Office.**

INSTRUCTIONS FOR COMPLETING: After thorough review of the application prototype, modify any areas that will ensure the lunch application is tailored to your SFA's personal profile. If any changes are made beyond the minor addition of the SFA name, address, point-

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of-contact and telephone information, a copy must be downloaded into the Checklist Summary of SCAPS for prior approval before disseminating throughout the district or area of operation. This requirement also applies to all scannable application templates and Internet-based application software. **If upon audit, it is determined that your district is using an unapproved lunch application, your district may be subject to reimbursement withholdings until the matter is rectified.**

**INSTRUCTIONS FOR IMPLEMENTING:** Approved application forms are the primary source from which federal reimbursement is granted. Therefore, it is of utmost importance that the procedures followed in implementing and approving applications be taken seriously and followed to the letter. If the following practices are adhered to, each school food authority should be assured of compliance with the application aspect of the free and reduced price policy agreement.

- a) The approving authority must review each application to ensure information is complete. All data requested, including data supplied by the approving authority, are considered pertinent and must be completed.
- b) Approval of each application must be based on:
  - household size and income guidelines prescribed by the Secretary of Agriculture or the provision of a SNAP/TANF case number (Medicaid and EBT numbers are **not** acceptable.),
  - household membership, current income by source for each household member,
  - last four digits of the social security number of the adult household member signing form or indicator of no SSN, if income is used to determine eligibility, and
  - parent or guardian signature on each application.
- c) Applications must be maintained in a central file at the SFA office. The applications must be arranged or in some manner to be readily retrievable for each participating school. The use of a household meal application requires a centralized number system for overall accountability for eligibility source documentation.
- d) A master list or a record system must be maintained for transfer students - such a list or record system must contain as a minimum, the date students entered or left school, the name of the school they transferred to or from, the date their application was approved and the category of eligibility (free or reduced). The application form includes a line item for entering withdrawal dates.

During the school year, schools have up to three operating days to affect benefit increases and ten days to have negative benefit changes in place.

All applications, both those approved and denied, must be kept on file for a period of three years following the school year in which they were approved or until audit resolution if an audit exception is taken.

Schools which (a) serve 80 percent needy and schools (b) which choose to serve all children free and pay the difference in costs from program funds or local revenues may, upon State approval, extend free and reduced price meal eligibility for a period of (a) two and (b) up to five years respectively based on applications filed the first year. See Section IV of this instruction/implementation document for specific discussion of the Special Assistance Provisions 1, 2, and 3.

6. **APPENDIX D** - Appendix D is a Notification of Eligibility Letter to be used by the approving authorities (SFA) to inform applicants as to eligibility status.

**INSTRUCTIONS FOR COMPLETING:** Complete blank spaces by filling in the appropriate information concerning the procedure for children to follow to receive meals and references to the hearing official. The hearing official must be an individual who is not involved with the approval or verification process.

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**INSTRUCTIONS FOR IMPLEMENTING:** Federal regulations require that each applicant receive a notice regarding eligibility determination. All action regarding eligibility determinations should be taken within ten (10) working days on all applications submitted. **In those cases where applications are denied, a copy of the eligibility determination sent to the household must be kept on file with the application and the reason for denial.**

Temporary approval of an application is no longer permitted because of the yearlong duration of eligibility. If the SFA is concerned with the authenticity of the information provided on an application, they may, on a case by case basis, verify the application for cause.

7. **APPENDIX E** - Appendix E is a sample public media release which is to be used by the school food authority when making public announcements regarding its Free and Reduced Price Policy.

**INSTRUCTIONS FOR COMPLETING:** Complete blank spaces by filling in information appropriate for the school food authority. Copies of any published articles or the release sent to newspapers must be submitted in SCAPS with the Policy Agreement in the Checklist Summary. **In addition, list all newspapers and/or publishers who were sent the release.**

**INSTRUCTIONS FOR IMPLEMENTING:** Regulations require that prior to or during the first week of school, a public release be made to the local news media, the unemployment office and any major employers who are contemplating layoffs within the SFA's attendance area. When sent to the news media, the letter to households, an application form and a complete income scale (free and reduced-price guidelines) or the same information put in a narrative form will constitute a public release.

The requirement is to **provide** the information described above to the news media. It is **not** the school food authority's responsibility to ensure that the information is published in the newspapers. **A copy of the information provided to the media and the letter of transmittal should be retained to serve as Appendix E of the Policy Agreement.** If the information is published, a copy of the published material should also be included as part of Appendix E. Copies of the public release must be made available upon request to any interested party. The public release **must** contain **both** the free and reduced-price income eligibility guidelines.

8. **APPENDIX F** – Appendix F provides a description of the meal count/collection procedure(s) and options used for breakfast and lunch in schools. In an effort to standardize meal count/collection procedures used throughout the state and to simplify the task of writing such procedures for school personnel, a checklist approach to completing Appendix F is used. With the new South Carolina Automated Payment System (SCAPS) implemented beginning with the 2012-2013 school year, this appendix is no longer used to capture the medium of exchange and meal count procedure for each site or school. This information must be coded in SCAPS by site during the completion of other profile information prior to program approval. Appendix F will still be the vehicle for obtaining the specifics on the collection of revenues, charging policies, procedures used to prevent overt identification, and point of service accountability. **Information needed on individual school site count procedures must be entered during the web-based application process wherein all sites intending to operate the school meal programs must be listed and certain key data provided in SCAPS prior to approval.**

**INSTRUCTIONS FOR COMPLETION:** It is imperative that the School Food Service Supervisor or Director meet with local school principals, cashiers, and other program personnel to fully interpret and explain collection and meal count procedures required for compliance with Federal regulations. The proper implementation of procedures for obtaining an accurate meal count by category at the point of service on a daily basis needs to be fully discussed. An early morning count is not sufficient unless confirmed for each student at the point of service.

**The meal count procedure indicated for an individual school or site in the application process must be the same as the procedure actually used. If a change must be**

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**made, a statement describing in detail such a procedure and signed by the SFA Superintendent or designee must be submitted to the State Office via SCAPS Checklist Summary for approval prior to the effective date of implementation.**

9. **APPENDIX G** – Notification of Selection for Verification for Eligibility – This notice/letter must be sent to any household selected for verification unless the verification is of categorical eligibility and is done through the county DSS office or another state agency. Students eligible free as a result of direct certification or categorical eligibility are not subject to verification.
10. **APPENDIX H** – Letter of Verification Results – This notice/letter must be sent to any household whose eligibility for meal benefits will be reduced or terminated due to verification. This notice/letter must be sent 10 calendar days before the change in benefits occurs.
11. **APPENDIX I** - Verification Roster – The roster is designed for a SFA to use to document all actions taken for each student selected for verification of eligibility. All actions taken as a result of verification must be maintained for audit, reporting, and review purposes. This form is a tool for collecting and summarizing this required information, prior to the completion of the FNS-742, Verification Summary Report.
12. **APPENDIX J** - Notice/Letter of Predetermined Eligibility – A prototype Notice/Letter of Predetermined Eligibility **must** be sent to any household certified as eligible for free meal benefits through direct certification. The names of household members appearing on the direct certification document for the school year should be entered on the letter and sent to the household prior to the first day of school, when possible. The purpose of direct certification is to provide for pre-approval of students for free meals based on their current eligibility for SNAP/TANF benefits and/or foster child status and thus eliminating the need for the completion of a meal application.

### SECTION II

#### **WAIVER OF CONFIDENTIALITY FOR FREE AND REDUCED PRICE MEAL ELIGIBILITY DISCLOSURES**

Although not as restrictive as in the past, rules of confidentiality still apply to the use of free and reduced-price eligibility information by student name. States and SFAs are currently allowed to use free and reduced price eligibility information in summary form for demonstrating economic need or for purposes of program funding. The restrictions apply when individual students are identified through lists, announcements, etc. as eligible for free and/or reduced-price meals. The meal application solicits information to determine eligibility for school meal benefits only and such documents (including direct certification listings) must be treated in a confidential manner.

To accommodate the need for free and reduced-price meal information on an individual basis, USDA established a waiver of confidentiality option which allows the household to grant permission for the use or disclosure of their child's (or children's) free or reduced price meal eligibility for other program purposes. **Sample waiver documents are included in this section.** As indicated on the suggested form, exact purpose and/or benefits must be clearly identified. Waivers may be included on the meal application; however, all required statements and disclaimers must be on the application or in the cover letter to the households. Specifically, households must be informed that:

- ◆ Signing the waiver is not a requirement or prerequisite to receiving meal benefits.
- ◆ Receipt of SNAP/TANF benefits will not be disclosed.
- ◆ The waiver will only be used for those programs or benefits agreed to by the household.

Agencies other than the SFA using eligibility information by student name must assure the SFA in writing that eligibility status information will be used for the stated purpose only. The district may want to administer the waiver process on an individual benefit or program basis rather than list various uses together on one waiver document.

The waiver of confidentiality only applies when free and/or reduced-price meal eligibility is used or released on an individual name basis. **Any summary use of free and reduced-price meal eligibility data is permissible without going through the waiver process.** USDA has formally authorized three exceptions to the waiver requirement: (1) names of students with his or her eligibility may be used without a waiver for National Assessment of Education Progress (standardized testing), (2) provided to officials collecting data for Title I allocation and evaluation purposes, and (3) shared with Medicaid and State Children's Health Insurance Program (SCHIP) officials and agencies with appropriate written agreements in place. A sample agreement and an exception form for sharing information with Medicaid and SCHIP officials are also included in this Section.

**WAIVER OF CONFIDENTIALITY**

The information that you provided on the free and reduced price meal application will be used to determine your child’s (or children’s) eligibility for free and reduced price meals. With your permission, this information may also be used to determine eligibility for the following benefit(s) as well.

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*(Please note that the SFA must identify those programs and agencies that will use the free and/or reduced price eligibility information, for what purpose and/or the benefit to be provided. It may be far easier to administer the waiver process on a programmatic or individual benefit basis rather than list various uses together on one waiver document. Agencies other than the SFA using the eligibility information by student name must assure the SFA in writing that eligibility status information will be used for the purpose stated only. **This paragraph is for information only and must be deleted from this form to be reproduced and used as a waiver document.**)*

Signing this waiver is not a requirement or prerequisite to receiving free and/or reduced price meal benefits.

In no event will receipt of SNAP/TANF benefits be indicated in the release of free meal eligibility to any entity.

By signing my name I understand and give permission to the school district to use the information on the meal application form or from the direct certification eligibility document for the purpose(s) listed above.

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*Signature of Parent or Legal Guardian*

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*Date*

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### SHARING INFORMATION WITH OTHER PROGRAMS

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Dear Parent/Guardian:

To save you time and effort, the information you gave on your Free and Reduced Price School Meals Application may be shared with other programs for which your children may qualify. **For the following programs, we must have your permission to share your information. Sending in this form will not change whether your children get free or reduced price meals.**

- 
- No, I **DO NOT** want information from my Free and Reduce Price School Meals Application shared with any of these programs.
- 
- Yes, I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.
- Yes, I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.
- Yes, I **DO** want school officials to share information from my Free and Reduced Price School Meals Application with **[name of program specific to your school]**.

If you checked yes to any or all of the boxes above, fill out the form below. Your information will be shared only with the programs you checked.

Child's Name:	School:	
Signature of Parent/Guardian:	Date:	
Printed Name:		
Address:		
City:	State:	Zip:

For more information, you may call **[name]** at **[phone]**.

Return this form to:

**[address]** by **[date]**

Sharing Information with Other Programs

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### DISCLOSURE OF FREE AND REDUCED PRICE INFORMATION AGREEMENT

#### I. PURPOSE AND SCOPE

\_\_\_\_\_ and \_\_\_\_\_ acknowledge and agree

(Insert name of determining agency)

(Insert name of receiving agency)

that children's free and reduced price meal and free milk eligibility information obtained under provisions of the National School Lunch Act (42 USC 1751 et. seq.) or Child Nutrition Act of 1966 (42 USC 1771 et. seq.) and the regulations implementing those Acts is confidential information. This Agreement is intended to ensure that any information disclosed by the \_\_\_\_\_ to the \_\_\_\_\_ about children eligible for

(Insert name of determining agency)

(Insert name of receiving agency)

free and reduced price meals of free milk will be used only for purposes specified in this Agreement and that the \_\_\_\_\_ and \_\_\_\_\_ recognize that there are

(Insert name of determining agency)

(Insert name of receiving agency)

penalties for unauthorized disclosures of this eligibility information.

#### II. AUTHORITY

Section 9(b)(2)(C)(iii) of the National School Lunch Act (42 USC 1758(b)(2)(C)(iii)) authorizes the limited disclosure of children's free and reduced price meal or free milk eligibility information to specific programs or individuals, without prior parent/guardian consent. Except that, the parent/guardian must be provided the opportunity to decline to share eligibility information prior to the disclosure for identifying children eligible for benefits under or enrolling children in the State Medicaid Program and the State children's health insurance program. Additionally, the statute specifies that for any disclosures not authorized by the statute, the consent of children's parents/guardians must be claimed to the disclosure.

The *requesting* agency certifies that it is currently authorized to administer the following program(s) and that the information requested will be used only for the program(s) indicated.

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Check all that apply    Program Information authorized

	<i>Medicaid or the State children's health insurance program (SCHIP) administered by a State or local agency authorized under titles XIX or XXI of the Social Security Act.</i> <b>Specify Program:</b>	All eligibility information, unless parents elect not to have information disclosed.
	<i>State health program other than Medicaid/SCHIP, administered by a State agency or local education agency.</i> <b>Specify Program:</b>	Eligibility status only, consent not required.
	<i>Federal health program other than Medicaid/SCHIP</i> <b>Specify Program:</b>	NO eligibility information, unless parental consent is obtained.
	<i>Local health program.</i> <b>Specify Program:</b>	NO eligibility information, unless parental consent is obtained.
	<i>Child Nutrition Program under the National School Lunch Act or Child Nutrition Act.</i> <b>Specify Program:</b>	All eligibility information, consent not required.
	<i>Federal/State or local means tested nutrition program with eligibility standards comparable to the National School Lunch Program.</i> <b>Specify Program:</b>	Eligibility status only, consent not required.
	<i>Federal education program.</i> <b>Specify Program:</b>	Eligibility status only, consent not required.
	<i>State education program administered by a State agency or local education agency.</i> <b>Specify Program:</b>	Eligibility status only, consent not required.
	<i>Local education program.</i> <b>Specify Program:</b>	No eligibility information, unless parental consent is obtained.

**Note:** Section 9(b)(2)(C)(iv) specifies that certain programs may receive children's eligibility status **only**, without parental consent. Parental consent must be obtained to disclose any additional eligibility information. Section 9(b)(2)(C)(iv) specifies that for State Medicaid or SCHIP, parents must be notified and given opportunity to elect not to have information disclosed.

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### III. RESPONSIBILITIES

\_\_\_\_\_ will:  
(Insert Name of Determining Agency)

When required, secure parents/guardians consent prior to any disclosure not authorized by the National School Lunch Act or any regulations under that Act, unless prior consent is secured by the receiving agency and made available to the determining agency;

For State Medicaid and SCHIP notify parents/guardians of potential disclosures and provide opportunity for parents/guardians to elect not to have information disclosed;

Disclose eligibility information only to persons directly connected to the administration or enforcement of programs authorized access under the National School Lunch Act or regulations under the Act or to programs or services for which parents/guardians gave consent.

\_\_\_\_\_ will:  
(Insert Name of Receiving Agency)

Ensure that only persons who are directly connected with the administration or enforcement of the \_\_\_\_\_ and whose job responsibilities require  
(Insert Name of the Program)  
use of the eligibility information will have access to children’s eligibility information:

*Specify by name(s) or title(s):* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Use children’s free and reduced price eligibility information for the following specific purpose(s):

*(Describe):* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Inform all persons that have access to children’s free and reduced price meal eligibility information that the information is confidential, that children’s eligibility information must only be used for purposes specified above, and the penalties for authorized disclosures.

Protect the confidentiality of children’s free and reduced price meal or free milk eligibility information as follows:

*Specifically describe how the information will be protected from unauthorized uses and further disclosures:* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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**Description of Procedures to Transfer Meal Eligibility Information** (May be completed by either the determining agency or receiving agency.)

Describe the procedures for transferring students' meal eligibility information from the determining agency to the requesting agency/program so as to limit the number of individuals who have access to the information:

*Describe:* \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### IV. EFFECTIVE DATES

This agreement shall be effective from \_\_\_\_\_ to \_\_\_\_\_.

### V. PENALTIES

Any person who publishes, divulges, discloses, or makes known in any manner, or to an extent not authorized by Federal law (Section 9(b)(2)(C) of the National School Lunch Act; 42 USC 1758(b)(2)(C)) or a regulation, any information about a child's eligibility for free and reduce price meals or free milk shall be fined not more than \$1,000 or imprisonment of not more than 1 year or both.

### V. SIGNATURES

The parties acknowledge that children's free and reduced price meal and free milk eligibility information may be used only for the specific purposes stated above, that unauthorized use of free and reduced price meal and free milk information or further disclosure to other persons or programs is prohibited and a violation of Federal law which may result in civil and criminal penalties.

**Requesting Agency/Project Administrator**

<b>Printed Name:</b>	
<b>Title:</b>	<b>Phone:</b>
<b>Signature:</b>	
<b>Date</b>	

**Determining Agency Administrator**

<b>Printed Name:</b>	
<b>Title:</b>	<b>Phone:</b>
<b>Signature:</b>	
<b>Date</b>	

\*Any attachments will become part of this agreement.

(EXCEPTION)

SHARING INFORMATION WITH MEDICAID/SCHIP

Dear Parent/Guardian:

If your children get free or reduced price school meals, they may also be able to get free or low-cost health insurance through Medicaid or the State Children’s Health Insurance Program (SCHIP). Children with health insurance are more likely to get regular health care and are less likely to miss school because of sickness.

Because health insurance is so important to children’s well-being, the law allows us to tell Medicaid and SCHIP that your children are eligible for free or reduced price meals, unless you tell us not to. Medicaid and SCHIP only use the information to identify children who may be eligible for their programs. Program officials may contact you to offer to enroll your children (filling out the Free and Reduced Price School Meals Application does not automatically enroll your children in health insurance).

If you do not want us to share your information with Medicaid or SCHIP, fill out the form below and send in (sending in this form will not change whether your children get free or reduced price meals).

No! I DO NOT want information from my Free and Reduce Price School Meals Application shared with Medicaid or the State Children’s Health Insurance Program.

If you checked “no”, fill out the form below.

Child’s Name:	School:
Signature of Parent/Guardian:	Date:
Printed Name:	
Address:	
City:	State: Zip:

For more information, you may call [name] at [phone].  
Return this form to:  
[address] by [date]

Sharing Information with Other Programs

### SECTION III DIRECT CERTIFICATION FOR FREE MEAL BENEFITS

#### *NOTIFICATION OF PREDETERMINED ELIGIBILITY*

All school food authorities (SFA) that accept household applications as a method of determining free or reduced eligibility are required to participate in the state's Direct Certification (DC) process. The DC process matches student enrollment records (for those SFAs that utilize the PowerSchool student data management system) throughout the school year with SC Department of Social Services (DSS) eligibility records for Supplemental Nutrition Assistance Program (SNAP a.k.a. food stamps) and Temporary Assistance to Needy Families (TANF). As of the 2013-2014 school year, this process was expanded to include DSS records of all children placed in the state's Foster Care system. For those SFAs without PowerSchool availability, a match list will not be available. However, access is provided to a searchable database to allow those SFAs the ability to locate children and create their own match list.

Children identified through this process are automatically designated as Free from the date the match is identified through the first thirty (30) operating days of the following school year. All DC records should be treated with the same level of privacy and confidentiality as other free-and-reduced eligibility documentation.

**A written notice must be sent to each household with children certified as eligible for free meal benefits through direct certification.** The notice must advise them that: (1) their children are eligible for free meals; (2) no further application is required unless the household has children not listed and attending school; and (3) the household should notify the SFA if they do not want their children to receive free benefits.

SFAs should complete the letter (APPENDIX J of the Free and Reduced Price Policy package) by entering the name, address and telephone number of the contact person and the signature of the authorized representative in the signature block before reproducing on district letterhead. It is strongly recommended that no further reformatting be done.

#### Predetermined Eligible Submitting An Application

One of the difficulties encountered by reviewing officials with regard to the direct certification process is that households submit an application even after they have received the notification of predetermined eligibility. In an attempt to reduce the number of applications received for directly certified students, SFA officials are encouraged to send the notification of predetermined eligibility as early as possible. When meal applications are submitted for a directly certified student, **the direct certification takes precedence over the application.**

#### Required Documentation

Documentation that a letter of notification was provided to the household must be maintained. Note the date that the letter of notification was provided to each household on the list beside the child's name or use another method compatible with existing software systems.

Once the eligibility determination has been made from the direct certification list, retain the list as documentation for reimbursement claims. The list should be filed with the applications for free and reduced-price meals and should be readily retrievable by school.

#### Direct Certification of Siblings and other children in household

If at least one (1) child in a household is identified as having DC status on the basis of SNAP or TANF benefits, then all children in that household are eligible for free meal benefits and should be considered as also having DC status. In instances where these additional children may not be

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identified through the regular DC process, SFAs are required to make all reasonable efforts to identify these additional children. Documentation to support common residency can be provided through student enrollment records or the completion of a household eligibility application. This extension of benefits does not apply to foster children.

### Distribution of Applications: Option for Schools Implementing Direct Certification

The distribution of the letter to households and application forms to households of all children enrolled in the SFA at the beginning of the school year is required to ensure that no child is inadvertently excluded from participation. **SFAs that implement direct certification are not required to send the letter to households and application form to those households eligible under direct certification if these materials are distributed through the mail, individual student packets, or other methods that prevent the overt identification of children eligible for direct certification.** Under this option, households will receive either a letter to households with an application or a letter notifying them that their children are eligible for free benefits.

### Effects of Direct Certification on Verification

Households whose children are determined eligible through use of the direct certification list are exempt from verification requirements. When the SFA count of applications on file on October 1 is taken for the purpose of determining the number of applications to be verified, children directly certified should not be included in the count. Also, directly certified children should not be counted as verified. Direct certification reduces the district's verification effort by reducing the number of applications on file, thus reducing the minimum required verification sample.

### SECTION IV

#### SPECIAL ASSISTANCE PROVISIONS 1, 2, and 3

Determining Eligibility for Free and Reduced Price Meals and Reimbursement Claim Procedures\*

Three special assistance provisions are available to SFAs and individuals schools for determining meal eligibility and claiming meals for Federal reimbursement monies. SFAs and/or schools, especially with high percentages of free and reduced-price eligibility, may want to consider participation.

##### **Provision 1**

In schools where at least 80% of the students enrolled qualify for free or reduced price meals, applications may be approved for a two-year period instead of one. The major qualifying factor to participate in this provision is to document the 80% eligibility based on March enrollment during the base year. Under this provision, the school must only approve meal applications every other year. Other recordkeeping requirements remain the same for claiming meals, etc. A correctly approved application for free or reduced-price meals would be valid for two years. Schools would be required to send a meal application to all other enrolled students to ensure no student was denied free or reduced-price meal benefits if eligible during the second year of the provision.

##### **Provision 2**

Allows school to provide free meals to all students regardless of eligibility for program benefits for up to four years including the base year of the provision. This universal free program has many benefits including the obvious reduction in paperwork; however, it is best implemented in schools and/or districts where the majority of students are currently eligible for free and reduced-price meal benefits. The school district must be financially able to replace the student revenue not collected from full paying and reduced-price students. After the base year when applications are processed and meal counts are obtained for each claiming category, reimbursement is based on percentages and actual daily meal counts for free and reduced-price and paid are not required.

##### **Provision 3**

Allows school to receive a comparable level of Federal cash and commodity support each year as it received in the base year, provided the school serves **all** meals at no charge. The base year is the last year eligibility determinations and meal counts by category are obtained under program rules. Reimbursable meals are served at no charge to all participating students for a period up to 4 years, or longer if an extension is granted. The level of Federal cash and commodity support is adjusted to reflect annual changes in enrollment and inflation.

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\* Optional provisions for determining eligibility and claiming meals under the National School Lunch and Breakfast Programs are a result of paperwork reduction allowed in Section 9 of Public Law 95-166 and Amendment 19 to Part 245.9 of the program regulations. See attached chart for additional details and a comparison of the provisions.

### Special Assistance Provision 1

The National School Lunch Program regulations contain a clause known as Provision 1. The purpose of this regulatory provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications. Provision 1 allows SFAs with schools having 80 percent or more of their students eligible for free or reduced price meals to extend eligibility for such benefits for a two-year period based on the first year's applications.

#### General Requirements

##### Base Year:

- ◆ Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the required public announcement that is regularly published at the beginning of the school year.
- ◆ Meal counts are taken and claimed for reimbursement using standard procedures; i.e., by the eligibility category of the child receiving the meal.
- ◆ Participating schools must document that 80% of the enrollment during March is eligible for free and reduced-price meals.

##### Year 2

- ◆ To continue under this Provision the second year, the 80% free and reduced price eligibility criteria must be met.
- ◆ Distribution of applications and eligibility determinations may be limited to newly enrolled students and to reduced/full paid students seeking an increase in benefit level. In no event may a student be denied a free or reduced-price meal because of ineligibility the first year of the provision.
- ◆ A correctly approved free/reduced-price meal application from the base year would be valid during this second year.
- ◆ Schools selecting this provision must continue to take daily counts of the number of students served a reimbursable meal.

### Special Assistance Provision 2

The National School Lunch Program regulations contain a clause known as Provision 2. The purpose of this regulatory provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications, notifying the public, and counting meals by category for schools that agree to serve all enrolled students free meals. In accordance with this provision, the SFA agrees to pay from other than federal funds any program costs not covered by program income.

#### General Requirements

##### Base Year:

- ◆ Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the required public announcement that is regularly published at the beginning of the school year.
- ◆ After all applications have been received and approved, a second public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- ◆ Meals are served free to all students.
- ◆ Meal counts are taken and claimed for reimbursement using standard procedures; i.e., by the eligibility category of the child receiving the meal.
- ◆ If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service program costs, non-federal funds must be used to pay the difference.
- ◆ During the Base Year, a complete review of the food service operation by the South Carolina State Office of Nutrition Programs will be conducted to document and ensure the accuracy of the current methods being used by the district to determine free, reduced-price and paid categories, and counting and claiming procedures used to report claims for reimbursement.
- ◆ The percentage of the total meals is calculated monthly by school and by program for each category. This information is gathered in the base year for use in following years to establish the reimbursement claims.

##### Years 2, 3, and 4

- ◆ At the beginning of each school year, a public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- ◆ No distribution of applications and no eligibility determinations are conducted.
- ◆ Officials count only total meals served and apply the monthly percentages developed during the Base Year to determine the counts by type for the reimbursement claims.
- ◆ If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service program costs, non-federal funds must be used to pay the difference.

##### Beyond Year 4

- ◆ The State Agency may authorize schools participating under Provision 2 to extend their current cycle and established claiming percentages without going through the meal application process again. However, available socioeconomic data approved by USDA must indicate that the income level of the school populations has remained the same since the base year.

### Special Assistance Provision 3

The National School Lunch Program regulations contain a clause known as Provision 3. The purpose of this regulatory provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications, notifying the public, and counting meals by category for schools that agree to serve all enrolled students free meals. In accordance with this provision, the SFA agrees to pay from other than federal funds any program costs not covered by program income.

#### General Requirements

##### Base Year:

- Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the public announcement that is regularly published at the beginning of the school year.
- After all applications have been received and approved, a second public notice can be made stating that all meals will be provided free to all students regardless of economic status. The service of all meals at no charge is encouraged but optional under Provision 3 during the base year.
- Meals are served free to all students if school chooses to begin during base year.
- Meal counts are taken and claimed for reimbursement using standard procedures; i.e. by the eligibility category of the child receiving the meal.
- If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service program costs, non-federal funds must be used to pay the difference.
- Because the base year establishes the levels of support for the four successive non-base years to follow, the school should maximize participation of all students and ensure that reimbursable quality meals are served. Offering all meals at no charge during the base year should optimize participation and thus cash assistance and commodities to be received in successive years.

##### Years 2, 3, 4, and 5

- At the beginning of each school year, a public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- No distribution of applications and no eligibility determinations are conducted.
- Schools receive the level of Federal cash and commodity support paid to them during the base year. Total meal counts are taken for management purposes only. Federal cash and commodity support is adjusted to reflect changes in enrollment and inflation.
- If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service costs, non-federal funds must be used to pay the difference.

##### Beyond Year 5

- The State Agency may authorize schools participating under Provision 3 to extend their current cycle if socioeconomic data is reflective of the school's population, provides equivalent data for both the base year and the last year of the current cycle, and demonstrates that the income of the school's population remained stable, declined, or had negligible improvement.

## Chapter 3 – Policy Agreement

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### PRICING PROGRAM – 20\_\_-20\_\_ POLICY AGREEMENT FOR FREE AND REDUCED PRICE MEALS

The \_\_\_\_\_  
(Name of School Food Authority)

has agreed to participate in the National School Lunch Program and the School Breakfast Program and to receive commodities donated by USDA and accepts responsibility for providing free and reduced price meals to eligible children in the schools under its jurisdiction.

The School Food Authority (SFA) assures the S.C. Department of Education, Office of Nutrition Programs, that the school system will uniformly implement the following policy to determine children's eligibility for free and reduced price meals in all National School Lunch Programs, School Breakfast Programs, and commodity-only schools under its jurisdiction. In fulfilling its responsibilities the School Food Authority agrees to:

- A. Serve meals free to children from households whose income is at or below that listed in Appendix A, column 1, to households providing a SNAP case number or a TANF case number, documented foster children, and to those students pre-approved by direct certification.
- B. Serve meals at a maximum reduced price of 40¢ for lunch and 30¢ for breakfast to children from households whose income is within that listed in Appendix A, column 2.

#### Income

"Income" means current income before deductions for income taxes, employees' social security taxes, insurance premiums, bonds, etc. It includes the following:

1. Monetary compensation for services, including wages, salary, commission or fees
2. Net income from non-farm self-employment
3. Net income from farm self-employment
4. Social Security
5. Dividends or interest on savings or bonds, income from estates or trusts, or net rental income
6. Public assistance or welfare payments and Supplemental Security Income
7. Unemployment and workers' compensations
8. Government civilian employee or military retirement or pensions or veteran's payments
9. Private pensions or annuities
10. Alimony or child support payments
11. Regular contributions from persons not living in the household
12. Net royalties
13. Other cash income (i.e., cash amounts received or withdrawn from savings, investments, trust accounts or other resources)

- C. Ensure that there will be no physical segregation of, nor any other discrimination against, any child because of his or her inability to pay the full price of the meal. The names of the children eligible to receive free or reduced price meals shall not be published, posted, or announced in any manner and there shall be no

## Chapter 3 – Policy Agreement

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overt identification of any such children by use of special tokens or tickets or any other means. Further assurance is given that children eligible for free or reduced price meals shall not be required to:

1. Work for their meals
2. Use a separate lunchroom
3. Go through a separate serving line
4. Enter the lunchroom through a separate entrance
5. Eat meals at a different time
6. Eat a meal different from that sold to children paying the full price

D. Ensure that in the operation of child feeding programs, no child shall be discriminated against because of race, sex, color, national origin, age or disability.

E. Verify in accordance with program regulations and maintain records as follows: (1) a summary of all verification efforts; (2) the total number of applications on file as of October 1; and (3) the methodology used. Compliance with these requirements will be monitored by the State agency and through the annual submission of the Verification Summary Report.

F. Establish and use a fair hearing procedure for parents' appeals of the SFA's decisions on applications and for challenges to the correctness of information contained in an application or to the continued eligibility of any child for free or reduced price meals. During the appeal and hearing, the child will continue to receive free or reduced price meals. A record of all such appeals and challenges and their disposition shall be retained for three (3) years.

Prior to initiating the hearing procedure, the parent or SFA may request a conference to provide an opportunity for the parent and SFA to discuss the situation, present information, and obtain an explanation of data submitted in the application and decisions rendered. Such a conference shall not in any way prejudice or diminish the right to a fair hearing.

The hearing procedure shall provide the following:

1. A public-announced, simple method of making an oral or written request for a hearing.
2. An opportunity to be assisted or represented by an attorney or other person.
3. An opportunity to examine, prior to and during the hearing, the documents and records presented to support the decision under appeal.
4. Reasonable promptness and convenience in scheduling a hearing and adequate notice as to the time and place.
5. An opportunity to present oral or documentary evidence and arguments supporting their position.
6. An opportunity to question or refute any testimony or other evidence and to confront and cross-examine adverse witnesses.
7. That the hearing be conducted and the decision made by a hearing official who did not participate in the decision under appeal or in any previous conference.
8. That the decision of the hearing official be based on the oral and documentary evidence presented at the hearing and made a part of the hearing record.
9. That the parties concerned and any designated representatives thereof are notified in writing of the decision and a copy of the notification to the parties concerned of the hearing official's decision.

## Chapter 3 – Policy Agreement

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10. That for each hearing a written record be prepared, including the decision under appeal, any documentary evidence and a summary of any oral testimony presented at the hearing, the decision of the hearing official with the reason for the decision and a copy of the notification to the parties concerned of the hearing official's decision.

11. That such written record be preserved for a period of three (3) years and shall be available for examination by the parties concerned or their representatives at any reasonable time and place during such period.

G. Designate a SFA official to review applications and make determinations of eligibility. The reviewing official will use the criteria outlined in this policy to determine which individual children are eligible for free or reduced price meals.

H. Develop and send to each child's parent or guardian a letter as outlined in Appendix B which includes an income scale and a household application form with instructions for free and reduced price meals (Appendix C), at the beginning of each school year and whenever there is a change in eligibility criteria or whenever local employment conditions change due to major strikes or layoffs.

Parents will be requested to complete the application and return it to the SFA official responsible for application approval for review. **SUCH APPLICATIONS AND DOCUMENTATION OF ACTION TAKEN WILL BE MAINTAINED FOR THREE (3) YEARS AFTER THE END OF THE SCHOOL YEAR TO WHICH THEY PERTAIN.**

Applications may be filed at any time during the year. Any parent enrolling a child in school for the first time, at any time during the year, shall be supplied with an application. If a child transfers from one school or site to another under the jurisdiction of the same SFA, his/her eligibility for a free or reduced price meal will be transferred to and honored by the receiving school.

All children from a household will receive the same benefits. Within ten working days of the receipt of applications, parents or guardians will be notified individually of the acceptance or denial of their applications. Children will be served meals immediately upon the establishment of their eligibility.

When an application is rejected, parents or guardians will be informed in writing of the reason for denial and of the hearing procedure. A copy of all denial notifications will be retained on file. The reasons for ineligibility shall be properly documented and retained on file at the SFA level. The designated hearing official is the District Superintendent or an appointed designee. (The hearing official must be someone not involved in the original eligibility determination.)

I. Submit a public release to the news media, local unemployment offices, and major employers contemplating large layoffs. The public release will contain the same information outlined in the parent letter and the income guidelines for free and reduced price meals (Appendix A) at the beginning of the school year.

J. Establish a procedure to collect money from children who pay for their meals. The procedures described in Attachment F will be used so that no other children in the school will consciously be made aware by such procedure of the identity of the children receiving free or reduced price meals.

## Chapter 3 – Policy Agreement

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K. Establish a system for obtaining on a daily basis an accurate count of meals served by category--free, reduced, and paid. The system(s) described in Attachment F will be used to determine the accurate count and to ensure that no other children in the school will consciously be made aware of the identity of those children receiving free or reduced price meals.

L. Submit to the S.C. Department of Education, Office of Nutrition Programs, any alterations or amendments, public announcements, etc., prior to implementation. Such changes will be effective only upon approval. All changes in eligibility criteria must be publicly announced in the same manner used at the beginning of the school year.

### Policy Agreement Attachments

The following attachments are adopted and considered part of this policy:

- Appendix A: Income Eligibility Guidelines
- Appendix B: Letter to Households
- Appendix C: Application Forms and Instructions
- Appendix D: Notification of Eligibility Letter
- Appendix E: Public/Media Release
- Appendix F: Meal Count/Collection Procedures
- Appendix G: Notification of Selection for Verification of Eligibility
- Appendix H: Letter of Verification Results
- Appendix I: Verification Roster
- Appendix J: Notice/Letter of Predetermined Eligibility

By affixing my signature below, I attest to the fact that I have read and agree to implement all assurances and agreements pertaining to the school year 20\_\_-20\_\_ Policy Agreement for Free and Reduced Price Meals.

### APPROVED BY:

**S. C. Department of Education  
Office of Nutrition Programs:**

**SFA Use:**

\_\_\_\_\_  
**Director, Office of Nutrition Programs**

\_\_\_\_\_  
**Superintendent or Authorized Designee**

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

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

## Chapter 3 – Policy Agreement

### NON-PRICING PROGRAM – 20\_\_-20\_\_ POLICY AGREEMENT FOR FREE AND REDUCED PRICE MEALS

(For use by schools and program sites that do not have separately identifiable charges for meals.)

The \_\_\_\_\_ agrees to participate in the National School  
(Name of School Food Authority)

Lunch Program and accepts responsibility for the School Breakfast and Afterschool Snack Programs by providing free and reduced-price meals to eligible children in the school(s) under its jurisdiction.

The SFA assures the South Carolina Department of Education that the following policies administering the program(s) in the school(s) and sites under its jurisdiction will be uniformly implemented. In fulfilling these responsibilities, the SFA:

1. Agrees that there will be no physical segregation of, nor any other discrimination against, any child.
2. Agrees that in the operation of Child Nutrition Programs, no child shall be discriminated against because of race, color, sex, age, national origin, or disability.
3. Agrees to submit to the South Carolina Department of Education any changes to this Policy Agreement prior to implementation of these changes. **Such changes will be effective only upon approval.**

Agrees to establish a procedure to accurately count at the point of service the number of meals claimed, and to plan and produce meals with the objective of providing one reimbursable lunch and/or breakfast and/or afterschool snack per child per day. Any excess meals shall not be claimed for reimbursement.

#### **COMPLIANCE WITH THESE REQUIREMENTS WILL BE MONITORED BY THE S.C. DEPARTMENT OF EDUCATION AS PART OF ITS SUPERVISORY ASSISTANCE AND MONITORING EFFORTS.**

The following attachments are considered part of this policy:

Meal Count Methods (**Appendix A**), and sample RCCI Meal Eligibility Documentation sheet (**Appendix B**). **Appendix A** must be your guide for choosing the appropriate meal count procedures. Information on these meal count procedures must be entered on the SCAPS (South Carolina Automated Payment System) for each site and program. **Attachment B** is for your use in documenting eligibility at the program site.

#### **IMPORTANT NOTICE**

\*This non-pricing program policy applies to residential students only. If day students are involved in any manner, a pricing policy covering free and reduced price eligibility will also be needed.

#### **APPROVED BY:**

**S. C. Department of Education  
Office of Nutrition Programs:**

**SFA:**

\_\_\_\_\_  
Director, State Office of Nutrition Programs

\_\_\_\_\_  
Signature of SFA Representative

\_\_\_\_\_  
Date

\_\_\_\_\_  
Date

**NON-PRICING PROGRAMS - Appendix A**

Meal Count/Collection Procedure(s)

School Food Authority: \_\_\_\_\_

Complete the checklists in Section A to indicate procedures used in your SFAs for counting meals and collecting revenues by placing a check in the applicable box. Then continue to Section B of Appendix A for detailed descriptions of the count procedures to be used at school sites. The actual procedures will be entered by site in the required profile information obtained via SCAPS (South Carolina Automated Payment System).

SECTION A:

1. All approved meal count/collection procedures must include a method for prepayment and/or post billing (charging). **Charging is seldom recommended.** The provision for allowing for prepayment and/or post-billing should make free and reduced-price meal recipients appear as students who pay full or reduced price. **Check one or more of the following:**

- Students or parents can make full and reduced-price meal payments in advance in a designated area away from the cafeteria serving line on a daily, weekly, or monthly basis. Students receiving free meal benefits receive such meals in the exact same way as paying students.
- Full and reduced-price meals can be post-billed (charged). Parents are billed and may mail in payments or students or parents may pay in a designated area away from the cafeteria serving line for meals already received. Care is taken that neither the billing nor the payment identifies those who pay nothing.

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2. The option of prepayment (and/or charging) of meals should be routinely publicized. This may be done by using methods such as posting signs, making public announcements, including the information in printed material, etc. Some districts offer incentives for prepayment options when cash is also accepted on the serving line. **Check one or more of the following:**

- The ability for students and/or parents to prepay (or charge) is routinely advertised:
- In the letter to parents (Notice/Letter to Households) sent home with the application at the beginning of each school year.
  - In an announcement made over the school’s public address system.
  - In a newspaper/newsletter article.
  - By a posted notice (sign) displayed in the cafeteria area.

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3. The medium of exchange for free and prepaid (or post-billed) reduced and full-price meals must be identical except for the code. Color-coding by category or single-symbol coding using obvious identifiers such as F, R and P is prohibited. **Check one or more of the following that are used in district schools.**

- Medium of exchange is coded in the following manner:
- Coding series. *Example: (Free – 1 through 1,999) (Reduced price – 2,000 through 3,999) (Full price – 4,000 and above).*
  - Coding by number. *Example: Number ending in 0, an odd or even number.*
  - Coding by variation. *Example: Variations in signature, placement of date or ticket distributor such as Mary Smith, Mary J. Smith and M. Smith.*
  - Coding by subtle differences. *Example: Differences in printing such as capital letter, period, spacing of a line or differences in underlining.*
  - Coding by number digits. *Example: 4 digits for free, 5 digits reduced-price and 6 digits for full price.*
  - Coded by bar line for scanning.
  - Coded number used on a keypad.

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## Chapter 3 – Policy Agreement

4. All approved meal count/collection procedures must include a point-of-service count by reimbursable meals by category. **“At the point of service” is defined as that point in the meal service line where it can be determined that a reimbursable meal was served.** To ensure that only meals meeting requirements are claimed for reimbursement, the end of the serving line is considered the “point of service”. Counts taken in the classroom, unverified morning meal counts, the number of tickets sold/issued, head counts, tray counts and counts obtained by “backing into” the numbers of meals served are **not** point-of-service counts. **Check one of the following:**

- The cashier is stationed at the end of the serving line, determines that the meal selected is reimbursable, and counts the meal by category.
- Other. An alternate method must be individually written and pre-approved through an on-site visit by State Office staff. If a student selects a non-reimbursable meal, a system must be in place for removing that meal from the count of meals claimed for reimbursement. Please list schools approved with an alternate point-of-service meal count:

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### SECTION B:

Section B describes meal count procedures for participating schools to choose from for entry on the school/site profile information requested during the application process. The following meal count procedure codes will be provided on the application/SCAPS profile document, replacing the former Application to Participate:

- A- Verbal identifier entered on a numbered sheet or daily roster
- B- Coded ticket/token presented and collected
- C- Coded ticket/token tallied mechanically and/or recorded as presented and not physically collected
- D- Automated tab cards are presented and cut for a mechanical tabulation
- E- Bar code card or roster scanned for each student and electronically counted
- F- Student or cashier enters coded number or other identifier on pad and meal is electronically counted
- G- Other state-approved procedure is used

**For example:** Apex Elementary uses a coded ticket and the code is entered on a cash register at the point of service to obtain a meal count for lunch. At breakfast the students provide their names to a cashier and the cashier checks off the student’s name on a coded roster. Thus, on the school/site profile, Apex Elementary would enter: meal count procedure code “C” for lunch and “A” for breakfast. An afterschool snack program also is operated at Apex and a daily roster is used to record the names of students participating and receiving a snack each day. Again, the meal count procedure code will be “A” indicating the use of a daily roster.

5. Regardless of the procedure selected, all approved meal count/collection procedures must include a medium of exchange that is issued to students for obtaining a meal. Students receiving free meals must be issued the identical medium of exchange as those students prepaying (or charging) full or reduced price meals. The systems for coding, distributing and collecting the medium of exchange must ensure that students receiving free and reduced price meal benefits are not overtly identified. A common area and method for distributing and collecting the medium of exchange must be used for all students regardless of meal category. Students receiving free meals and those pre-paying or post-billed for full or reduced price meals will be issued:

- A verbal identifier to be used on the serving line in exchange for the meal. Numbers or student names are the most commonly used verbal identifiers.
- A coded ticket or token.
- A coded I.D. card.
- A coded automated tabulation card.
- A coded bar line card for scanning.
- A coded number for use on a keypad or an imaging reading such as a thumbprint.

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6. It is understood that in addition to prepaid (or post-billed/charged) meals, some cash meals may also be sold and counted. Meals paid for in cash on the line may be counted in a different manner than those prepaid (or post-billed/charged). These meals may be tallied, counted mechanically, recorded on a cash register, etc. However the medium of exchange for students receiving free, prepaid reduced-price or prepaid full-price meals must be collected and counted in exactly the same manner.

When students receiving **free, prepaid reduced or prepaid full price** meals pass the cashier, they:

- Call out their number and the cashier strikes it from a numbered sheet. The count by category is taken from the numbered sheet.
- Call out their name and the cashier checks the name off a coded roster. The count is taken from the roster by category.
- Present a coded ticket/token and it is collected. The count is taken from the tickets/tokens.
- Present a ticket and all tickets are marked in some manner and returned to the student. Simultaneously, the count by category is tallied, mechanically recorded on a cash register, etc.
- Present an automated tab card. The card is mechanically cut and a count by category is simultaneously taken.
- Present a bar line card. The card is scanned and a count is simultaneously taken.
- Enter a personal identifier on a keypad or present finger or thumb for imaging. As an identifier is entered, a count by category is electronically recorded.

✦   ✦   ✦   ✦   ✦   ✦

By using steps 1-6 as outlined in this Appendix, it is possible to describe most meal count/collection procedures used throughout the state. If an alternate method is used, it must be individually written. Care should be taken to include all necessary information as outlined below:

- How can meals be prepaid or charged?
- How is the system for prepayment and charging advertised?
- What medium of exchange will be issued to students receiving free or prepaid (or charged) reduced-price or full-price meals?
- How will the medium of exchange be coded?
- Where is the count by category taken? If the meals are served outside the cafeteria, counts must be verified and actual students receiving meals must be documented by name on a daily basis. **Any time counts are not taken at the actual point of service in the cafeteria and at the end of the serving line, a school food service employee must be responsible for overseeing and obtaining an accurate meal count.**

**An alternate method will have to be pre-approved and entered on the school/site profile as Code G "other state-approved procedure is used".** In order to use this code your alternate meal count procedures must be fully described in detail so that a State Agency visit may be scheduled if necessary to evaluate the procedure to be used. \_\_\_\_\_

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# School Food Service Program Reference Manual

Contributors: Sharon Hunt & Walter Caudle, APM

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# Chapter 4 – Civil Rights Compliance

## Civil Rights Laws

Child Nutrition Programs (CNPs) have always been available to all children on an equal opportunity basis. In 1983 the U.S. Department of Justice issued civil rights compliance requirements for all federal agencies based on the following legislation:

- Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color, or national origin;
- Title IX of the Education Amendments of 1972, which prohibits discrimination based on sex;
- Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination based on disability; and
- Age Discrimination Act of 1975, which prohibits discrimination based on age.

## Discrimination

School Food Authorities (SFAs) are prohibited from discriminating against students receiving free and reduced-price meal benefits.

- There must not be any discrimination on the basis of race, color, national origin, sex, age, or disability in the application approval process or in the selection of applications for verification.
- The names of eligible students must not be published, posted, or announced in any manner or used for any purpose other than determining and verifying eligibility for free and reduced-price meal benefits. (See [Chapter 5 – Confidentiality & Disclosure of Eligibility](#) for additional information.)
- Eligible students must not be required to work for their meals.
- Eligible students must not be required to use a separate dining room, separate serving line, or eat at a separate time.
- There must not be any overt identification of any of the students by use of special (e.g. different colored) tokens or tickets. The SFA must use the meal count and collection procedure(s) approved as part of its free and reduced-price meal Policy Agreement (see [Chapter 3 – Policy Agreement](#) for additional information). When ordering meals for special functions (i.e. field trips, class parties, etc.), no method of overt identification can be used (e.g. students raising hands, forms sent home that identify eligibility, etc.)

## SFA's Responsibilities

As a result of the U.S. Department of Justice's requirements, the U.S. Department of Agriculture (USDA) developed policy instructions for CNPs. The USDA instructions require each local SFA to take the following actions:

## Chapter 4 – Civil Rights Compliance

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- Comply with all rules and regulations governing nondiscrimination in the administration of the CNP. Compliance will be verified by the South Carolina Department of Education (SCDE) during on-site administrative reviews, audits, and other federal and state monitoring visits.
- Inform parents or guardians of children, local minority and grassroots organizations as well as any major employers contemplating layoffs of (1) the availability of program benefits and services, (2) the nondiscrimination policy, and (3) all significant changes in existing requirements that pertain to program eligibility and benefits. Note: This may be accomplished using the Public Media Release and Parent/Guardian Letter (see letters provided in Chapter 3– Policy Agreement in this *Program Reference Manual*).
- Upon request, make available to the public and to participants and potential participants, information about program requirements and the procedures for filing a complaint, in English and/or in the appropriate translation to non-English speaking persons.

USDA translations in over 25 languages may be downloaded from:

[www.fns.usda.gov/cnd/FRP/frp.process.htm](http://www.fns.usda.gov/cnd/FRP/frp.process.htm). If using USDA's translations, also download the English version so that the information provided can be more easily interpreted.

- Ensure that all forms of communication and program materials regarding the CNP that are printed for public information, public education or public distribution include the following nondiscrimination statement and procedure for filing a complaint:

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

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

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

## Chapter 4 – Civil Rights Compliance

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- If the material is too small to permit the use of the full statement, the material shall include the following statement, in print no smaller than text:

“USDA is an equal opportunity provider and employer.”

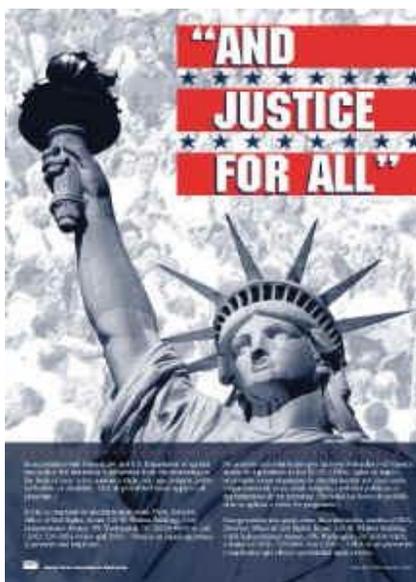
- If the printed material is too small to permit the full statement to be included (e.g. one page or less), the material must at a minimum include the following statement, in print no smaller than the text:

“This institution is an equal opportunity provider.”

- Following public service announcements on the internet, radio or television, the following statement, in place of the entire nondiscrimination statement, may be read:

“The <program name> is an equal opportunity provider.”

- Display the nondiscrimination poster in a prominent place in each school within view of the customers (i.e. not in the kitchen preparation area). The current poster (shown here) measures 11 inches by 15 inches and features a picture of the Statue of Liberty. This poster may not be reproduced. If additional or replacement copies are needed please contact the Office of Nutrition Programs, SCDE at (803) 734-8188.



- On a case-by-case basis, a child with disabilities and/or life-threatening food allergies shall be provided substitutions in foods at no extra charge only when supported by a statement signed by a physician licensed by the state. The supporting statement shall identify:
  - The child’s disability and an indication of why the disability restricts the child’s diet.
  - The major life activity affected by the disability.
  - The food or foods to be omitted from the child’s diet and the food or foods that must be substituted.

SFAs are not expected to make accommodations that are so expensive or difficult that they would cause the organization undue hardship. (Chapter 21 Students with Special Dietary Needs for additional information on providing meals for students with disabilities.)

## Chapter 4 – Civil Rights Compliance

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- Establish procedures that effectively restrict access to records to authorized personnel. (See Chapter 5 – Confidentiality & Disclosure of Eligibility for additional information.)
- Train “front line staff” and their supervisors annually. These are employees who interact with program applicants or participants regarding program services and benefits. At a minimum, these employees should review either the Civil Rights Training for Front Line Staff (Page 4-6) provided at the end of this chapter or the information provided in this entire chapter each school year.

### Handling Complaints

Any person alleging discrimination based on race, color, national origin, sex, age, or disability has a right to file a complaint. Complaints may be made to federal, state or local agencies. When a complaint of discrimination is received by an SFA...

- Notify either SCDE or USDA within five working days of receiving the complaint.
  - Preferably notify SCDE at (803) 734-8188. Forward any written materials received to them at: Office of Nutrition Programs, 1429 Senate Street, Suite 700, Rutledge Building, Columbia, SC 29201. SCDE may be able to assist the SFA in handling the complaint. SCDE will forward all materials to USDA within five working days of receipt.
  - Alternatively, notify USDA’s Southeast Regional Office at (404) 562-1801. Forward any written materials received to them at: Director, Civil Rights, Food and Nutrition Service, Southeast Regional Office, 61 Forsyth St., S.W., Atlanta, GA 30303-3427. USDA will resolve all complaints following established methods and regulations.
- Provide the Discrimination Complaint Form (Form 4-A) provided at the end of this chapter to any individual wishing to make a complaint of discrimination. Complaints may be made using the form provided, in another format or verbally. If the complaint is made verbally (either in person or through a phone conversation), the person accepting the complaint should complete the form on behalf of the person with the complaint.

### Racial/Ethnic Data

- Be prepared to provide an ethnic breakdown of the students enrolled and/or eligible for meal benefits. This data may be collected using the Free and Reduced-Price School Meals Family Application as provided by SCDE (See Chapter 3 – Policy Agreement for a sample of this form). The application forms contain a section in which a household member or school personnel can note the racial/ethnic category for those students listed on the application. This information may be completed using any of the following methods:
  - Voluntary self-identification on the meal application form;
  - Observation of a school official; or
  - Personal knowledge.
- Maintain the actual number of students applying for free and reduced-price meals, as well as the corresponding racial/ethnic data for those students, on file for three years plus the current year.

## Civil Rights Training for Front Line Staff

“Front line staff” and their supervisors must receive civil rights training annually. These are employees who interact with program applicants or participants regarding program services and benefits. At a minimum, these employees should review this information and sign-off each year to verify that they read and understood the information.

Child Nutrition Programs (CNPs) have always been available to children on an equal opportunity basis. In 1983 the U.S. Department of Justice issued civil rights compliance requirements for all federal agencies.

### Federal law prohibits discrimination based on:

- Race
- Color
- National Origin
- Sex
- Age
- Disability

### School Food Authority’s Responsibilities:

- Comply with all rules and regulations.
- Make information about CNP benefits, requirements, and the procedures for filing a complaint available to the public and to households in their language.
- Include the nondiscrimination statement (provided below) on all forms of communication and program materials related to receipt of free and reduced-price meal benefits.
- Display the current U.S. Department of Agriculture (USDA) nondiscrimination poster in a prominent place in each school within view of the customers.
- Provide substitutions for students with disabilities when documented by a licensed physician.
- Restrict access to personal records.

### Handling Complaints:

Complaints of discrimination must be made directly to regional and federal agencies either in writing (in or on any form) or verbally. Use of the Discrimination Complaint Form provided is recommended as it will assist USDA in their investigation of the complaint. When a complaint of discrimination is received...

- Contact the South Carolina Department of Education at (803) 734-8188 or USDA at (404) 562-1801 within five working days
- Preferably provide complaint form to:
  - Any individual wishing to make a complaint.
  - Person(s) receiving verbal complaint(s).

### Obtain Racial/Ethnic Data by:

- Voluntary self-identification on the free and reduced-price meal application;
- Observation by school official; or
- Personal knowledge.

### Statement of Nondiscrimination

“In accordance with federal law and U.S. Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.

To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.”

**OR**

If publication is too small to include the above, full statement, print in font no smaller than text on page, “This institution is an equal opportunity provider.”

## Discrimination Complaint Form

*Any person or representative alleging discrimination based on race, color, national origin, sex, age, or disability has the right to file a complaint within **180 days** of the alleged discriminatory action. Complaints received by a School Food Authority or state agency must be forwarded to USDA within five working days. This form must be printed front to back and not on separate pages.*

1. Your Name:
  
2. Your Address (street, city, state, zip):
  
3. Your telephone: Home:(\_\_\_\_\_)\_\_\_\_\_ Work: (\_\_\_\_\_)\_\_\_\_\_
  
4. Name, phone and address of person(s) discriminated against, if different from above:
  
5. Name and address of the person(s) or organization(s) you are filing a complaint against:
  
6. List date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions:
  
7. Describe as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional paper as needed and attach them and any other materials pertaining to your case to this form.)
  
8. State on what basis you feel discrimination exists (race, color, national origin, sex, age or disability).
  
9. Provide contact information for any persons who may have knowledge of the actions described above:  

<i>Name:</i>	<i>Title:</i>	<i>Phone No.:</i>	<i>Address (business or personal):</i>
a.			
b.			
c.			
  
10. Do you have any other information that you think is relevant to the investigation? (Use additional paper if needed.)
  
11. What remedy are you seeking for the alleged discrimination?

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Signature

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Date

**OFFICE USE ONLY:**

Date Complaint Received: \_\_\_\_\_

Person Receiving Complaint: \_\_\_\_\_

Action(s) Taken:

***Civil rights complaints should be forwarded to:***

**OR**

Office of Nutrition Programs  
South Carolina Department of Education  
7<sup>th</sup> Floor Rutledge Building  
1429 Senate Street.  
Columbia, SC 29201  
Phone: (803) 734-8188

Director, Civil Rights  
Food and Nutrition Service, USDA  
Southeast Regional Office  
61 Forsyth St., S.W.  
Atlanta, GA 30303-3427  
Phone: (404) 562-1801

**South Carolina**  
**School Food Service Programs Reference Manual**  
Contributors: Sharon Hunt & Walter Caudle, APM  
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# Chapter 5 – Confidentiality & Disclosure of Eligibility

## Limitations on Disclosure

The issues of privacy and confidentiality of personal data are complicated as well as sensitive. Before developing local disclosure policies, each School Food Authority (SFA) should discuss the issue with SCDE staff and/or its legal counsel.

### Aggregate Information

The SFA may disclose aggregate information to any program or individual, such as the number of children eligible for free or reduced-price benefits. Information in the aggregate does not identify individual children. Therefore, parental notification and parental consent are not necessary.

### Disclosures are Restricted by Law

SFAs may disclose children's free and reduced-price Child Nutrition Program (CNP) benefit eligibility information to programs, activities and individuals that are specifically authorized access under the National School Lunch Act (NSLA). Disclosing information to authorized entities is an option, not a requirement.

The NSLA specifies that persons directly connected to the administration or enforcement of certain programs or activities are permitted to have access to children's eligibility information. The chart provided in this chapter lists possible recipient programs, the information that may be disclosed, and whether the program may have access to children's eligibility information without parental consent or without the opportunity to decline the disclosure.

A disclosure to any other federal, state or local program or individual that is not authorized in the NSLA requires parental consent, court order or subpoena. Programs that require parental consent include local health and local education programs and other local level activities. For example, the disclosure of children's eligibility for free and reduced-price meals to determine their eligibility for free text books or reduced fees for summer school requires parental consent because these are local initiatives.

Written consent is also required to disclose information other than names and eligibility status to programs authorized to receive only participants' names and eligibility status. For example, an SFA may disclose names and eligibility status to a federal education program but if the program requests family size, the SFA must obtain a parental waiver of confidentiality prior to disclosing the information.

Contact the Office of Nutrition Programs, SCDE at 803-734-8188 to discuss questions or concerns about disclosing student eligibility information.

### “Need to Know”

Although a program or person may be authorized under the NSLA to receive free and reduced-price eligibility information, there **must** be a legitimate need to know in order to provide a service or carry out an authorized activity.

## Chapter 5 – Confidentiality & Disclosure of Eligibility

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For example, a Summer Food Service Program sponsor receiving children’s free and reduced-price eligibility information can use that information **only** for the Summer Food Service Program. See the chart entitled, “Requirements and Limitations for Disclosure of CNP Eligibility Information” provided in this chapter for additional limitations on providing eligibility information to other programs.

### Disclosure of Social Security Numbers

The “Free and Reduced-Price School Meals Family Application” (provided in [Chapter 3– Policy Agreement](#)) generally requires the Social Security number of the adult household member who signs the application. Most programs that request children’s free and reduced-price eligibility information will not need the adult’s Social Security number.

However, when disclosing or using the Social Security number provided by the household on the application for any purpose other than the CNP, the sponsor **must** modify the notice required by the Privacy Act of 1974 concerning the potential uses of the Social Security number. This notice is included in the “Parent/Guardian Letter” (provided in [Chapter 3 – Policy Agreement](#)). The notice **must** inform households of the additional intended uses of the Social Security number.

### Penalties for Improper Disclosure

The NSLA establishes a fine of not more than \$1,000 or imprisonment of not more than one year, or both, for publishing, divulging, disclosing, or making known in any manner or extent not authorized by federal law, any eligibility information.

Only the CNP SFA is allowed to disclose eligibility information. An entity authorized by the NSLA to receive CNP eligibility information is **not** allowed to share that information with any other entity. For example, the SFA may provide students’ eligibility status to a federal education program. The federal education program receiving the information is not authorized to share it with any other entity.

### No Child Left Behind and Title I

In April 2009, the U. S. Departments of Agriculture and Education jointly issued updated policy guidance regarding the release of student eligibility information related to educational programs administered by the No Child Left Behind Act and Title I of the Elementary and Secondary Education Act.

CNPs may disclose the name and eligibility status of individual students for matters directly related to the administration of these federal education programs without parental consent. The release of this information does not extend to any information contained on eligibility applications and/or direct certification records. Any sharing of information must be on a “need to know” basis and follow other procedures outlined in this chapter.

### E-Rate

For federal auditing purposes mandated by the Federal Communications Commission and performed by the Universal Service Administrative Service Company, child nutrition programs may disclose the name and eligibility status of individual students for matters directly related to the administration of this federal education program without parental consent. For a small sample of eligible students, the release of this information may extend to actual applications and/or direct certification records. However, these auditors cannot retain any records, release any information to other parties, question the eligibility determination process, and/or contact the household for additional information.

## Chapter 5 – Confidentiality & Disclosure of Eligibility

### Requirements and Limitations for Disclosure of CNP Eligibility Information

Program or Individual Requesting Information	Information that May be Disclosed	Required Notification and Consent
<p><b>Child Nutrition Programs</b> under the National School Lunch Act (NSLA) or Child Nutrition Act</p> <p><b>Comptroller General</b> of the United States for purposes of audit and examination</p> <p><b>Federal, state, or local law enforcement officials</b> investigating alleged violations of any of the programs under the NSLA or investigating violations of any of the programs that are authorized to have access to names and eligibility status</p>	All eligibility information	Prior notice and consent are not required
<p><b>No Child Left Behind and Title I E-Rate</b></p>	Name and eligibility status	Prior notice and consent are not required
<p><b>Medicaid or The Partners for Healthy Children</b> (PHC - the state children's health insurance program) administered by a state or local agency authorized under Titles XIX or XXI of the Social Security Act to identify and enroll eligible children</p>	All eligibility information, unless the parent/guardian elects not to have information disclosed	Must give prior notice to parent/guardian and opportunity to decline to have the household's information disclosed
<p><b>Federal education programs</b></p> <p><b>State education or health programs</b> (other than Medicaid/PHC) administered by the state or a local education agency</p> <p><b>Federal, state, or local means-tested nutrition programs</b> with eligibility standards comparable to the Child Nutrition Programs</p>	Eligibility status only	<p>Prior notice required (see "Waiver of Confidentiality for Free and Reduced Price Meal Eligibility Disclosures" provided in <a href="#">Chapter 3 – Policy Agreement</a>)</p> <p>Prior parental consent not required</p>
<p><b>Any other federal, state, or local program or individual not listed above</b></p>	<b>NONE</b> , unless parental consent, court order or subpoena is obtained	Must obtain parental consent, court order or subpoena

## Chapter 5 – Confidentiality & Disclosure of Eligibility

### Agreements of Understanding

An agreement is not needed for federal, state, or local agency personnel evaluating or reviewing CNP operations. These activities are part of routine CNP operations.

Students' names and eligibility status may be disclosed to persons directly connected with the administration or enforcement of federal education programs, state education and health programs and federal, state and local means tested nutrition programs. However, these persons should **not** have routine access to participants' eligibility status. There must be a legitimate reason why the information is needed for the approved program.

The SFA must enter into a written agreement with other entities requesting the information prior to disclosing children's eligibility information. In all cases, the receiving entity **must** be informed in writing that:

- Eligibility information may only be used for the purpose for which the disclosure was made.
- Further use or disclosure to other parties is prohibited.
- A violation of this provision may result in a fine of not more than \$1,000 or imprisonment of not more than one year, or both.

Refer to the sample written agreement, Request for Information on Eligibility for Child Nutrition Program Benefits (Form 5-A) and related Policy on Confidentiality of Child Nutrition Program Benefits (Page 5-8).

### Requirements for Agreements On Disclosure of Eligibility Information

**Q-1** *What must be included in the agreement between the SFA and the entity requesting the eligibility information?*

- A** **All agreements must:**
- Be signed by both the SFA and the receiving entity.
  - Identify the entity receiving the information.
  - Specify that the information must be used **ONLY** for the purpose for which it was requested.
  - Describe the information to be disclosed and how it will be used.
  - Describe how the information will be protected from unauthorized uses and disclosures.
  - Describe the penalties for unauthorized disclosure.

### Disclosing Information to a Shared Custody or Non-Custodial Parent

- Q-2 *Can a shared custody or non-custodial parent obtain information provided by the custodial parent on his/her application for CNP benefits?*
- A No. The applicant’s consent, court order or subpoena is required before school officials can disclose that an application is on file or release the household’s eligibility information to anyone outside the household for non-program purposes.

### Disclosing Information for a Civic Cause

- Q-3 *May a school secretary who has access to the free and reduced-price eligibility information provide eligibility information or request confidentiality waivers from parents for a community wide “Adopt a Child” holiday gift exchange?*
- A No. Only the reviewing official may request waivers of confidentiality for programs other than those listed in the chart provided in this chapter. The school secretary has access to the free and reduced price data only because of her “need to know” for use in meal accountability. The waiver should be requested at the time of the initial application for benefits (either on the “Free and Reduced-Price School Meals Family Application” or on the “Waiver of Confidentiality for Free and Reduced Price Meal Eligibility Disclosures,” provided in [Chapter 3 – Policy Agreement](#)) or the reviewing official should initiate the request for the waiver.

## Parental Notification and Consent

### Disclosures That Do Not Require Parental Consent

SFAs must **inform** households if they plan to disclose or use eligibility information for authorized programs (see chart provided in this chapter), other than the CNP. The notice of potential disclosure is included in the “Letter to Households” (see [Chapter 3 – Policy Agreement](#)).

Although households must be notified, parental **consent** is not required prior to disclosing eligibility information due to a court order or subpoena or to any of the following programs:

- **Child Nutrition Programs** under the National School Lunch Act or Child Nutrition Act including the Summer Food Service Program, Special Milk Program, etc.
- **Comptroller General** of the United States for purposes of audit and examination.

## Chapter 5 – Confidentiality & Disclosure of Eligibility

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- **Federal, state, or local law enforcement officials** investigating alleged violations of any of the programs under the National School Lunch Act and Child Nutrition Act or investigating violations of any of the programs that are authorized to have access to names and eligibility status.
- **Federal education programs** such as the National Assessment of Educational Progress (NAEP), Twenty-First Century Community Grants, Upward Bound, E-Rate, No Child Left Behind and Title I, etc.
- **State education or health programs** (other than Medicaid or The Partners for Healthy Children) administered by the state or a local education agency.
- **Federal, state, or local means-tested nutrition programs** with eligibility standards comparable to the CNPs.

### Disclosures That Do Require Parental Consent

Parental consent (i.e. a waiver of confidentiality) is required prior to disclosing CNP eligibility information to the following programs:

- **Medicaid or The Partners for Healthy Children** (the state children’s health insurance program) administered by a state or local agency authorized under Titles XIX or XXI of the Social Security Act to identify and enroll eligible children.
- **Any other federal, state, or local program or individual not listed in the previous section**, even if the same person is responsible for approving eligibility for CNP benefits and awarding other benefits. Examples of such programs include free textbooks, reduced school fees, local charitable programs, etc.

The request for waiver of confidentiality **must** inform the parents/guardians that:

- They are not required to consent to the disclosure.
- The information will be used **only** for the purpose for which it is requested.
- Their decision will not affect their children’s eligibility for free or reduced-price CNP benefits.

Parents/guardians must consent to waive their confidentiality **prior** to disclosure and they should be given a reasonable amount of time to respond to the request.

### Waiver of Confidentiality Requirements

The request for parents to waive their confidentiality **must** be in writing. It may be obtained using the “Waiver of Confidentiality for Free and Reduced Price Meal Eligibility Disclosures” form provided in Chapter 3 – Policy Agreement.

Enter the names of the entities requesting eligibility information as well as the name and title of the school official in the spaces provided before printing the letter. Do **not** mark the checkboxes before printing. The parent or guardian of the student must mark each checkbox to confirm that they waive confidentiality (i.e. give the SFA permission to share their eligibility information with the entities indicated).

### Requirements for the Waiver of Confidentiality

Q-4 *What must be included in the Waiver of Confidentiality?*

A The Waiver of Confidentiality must:

- Identify the information that will be shared and how the information will be used.
- Be signed and dated by the **parent or guardian** of the applicant household.
- State that failing to sign the Waiver of Confidentiality will not affect eligibility or participation in the program and that the information will not be shared by the receiving program with any other entity or program.
- Enable the parent/guardian/adult to waive confidentiality for only those programs with which he or she wishes to share information.

## **Policy on Confidentiality of Eligibility Information for Child Nutrition Program Benefits**

The National School Lunch Act protects the confidentiality rights of participants. Disclosure of eligibility information about participants beyond that authorized by Public Law 103-448 and Public Law 105-336 is a criminal act punishable by a fine of not more than \$1,000 or imprisonment of not more than one year, or both.

Section 108 of Public Law 105-336 authorizes limited disclosure of student free/reduced-price Child Nutrition Program benefit eligibility status to persons who are directly responsible for the administration or enforcement of the following programs:

1. Federal education programs such as Title I and National Assessment of Education Progress.
2. State health or state education programs such as Quality Performance Accreditation (QPA) and "At Risk" state funding. The programs must be established by a state agency and administered by a state or local agency.
3. Federal, state or local means-tested nutrition programs with eligibility standards comparable to the National School Lunch Program (i.e. assist households with income at or below 185 percent of the federal poverty level, such as the Food Assistance Program or state or local nutrition program).

Applications for Child Nutrition Benefits **are not** part of a student's educational records under the Family Education Rights and Privacy Act (FERPA), because FERPA does not govern the administration of the Child Nutrition Programs. Therefore, free and reduced-price Child Nutrition Program benefit information cannot be released with other educational records.

The limitations apply to all Child Nutrition Programs and to all eligibility information regardless of the manner in which the information is maintained including, but not limited to, print tape, microfilm, microfiche and electronic communication.

Applications and other eligibility information on individual students may be released upon presentation of a subpoena or other court order.

Applications and rosters of eligible students should **never** be faxed. Faxing does not protect the confidentiality of the information.

To request students' free and reduced-price meal eligibility status, complete the attached Request for Information on Eligibility for Child Nutrition Program Benefits form. No information will be provided without this completed form. The Authorized Representative for the Child Nutrition Program is the only person authorized to grant the release of this information.

## Request for Information on Eligibility for Child Nutrition Programs

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

Person Requesting Information: Name: \_\_\_\_\_

Title: \_\_\_\_\_

School or Site: \_\_\_\_\_

This request for student names and Child Nutrition Program eligibility status (i.e. free/reduced-price status) is for the purpose of:

- Title I
- National Assessment of Education Progress
- Quality Performance Accreditation
- \_\_\_\_\_
- \_\_\_\_\_

If others must view this list, list their names and purposes (e.g. John Doe, data processing).

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I understand that Section 108 of Public Law 103-448 allows release of student name and eligibility status to me **only** for the purpose of **direct** administration or enforcement of the program(s) indicated above. I will not use this information for any other purpose, nor duplicate this list. I will keep this list in a secured location during its use and dispose of it in an appropriate manner when the information is no longer needed. I understand disclosure of eligibility information about participants beyond that authorized by Public Law 103-448 is a criminal act punishable by a fine of not more than \$1000 or imprisonment of not more than one year, or both.

Signed \_\_\_\_\_

### SCHOOL FOOD SERVICE OFFICE USE ONLY:

I authorize \_\_\_\_\_ to have a copy of the free/reduced-price eligibility list for the following school(s) or site(s) \_\_\_\_\_

Date Request Received: \_\_\_\_\_ Date List(s) Sent: \_\_\_\_\_

Signature of Authorized Representative: \_\_\_\_\_

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Keith Ringer and Walter Caudle  
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# Chapter 6 – Meal Service Policies

## Equal Access for All Students

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 made available to all students, those items may not be counted toward reimbursable meals.

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

- Students are not denied meals as a 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 would be identified as prior to 10 a.m. Districts are encouraged to allow students to eat breakfast when they are late arriving at school. However, this is not a requirement.

### Lunch

Regulations for the National School Lunch Program (NSLP) require that lunch be served between 10 a.m. and 2 p.m.

### 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 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 needs to routinely serve 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. Approvals will be granted 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, the following guidelines should be considered:

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 for students to be served from the time they begin waiting in line until they are seated at the table.
4. Provide students adequate time to eat.

**Lunch:** A minimum of 15 to 20 minutes from the time a student is seated until they leave the food service 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 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 food service area is recommended.

5. Allow students 1-2 minutes to clean up and prepare to return to the classroom or go to recess.

### 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.

Students being disciplined may be seated 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. Disciplinary action which indirectly results in the loss of meals is allowable (for example, a student is suspended from school).

**Policies Related to In-School Suspension (ISS)**

Q-1 *May students in a disciplinary setting such as ISS be required to bring a lunch from home?*

A No. If the site participates in the National School Lunch Program (NSLP), enrolled students attending classes 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.



Q-2 *Is the school required to provide a breakfast for students in ISS?*

A Yes. 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 provide breakfast.



Q-3 *May students in ISS units be provided a lunch that is different than the meal served to students in the cafeteria?*

A Yes, but if the meal is to be claimed for reimbursement, it must meet all meal pattern requirements.



Q-4 *May students in an ISS unit be required to eat in a different location or at a different time from other students?*

A Yes, 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

## Chapter 6 – Meal Service Policies

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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. As the student is served, the student's name may be looked up on the electronic accountability system or the student's name may be 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-type 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 manually entered 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 being 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

Schools are not required to serve students who receive reduced-price or full-price meals that do not have money to pay. In some SFAs, no accommodations are made by the SFA for feeding the student with no money. However, the following methods are commonly and successfully employed by SFAs throughout the state.

#### 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 a meal which can be claimed for a section 4 (paid) reimbursement or (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

Other SFAs desiring to provide a controlled method for limited charges involve the principal's office in the process. Often the student must go to the office where he/she is given a note which is exchanged on the serving line for a meal. At the end of the day, the cashier exchanges the note in the office for cash. This method removes Child Nutrition Program personnel from accounting and collecting for charged meals. Also, a student who may have a problem with a

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parent or guardian providing meals may be aided by the administrative staff 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 through these programs 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 Sack 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.

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

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1. The sack lunch must meet 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 being served.
2. The sack 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 checked as students are served the sack lunch. The roster is returned to the lunch accountability staff person following the service of the meal. Based on the checked roster, the number of sack lunches served is added to the school's lunch counts for the day.
4. Foods of minimal nutritional value (FMNV) may **not** be served as part of the sack lunch. FMNV, as defined by USDA regulations, include carbonated beverages, water ices, chewing gum and certain candies. Refer to Chapter 22 – Competitive Foods Policy provided in this *Program Reference Manual* for more information on FMNV.
5. 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.
6. The sack lunches must be served between 10 a.m. and 2 p.m.

### Examples of Reimbursable Sack Lunch Menus

Peanut Butter and Jelly Sandwich	Ham and Cheese Sandwich*
Chips	(Mayonnaise and mustard in individual portion package)
Pre-portioned Juice	Chips
Whole Banana	Carrot and Celery Sticks
Cookie	Whole Apple
Milk*	Cookie
	Milk*

\*Potentially Hazardous Food

## Kindergarten and Pre-Kindergarten Programs

The SBP and NSLP may be operated 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. Refer to the appropriate sections in Chapter 19 for information on lunch menu planning requirements and to Chapter 24 – School Breakfast Program for information on breakfast menu planning requirements. 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. Also, 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. Also if additional foods not offered as part of the meal are selected, a la carte/special sales prices should be charged for those items.

#### Important Point!

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.

#### A la Carte/Special Sales

**Q-6** *May a la carte/special sales items be grouped and totaled to equal the price charged for a full-price lunch or breakfast and claimed for reimbursement? An example would be 4 juices at \$0.50 = \$2.00 (the price of the lunch), or 5 milks at \$0.25 = \$1.25 (the price of the breakfast).*

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

#### 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 services 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.

### Price of Salads

Q-7 *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.

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 share attention 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 determine whether a waiver may be required and to ensure adequate meal accountability procedures are developed.
- Train teachers, staff, parents and students on proper hand washing, food handling and meal accountability.

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- Establish ongoing food safety procedures in collaboration with local health sanitarians. 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 Department of Health and Environmental Control “permitted” commercial establishments may be utilized in the SBP and NSLP.

## Notification of Ticket/Card Replacement

Delete this text and title. Print on SFA letterhead or insert name, address and telephone number of school/SFA.

<Date>

Dear Parent/Guardian:

Your student, <student's name>, has been issued three replacement tickets/cards this school year because the originally issued tickets/cards were lost, stolen, misused or damaged. These tickets/cards have been provided at no charge to the student. However, if the above student requires an additional replacement ticket/card for the remainder of the school year, he/she will be required to pay \$<cost of replacement ticket> for a replacement ticket/card, or pay \$<paid lunch cost> for lunch or \$<paid breakfast cost> for breakfast.

This policy was provided to all students/parents at the beginning of the school year, and a copy is attached for your reference.

We appreciate your cooperation in ensuring that students treat meal tickets/cards in a responsible manner. Questions can be addressed to:

<Contact Name>  
<School Address>  
<Phone>

Sincerely,

<Signature>

<Name>  
<Title>

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly.** "The U.S. Department of Agriculture (USDA) prohibits Discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

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

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

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# Chapter 7 - Meal Pricing

## Reimbursement Rates

The reimbursement rates for the National School Lunch, School Breakfast, Special Milk and Afterschool Snack Programs are announced annually (usually late July) by the U.S. Department of Agriculture (USDA) and are effective from July 1 through June 30. Rate information (to include USDA Commodity Assistance) is transmitted to all participating School Food Authorities (SFA) via e-mail memorandum and is automatically updated in the South Carolina Automated Payment System (SCAPS) for claims purposes. For additional information, contact the South Carolina Department of Education (SCDE) Office of Nutrition Programs at (803) 734-8188.

## Pricing Student Meals

USDA guidelines require that all reimbursable meals be priced as a unit. In addition, the “Offer versus Serve” provision cannot affect the meal price. Regardless of the items chosen, the student must pay the established reduced-price or full meal charge, as appropriate. Students eligible for free meals pay nothing.

### Reduced-Price Charge

School Food Authorities (SFAs) are required to offer both free and reduced-price meals unless a school serves all meals without charge and/or operates under Provision 2. (See Chapter 10 – Special Assistance Provisions for additional information.) The reduced-price meal charge cannot exceed 40 cents for lunch, 30 cents for breakfast or 15 cents for an afterschool snack. The reduced-price meal charge must be less than the full price meal charge.

An SFA may choose to vary prices between high schools, middle schools, and elementary schools; however, the maximum charge can't exceed the maximum amounts specified in the previous paragraph.

### Paid Meal Equity

Pursuant to USDA guidelines, lunch prices for full-pay children must cover the total cost of the meals. Revenue from these meals can't be subsidized by USDA reimbursement or other CNP funds. Refer to the latest USDA guidance on how to calculate the minimum price.

### Choice of Lunches

Schools may offer students a choice of reimbursable lunches. The school may establish different unit prices for each type of lunch served provided that the benefits made available to students eligible for free or reduced-price meals are not affected. For example, if the school offers a “super” lunch with larger servings of meat/meat alternate or other premium items, the “super” lunch must be available to the free and reduced-price participants at no additional charge if these meals are to be claimed for reimbursement.

### Fees for Lunch Services

Students must not be charged for any additional fees for supervisory or other services provided in conjunction with the meal programs.

### Pricing Adult Meals

The benefits of the National School Lunch and School Breakfast Programs are for children only. The reimbursement and commodities are based on the number of lunches and breakfasts served to students. No reimbursement or commodities are provided for adult meals.

To ensure that children's payments or federal reimbursement for children's meals are not used to subsidize the payment of an adult meal, SFAs must charge no less than the minimum amounts established by SCDE for adult meals, plus applicable state and local sales and/or prepared food taxes. These minimum amounts are provided by SCDE along with the reimbursement rates each year.

### Determining the Minimum Price for an Adult Meal

SFAs may choose to establish higher adult meal prices but may not charge adult prices less than those established by SCDE. If a SFA prefers to establish their own adult meal price (i.e. one that is higher than SCDE's), one of the methods described below must be used. This will ensure that the student programs are not financially hampered by adult participation. SCDE uses Method 1 to establish the minimum required adult meal prices.

**Method 1:**     **Lunch** - Add the rate of federal reimbursement for a free student lunch to the per meal value of USDA commodity assistance plus state sales tax.

**Breakfast** - Charge the rate of federal reimbursement for a free student breakfast plus state sales tax.

**Method 2:**     **Lunch** - Cost out food, labor, supplies, and miscellaneous expenses attributed to providing an adult meal, accounting for the value of the commodities and portions actually served to adults. State sales tax must be added to the price set for adult meals.

**Breakfast** - Cost out meal as described above and add state sales tax.

**Method 3:**     In place of unit pricing an adult meal, meal items may be sold to adults on an a la carte basis. Keep in mind that a la carte pricing must equal or exceed the minimum adult meal price for the same combination of items.

Note: When calculating adult meal prices using these methods, school officials are encouraged to include the two-cent supplemental payment for SFAs in the 60 percent or more free and reduced-price category as appropriate. Note that state and local sales tax must be paid on adult meals sold and must be added to the adult charge when establishing minimums. In addition, in some areas, local taxes are required to be paid on the sale of prepared foods.

### Adult Visitors

The charge to adult visitors (e.g. parents or grandparents eating with their child or grandchild), at the discretion of the SFA, may be higher than the charge paid by adult school employees.

### Child Nutrition Program Employees

At the discretion of the SFA, meals may be served at no charge to adults directly involved in the operation and administration of breakfast and lunch programs. This includes persons responsible for menu planning, purchasing, preparation, clean-up and service of the meals. The cost of such meals may be paid from program funds.

### Non-Child Nutrition Program SFA Employees

Income from sources other than federal reimbursement or children's payments must be used to pay for the cost of meals served to teachers, custodians or administrative personnel who are not involved in planning, preparation, clean-up or service of meals as described in the previous paragraph. SFAs are encouraged to charge these adults the established adult meal price (i.e. the minimum amount required and published annually by SCDE or a higher amount established by the SFA using one of the methods described earlier in this section).

### **Important!**

- In no case should the funds available to pay the cost of student meals be used to supplement the cost of adult meals.
- In no case should the funds available to pay the cost of adult meals be less than the actual cost of providing the meals.
- If meals are included as a fringe benefit or offered as part of the salary arrangement for non-Child Nutrition Program personnel, the SFA must transfer enough money from other funds to the food service account to pay the cost of these adult meals. An audit trail of this fund transfer must be documented.

### Explaining Adult Meal Prices to Employees

Table 7.1 – Pricing of School Lunch may be useful in explaining to SFA employees and others how the National School Lunch Program is funded and why adults must be charged a higher price than students for the same sized portion.

Please note: The reimbursement rates and the per meal value of the USDA commodity assistance used in the example provided are the maximums received for the school year. The price of \$1.50 used in the example for students in the paid category is simply a statewide estimated average. It is recommended that in order to adapt the chart for use in a particular SFA, the SFA's current student and adult prices be substituted.

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**Table 7.1 – Pricing of School Lunch**

	<b>Student Free</b>	<b>Student Reduced</b>	<b>Student Paid</b>	<b>Adult Paid</b>
Cash Received from Household	\$0.00	≤ \$0.40	\$1.50 <sup>a</sup>	\$1.75 <sup>b</sup>
Federal Reimbursement	\$2.93	\$2.53	\$0.28	\$0.00
USDA Commodity Assistance	\$0.23	\$0.23	\$0.23	\$0.00
<b>Total Revenue</b>	<b>\$3.16</b>	<b>≤ \$3.16</b>	<b>\$2.01</b>	<b>\$1.75</b>

<sup>a</sup> Estimated average price charged for student meals in the paid category in South Carolina schools in 2008

<sup>b</sup> Hypothetical price for adults

As you can see in Table 7.1, even though the adult is paying a cash price that is more than the paying student, the total revenue received for the adult meal is less than that received for the paying student's meal. It is also significantly less than the revenue received for the meal of a student who is receiving free or reduced-price meal benefits.

Unless the SFA is supplementing the adult meal price from local funds (approximately \$1.41 per meal in the example shown here), the SFA would be required to raise the adult meal price to at least the minimum amount established annually by SCDE. This would prevent the adult participation from financially hampering the students' programs.

Keep in mind that the total revenue collected for adult meals must not only be enough to cover the costs associated with producing student meals (food, labor, supplies and miscellaneous expenses), it must also cover the state sales tax and any additional local taxes that may be required for the sale of prepared food.

More reasonable lunch prices would be \$2.25 per student in the paid category (bringing total revenue for a paid lunch to \$2.76) and the required minimum of \$3.40 for adult lunches (assuming the portion sizes are the same as those offered for students).

### **Pricing A la Carte and Other Special Items**

USDA guidelines require that prices of a la carte and other special items should be set to cover the total food, labor, direct and indirect costs for producing each item. When pricing items for a la carte and other special sales, price healthy foods (i.e. milk, fruit) at a relatively low cost to encourage consumption of these items. For other items, set prices close to what competitive retail outlets charge. Reimbursable meals should be priced lower than the total of the a la carte prices for the same menu items.

### **Needy Children Who Are Not Eligible for Free or Reduced-Price Meal Benefits**

A fund may be established to cover the cost of meals for needy students who may not be eligible for free or reduced-price meals; or who refuse to accept free or reduced-price meal benefits; or who fail or complete an application or provide Direct Certification documentation. Principals or Parent Teacher Associations/Organizations may choose to establish such a fund by collecting contributions from civic groups or individuals.

### Meal Charging Policy

SFAs are encouraged to establish their own procedures for allowing students to charge meals. Charge policies may vary by grade level. SFAs must inform students and their parents/guardians of the charge policy through student handbooks, school newsletters, enrollment materials, and the reverse side of the menu calendar or other written communication.

If a student in the reduced-price or paid category has charged meals in excess of the SFA's established policy, the student may be required to pay for the meal prior to being served.

A student in the free eligibility category may not be denied a reimbursable free meal, regardless of the number of "charges" the student has made in the past. For example, a student may have accumulated excessive a la carte charges or meal charges prior to being approved for free meals. Once approved for free meals, the student must be allowed to eat the reimbursable meal at no charge.

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# Chapter 8 – Use of Child Nutrition Program Funds

## Food Service Account

The Office of Nutrition Programs at the South Carolina Department of Education (SCDE) recommends that School Food Authorities (SFAs) establish a separate food service account consisting of all money deposited or transferred for the operation of the Child Nutrition Program (CNP). However, if SFAs choose not to establish a separate food service account, the SFA must have an accounting system in place to identify all food service revenues and expenditures throughout each school year.

CNP funds are required to comply with generally accepted accounting principles, including the annual budgeting process. However, the following provisions of the CNPs differ from other funds, programs, and accounts:

- All revenues received by or accruing to the food service account must be used only for the operation and improvement of the CNP. Revenues include, but are not limited to, receipts from:
  - Operations of the lunch, breakfast, snack and milk programs;
  - A la carte sales, concessions and internal catering;
  - Earnings on investments;
  - Other local revenue; and
  - Federal meal reimbursement.

### Interest Income

**Q-1** *Must the interest earned on money from the food service account that has been invested be deposited in the food service account?*

**A** Yes. All revenue received by the CNP may be used only for the operation or improvement of the CNP. This includes earnings on investments. If CNP funds are used totally or in part for investment purposes then the interest earned from such investments must accrue to the food service account and be used only for authorized program purposes.

- Food service account funds may not be used for expenditures that are not directly related to the operation of the CNP although they are part of the SFA general fund.
- Any positive balance remaining in the food service account at the end of the school year must be carried over to the next school year as a beginning balance of the food service account.

## Chapter 8 – Use of Child Nutrition Program Funds

- To maintain the nonprofit status of the CNPs, the fund balance or net cash resources of the food service account must not exceed three months' average expenditures. If an excess balance should occur, the SFA must immediately take steps to reduce the balance or have an acceptable plan for using surplus revenues. The plan should be such that the balance would be reduced within a year. The plan must be submitted to the Office of Nutrition Programs, SCDE. Since program funds may be used only for program purposes, an excess balance could be reduced by improving the quality of food served; reducing the prices of meals served to students; or purchasing needed supplies, services or equipment.

To determine if an excessive balance exists, you may complete the following calculations: (See example in [Table 8.1 – Example of Excessive Balance Calculation](#).)

- The formula used is total expenditures for the school year divided by ten (10) times three (3) is compared to the net cash on hand at the end of the school year.

If the Comparison Amount is a negative figure, a plan to reduce the excessive balance must be submitted to SCDE. Use of the [Plan for Reducing Excessive Operating Balance](#) form (Form 8-A) is recommended.

**Table 8.1 – Example of Excessive Balance Calculation**

Net Cash Resources Calculation	
School Food Authority: Palmetto School District	School Year: 2012-2013
Expenditures	<b>\$559,431.13</b>
Adjusted Expenditures divided by 10 times 3 (maximum allowable balance amount)	\$167,829.33
Minus Cash Balance	\$190,187.71
Comparison Amount*	<b>&lt; \$22,358.38 &gt;</b>

\* A negative number represents the excess balance amount and a plan to reduce the balance must be submitted.

### Loans to the Food Service Account

The U. S. Department of Agriculture (USDA) has ruled that the SFA may not retroactively determine that funds transferred from the general fund to cover CNP deficits were a loan subject to repayment.

1. In order for a liability to exist, a bona fide loan agreement must be in effect at the time that the funds are transferred. This means that a fund transfer cannot be retroactively designated to be a loan. Documentation that the CNP incurred deficits in past years that were covered by local contributions is not sufficient to substantiate the claim that the funds were transferred with the intent that the money would be repaid.

## Chapter 8 – Use of Child Nutrition Program Funds

2. The conditions for repayment must be documented and agreed to by both parties, the general fund manager and the CNP, in advance. The agreement must be submitted to SCDE for approval.
3. Interest payments are not allowable program expenditures.
4. Short-term or multi-year obligations are permissible provided that a bona fide loan agreement exists at the time that funds are made available.

### Loans from the CNP to the SFA

**Q-2** *Can CNP funds be loaned to the SFA? If so, must interest be paid and at what rate?*

**A** Yes, CNP funds may be loaned to the SFA on a short-term basis (i.e. a school year). The SFA should pay interest at the prevailing loan rate. The loan agreement should contain such stipulations as the purpose, interest rate (simple or compounded), the repayment schedule for the principal and interest, and any penalties for late payment.



**Q-3** *If the CNP has purchased a Certificate of Deposit (CD), may it be cashed in before the maturity date in order to loan the money to the SFA?*

**A** Yes. However, the SFA must pay any penalties associated with this action. The payment of interest at current rates for CDs would be in order.



**Q-4** *What records must be maintained for loans to the SFA?*

**A** The original loan agreement, duly executed, and the payments for the principal and interest must be maintained and be on file for the duration of the loan plus the retention period required for all federal and state records.

### Expenditures

All CNP expenditures should be classified as food, labor, and other. Expenditures should be documented by itemized receipts or invoices. To be allowable, expenditures must be necessary and reasonable for proper and efficient administration of the programs and conform to any limitations or exclusions set forth in program regulations.

The types of allowable and non-allowable expenditures that may be made by SFAs operating the CNPs under the National School Lunch Act are listed below. For specific expenditures not listed or for further interpretation of those listed, contact SCDE.

### Allowable Expenditures

- Food purchases and costs directly related to the storage, handling, processing, and transportation of food.
- Labor, which includes payments for labor and other services directly related to operating the CNPs - This includes the employer's share of retirement, social security, insurance payments, bonuses and fringe benefits after the state allocation to the district has been exhausted.
- Other supplies and expendable equipment (under \$5,000) used directly in the operation of the CNP - This includes items that must be replaced from time to time such as pots and pans, serving trays, dishes, glassware, silverware, linen, mops, brooms, cleaning supplies, etc.
- Non-expendable items (over \$5,000), generally classified as movable property and used directly in preparing, storing or serving school meals - This includes ranges, refrigerators, freezers, steam tables, mixers, storage cabinets, tables, chairs, hot water heaters, and other equipment. This category may also include such items as charges for installing and connecting equipment to utilities in the building in which the program is operated, as well as service for maintenance and repair of equipment. Note: When food service account funds will be used to purchase equipment costing more than \$5,000 per unit for new construction, permission must first be obtained from SCDE. The form entitled, "Request to Purchase New Equipment" (Form 8-B) provided at the end of this chapter should be used to make the request.
- Training of CNP employees.
- Travel on CNP business such as workshops, conferences, and training programs.
- Memberships, subscriptions, books, and audiovisual equipment used to benefit the CNP.
- Rental of food storage facilities or equipment as required for program needs.
- Computers, cash registers, adding machines, typewriters, communication equipment, and other office equipment used exclusively for the operation of the CNP.
- Printing and reproduction equipment or services.
- Employee information publications.
- Automotive equipment used exclusively in transporting food for program purposes.
- Services, when actual costs attributable to the CNP are billed separately such as pest control, trash removal, security, and janitorial – If the invoice does not specifically identify the actual costs attributable to the CNP, the expenditure must be categorized as an indirect cost.
- Utilities, when actual costs attributable to the CNP are billed using separate meters – If the invoice does not specifically identify the actual costs attributable to the CNP, the expenditure must be categorized as an indirect cost.

## Chapter 8 – Use of Child Nutrition Program Funds

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- Advertising for the recruitment of personnel, for the solicitation of bids for the procurement of goods and services required, and for the disposal of scrap or surplus materials.
- Promotional materials and exhibits relating specifically to the program and to advisory councils related to parental and student involvement.
- Indirect costs for the current school year at the assigned indirect cost rate for the school district.

### Prorating a Secretary's Wage

**Q-5** *May a prorated part of a school secretary's wages be paid from the food service fund?*

**A** Yes, under certain circumstances. It is allowable to charge the CNP for wages and fringe benefits for a secretary who does lunchroom accountability if records are maintained of the time actually spent on the CNP. For example, if the school secretary spends from 11 AM to 1 PM each day as the cashier in the dining room, the wages for those two hours may be charged to the food service account.

### Paying for Awards Dinner

**Q-6** *Is it allowable to use nonprofit CNP funds to pay for an awards dinner at a local restaurant to recognize the achievements of CNP staff in areas such as increased participation, expanded nutritional information and education, or increased productivity?*

**A** Yes, under certain circumstances. In order to use CNP funds for activities as described above, certain criteria must be met. The activity must be part of the SFA's established practice, be reasonable and necessary, and be consistent with regulations, policies and procedures that apply uniformly to both federally assisted and other activities of the SFA (be consistent with the use of local funds).

### Paying Publishing Fees

- Q-7** *May food service funds be used to pay for publishing the free and reduced-price guidelines (for example, in the local newspaper) at the beginning of the school year?*
- A** Yes. However, this should not be required because the SFA's responsibility is fulfilled by disseminating the press release with the guidelines to the media as a public service announcement. The SFA does not have to pay to have this published unless the local newspaper refuses to honor the SFA's request.

### Non-allowable Expenditures

- No income accruing to the CNP may be used to purchase land, acquire or construct buildings, or make alterations to existing buildings that materially increase the value of capital assets - However, paint and decorator items would not be considered capital expenditures. Only those improvements that materially increase the value or life of the building would be considered capital expenditures.
- Contributions and donations.
- Entertainment, amusements, social activities, gratuities, and related activities.
- Interest on loans.
- Rent or usage fees for district-owned facilities.
- Cafeteria monitors –CNP funds may not be used to pay salaries for monitoring. However, CNP personnel may have monitoring duties assigned to them as part of their other food service responsibilities.
- Custodian and maintenance costs which are already included in the district's formula for indirect cost.
- Indirect cost expenses from prior year(s), and/or those that exceed the assigned rate.
- Any direct costs that are included in the indirect cost rate approved for the CNP.

### Charging Rent

- Q-8** *Can a SFA charge the food service account rent or usage fees for cafeterias, kitchens, or storage facilities?*
- A** No. The SFA is not allowed to charge rent to the CNP for SFA-owned facilities. However, the SFA can recover indirect costs that occur as a result of operating the CNP.

### Bad Checks

**Q-9** *If a parent issues a bad check, may the student’s meal account be charged for the fee?*

**A** No. The student’s “meal money” (i.e. money paid by the household to the school with the intent and understanding that it is to pay for meals) should **not** be used to pay the bank service fee. A SFA may refuse to extend credit for meals under whatever circumstances it deems appropriate. The SFA may request that the parent reimburse the CNP fund for the bank service charge with funds other than those sent for payment of meals.

### Adult Visitors

**Q-10** *Can food service funds be used to provide meals for adult visitors attending a meeting in the SFA or to purchase meals in a commercial restaurant for the visitors?*

**A** No. CNP funds are to be used to provide meals for children. Adults should pay a sufficient price to cover the cost of their meals. If adults are not charged for their meals, the CNP fund must be reimbursed for each meal from another fund. The amount of reimbursement must be more than or equal to the current year’s student free reimbursement rate for each meal.

### Special Dinners for Adults

**Q-11** *When the school board hosts a special dinner for employees, must the food service fund be reimbursed for food, supplies, and labor?*

**A** Yes. The CNP fund must be fairly reimbursed for **all** costs associated with serving meals or food to adults. The source of the payment (for example, general fund or an activity fund) must be clearly indicated.

### Indirect Costs for Child Nutrition Programs

Indirect costs are not readily identified with a specific program. These costs are incurred by a SFA for the benefit of all programs. SFAs are allowed to recover food service related indirect costs for general administration, utilities, custodial services, etc.

An indirect cost rate is used to determine the maximum amount of indirect costs each federal program should bear. The rates for public school districts are calculated annually by SCDE and are entered in the South Carolina Accounting and Claiming System (SCAPS) for each district.

Indirect costs are limited to the SFA’s indirect cost rate multiplied by specific direct costs.

### Indirect Costs

**Q-12** *Is a SFA required to pay the maximum indirect costs of the program from the food service fund?*

**A** No. The SFA may permit the CNP to reimburse the SFA less than the maximum amount allowed. Indirect costs paid from the CNP fund cannot exceed the maximum allowable indirect costs based on the indirect cost rate.



**Q-13** *When is a labor expenditure considered a direct cost and when is it considered an indirect cost?*

**A** A labor expenditure can be recorded as a direct cost only when there is actual supporting documentation of the time spent on the CNP. Estimation or allocation of time worked (for example 10% of work time) in the CNP is not acceptable. Indirect labor costs include custodians, secretaries and other supplemental services. Generally, these employees spend only a portion of their work hours completing food service tasks.

### Custodian's Wages

**Q-14** *If a SFA employs a custodian that works exclusively for the CNP, may that custodian's salary be reported as a direct labor expenditure rather than an indirect expenditure?*

**A** No. Custodians are included in the indirect cost rate computation and they cannot be charged to the CNP fund as a direct cost. The custodian's wages may be paid from the CNP fund and reported as an indirect expenditure as long as the total indirect costs do not exceed the computed indirect cost limitation.

### Demonstrating Compliance

Federal regulations (7 CFR 210.14) require SFAs to submit forms and reports to SCDE as appropriate to demonstrate compliance with CNP requirements. SCDE requires SFAs to comply with this regulation by completing the Revenues and Expenses Report in SCAPS once a year.

### Procedures for Completing “Plan for Reducing Excessive Operating Balance” Form

When food service funds exceed three months average expenditures as contained in 7CFR 210.9(2), the School Food Authority (SFA) must complete the Plan for Reducing Excessive Operating Balance” form and submit it to the State Agency (SA). The completed form must contain a plan on how the excess balance will be spent in order to maintain the Program’s non-profit status.

The following procedures must be followed for completion and implementation of the “Plan for Reducing Excessive Operating Balance” form.

1. The SA accountant will determine through SCAPS at the end of the school year that an SFA’s food service net cash resources exceed three months operating balance as required in Subpart C, 7CFR 210.9(2).
2. The SA accountant will notify SFA and copy the assigned SA Education Associate that a “Plan for Reducing Excessive Operating Balance” form must be completed by the SFA and submitted to the attention of the Director in the Office of Nutrition Programs. The Director or his/her designee will approve the plan or may deny the plan and will send it back to the SFA with a copy forwarded to the assigned Education Associate. If the plan is denied, an explanation for denying the plan will be sent back to the SFA and a revised plan must be resubmitted. The plan must be completed within 12 months (1 year) from the date of submission unless prior written approval is received from the State Director.
3. When the approved date for plan completion is reached, the assigned Education Associate will conduct an on-site review to verify all aspects of the completed plan have been completed and acknowledge by signing the form.
4. The completed form will be forwarded to the SA Director for final approval and all related records will be maintained by the SA. The SA Director will remit a letter notifying the SFA that the plan has been completed.
5. **Failure to complete the plan in the approved timeframe may result in food service funds being retained by the SA. Any changes to the approved plan or completion date must be approved by the SA prior to executing them.**

## Chapter 8 – Use of Child Nutrition Program Funds

### Plan for Reducing Excessive Operating Balance

Form 8-A

**Instructions:** When food service funds exceed three months operating expenditures, complete this form to explain how the excess balance will be spent in order to maintain the Program's non-profit status. Submit the completed form to the South Carolina Department of Education (SCDE), Office of Nutrition Programs, 1429 Senate Street, Rutledge Office Building Room 700, Columbia, SC 29201.

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

School Food Authority (SFA): \_\_\_\_\_

SFA Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone #: \_\_\_\_\_ Fax #: \_\_\_\_\_

Contact Person's Name: \_\_\_\_\_ Title: \_\_\_\_\_

(1) Cash Balance End of Year \$ \_\_\_\_\_

(2) Total Yearly Expenditure divided by 10 times 3) = \$ \_\_\_\_\_

(3) Amount of funds to be reduced (#1 minus #2) = \$ \_\_\_\_\_

Briefly Outline Plan (Please complete page two or attach Plan)

The above named SFA herein submits the following plan to reduce the excessive operating food service balance. This plan will be completed by \_\_\_\_\_, 20 \_\_\_\_.

Printed Name of SFA Authorized Representative: \_\_\_\_\_

Signature of SFA Authorized Representative: \_\_\_\_\_

#### FOR USE BY SCDE ONLY:

\_\_\_\_\_ **Approved** \_\_\_\_\_ **Denied (Justification):** \_\_\_\_\_

\_\_\_\_\_  
**Name & Title of SCDE Official**

\_\_\_\_\_  
**Signature and Date of SCDE Official**

**On-Site Review and Verification of Completed Plan:**

\_\_\_\_\_  
**Signature of Education Associate**

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

**Final Approval of Completed Plan:**

\_\_\_\_\_  
**Director, Office of Nutrition Programs**

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

**Briefly Explain Plan for Reducing Excessive Operating Balance:**

## Chapter 8 – Use of Child Nutrition Program Funds

### Request to Purchase New Equipment

### Form 8-B

**Instructions:** Prior to purchasing equipment costing more than \$5,000 per unit for new construction with Child Nutrition Program funds, obtain permission by completing and mailing this form to South Carolina Department of Education (SCDE), Office of Nutrition Programs, 1429 Senate Street, Rutledge Office Building Room 700, Columbia, SC 29201 or faxing to: (803) 737-4148.

Date: \_\_\_\_\_ School Food Authority (SFA) Name: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax: \_\_\_\_\_

Contact Person's Name: \_\_\_\_\_ Title: \_\_\_\_\_

List Equipment to be Purchased\*:

Estimated Cost of Each Item:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.
- 7.
- 8.
- 9.
- 10.

Name of Building in Which Equipment Is to be Used: \_\_\_\_\_

Type of Building (e.g. elementary school, central kitchen): \_\_\_\_\_

Approximate Number of Children Fed by This Facility: \_\_\_\_\_ % Free/Reduced: \_\_\_\_\_

\_\_\_\_\_  
Printed Name of Authorized Representative

\_\_\_\_\_  
Signature of Authorized Representative

\* Use additional paper if needed

#### FOR USE BY SCDE ONLY:

Approved

Denied

\_\_\_\_\_  
Name of SCDE State Office Director

\_\_\_\_\_  
Signature of SCDE State Office Director

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Keith Ringer  
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# **Chapter 9 – SCAPS FINANCIAL REPORT**

## **South Carolina Automated Payment System (SCAPS)**

All School Food Authorities (SFAs) in South Carolina have access to an online system for reporting revenues and expenses. This system is called the South Carolina Automated Payment System (SCAPS). Each SFA is required to input their revenues and expenses into SCAPS annually.

### **Allowable Use of Funds**

Child Nutrition Program (CNP) funds are subject to audit and have prescribed limitations on how such funds may be used and maintained. Revenues received by the nonprofit CNP must be used solely for the operation or improvement of the CNP department.

### **Revenues**

Revenues are defined as all monies received by or accruing to the nonprofit CNP including but not limited to student payments, earnings on investments, other local revenues, state revenues, and federal reimbursements.

### **Maintaining Nonprofit Status**

Regulations also require that the program remain nonprofit. The South Carolina Department of Education (SCDE) is required to monitor the operating balance for each SFA to ensure that it does not exceed three operating months or three months' expenditures.

### **Operating Balance**

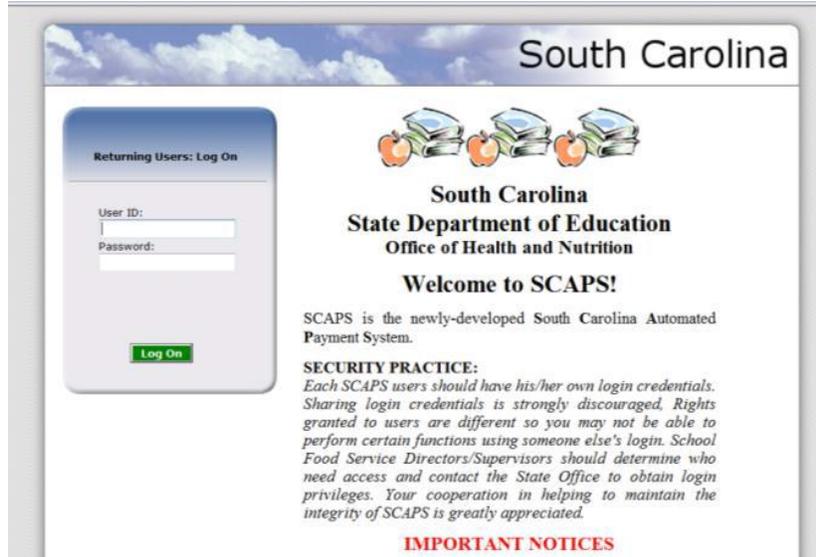
An operating balance is defined as all monies that are available to or have accrued to a SFA's nonprofit CNP at any given time, less payables.

SCAPS automatically monitors nonprofit status through the SFA's Revenue and Expenses submission on an annual basis. If the three-month limit is exceeded, the SFA is notified and plans for the use of such excesses must be initiated or excessive balances returned to the U. S. Department of Agriculture (USDA).

### Access the South Carolina Automated Payment System (SCAPS)

Access the SCAPS website as you normally would for regular transactions:

<https://scaps.cnpus.com/scdoe/Splash.aspx>



Enter your user ID (e-mail address) and password.

Click on "Application."



## Chapter 9 – SCAPS Financial Report

Select “Financial Report.”



Item	Description
SFA Manager	SNP SFA's Profile, Site and Hold Information
Application Packet	Applications Forms (SFA and Site)
Verification Report	Mandatory Annual Verification Report
Verification Summary	Mandatory Annual Verification Report Summary
Food Safety Inspections	Number of Food Safety Inspections by Site
Food Safety Inspections Summary	Number of Food Safety Inspections by Site Summary
Annual Audits	Annual Audits
Annual Audit Status Summary	Annual Audit Status Summary
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview
FFVP Grant Allocations	Fresh Fruit and Vegetable Program Grant Allocations
FFVP Invitations and Approvals	Fresh Fruit and Vegetable Program Invitations and Approvals
Financial Report	School Food Annual Revenues and Expenditures Report
Financial Report Summary	School Food Annual Revenues and Expenditures Report Summary
Site Enrollment	Site Enrollment and Eligibility
Direct Certification	Direct Certification List and Individual Student Lookup
Download Forms	Forms Available for Downloading

### Explanation of SCAPS Revenue & Expenses Screens

The following revenue and expense items are defined and appropriately linked to the General Ledger as maintained in local school districts. The order and sequence of items reflects the SCAPS application as it is currently designed screen by screen.

Although chart of accounts references\* pertain strictly to public schools, the data requested is generic to all SFAs operating school meal programs. To the extent revenue and expense data is available; this information must be input into the SCAPS application beginning July 1 but no later than January 31<sup>st</sup>. This allows for SCDE to monitor the financial status and reporting as required for the federally-funded meal programs on an annual basis. SCDE is not only responsible for monitoring use of funds and nonprofit status but for the overall prudent management of school meal programs and assurance of a certain level of service delivery to the student customer.

\* Note that all “Chart of Accounts” references reflect the 2012-2013 Accounting Handbook Update issued July 1, 2012.

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen under Revenue & Expenses – REVENUE Section

Version: 1

1. Contact Name:	Salutation	First Name	Last Name
2. Title:			
3. Email Address:			
4. Phone:	Ext:	Fax:	

**Reporting Period**

Reporting Period: July 01, 2012 to June 30, 2013

**Revenue**

	Account	Description	Amount
5.	1500	Earnings on Investments	\$0.00
6.	1610	Lunch Sales to Students	\$0.00
7.	1620	Breakfast Sales to Students	\$0.00
8.	1630	Special Sales to Students	\$0.00
9.	1640	Lunch Sales to Adults	\$0.00
10.	1650	Breakfast Sales to Adults	\$0.00
11.	1660	Special Sales to Adults	\$0.00
12.	1950	Refund Prior Years Expenditure	\$0.00
13.	1960	Transfer from Other Funds	\$0.00
14.	1900	Other - Local Revenue	\$0.00
15.	1610	Afterschool Snack Sales to Students	\$0.00
16.	1999	Catering	\$0.00
17.	1992	Canteen Operations	\$0.00
18.	2000	Local Appropriations	\$0.00
19.	3142	State Funds	\$0.00
20.	4800	USDA Reimbursement (SNP + ASP + FFVP)	\$0.00
21.	4999	Other Federal Revenue	\$0.00
22.	4991	USDA Commodities	\$0.00
		<b>Total Revenue</b>	<b>\$0.00</b>

## Chapter 9 – SCAPS Financial Report

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1500	<b>Earnings on Investments</b>	Includes (1) interest received on temporary or permanent investments in United States Treasury bills, notes, bonds; savings accounts; time certificates of deposit; notes; mortgages; or other interest-bearing obligations, (2) dividends received on stocks, and (3) gain or loss on sale of investments.
1510	Interest on Investments	
1520	Dividends on Investments	
1530	Gains or Losses on Sale of Investments	
1610	<b>Lunch Sales to Students</b>	Income received from sale of lunches to students
1620	<b>Breakfast Sales to Students</b>	Income received from sale of breakfasts to students
1630	<b>Special Sales to Students</b>	Income received from sale of extra food items to students including milk and all a la carte activity
1640	<b>Lunch Sales to Adults</b>	Income received from sale of lunches to adults
1650	<b>Breakfast Sales to Adults</b>	Income received from the sale of breakfasts to adults
1660	<b>Special Sales to Adults</b>	Income received from sale of extra food items to adults
1950	<b>Refund Prior Year's Expenditure</b>	Money received in refund of expenditure charged to a prior fiscal year's budget. A refund of expenditure made in the same fiscal year budget would be recorded in the appropriate expenditure account as a reduction of the expenditure.
1960	<b>Transfer from Other Funds</b>	Money received unconditionally from other funds without expectation of repayment.
1900	<b>Other – Local Revenue</b>	
1910	Rental	Money received from the rental of school property, real or personal - It does not include rental from real property held for income purposes; this income is recorded under 1500 Earnings on Investments.
1920	Contributions and Donations from Private Sources	Money received from a philanthropic foundation, private individuals, or private organizations for which no repayment or special service to the contributor is expected
5300	Sale of Fixed Assets	Revenue from the sale of school property or realized from loss recoveries of school property
1999	Miscellaneous- Catering	Other revenue from local sources not covered in listed or identified revenue accounts
1992	Canteen Operations	Money received from canteen operations managed and administered by the CNP
1993	Receipt of Insurance Proceeds	
1994	Receipt of Legal Settlements	
1610	<b>Afterschool Snack Sales To Students</b>	Money received from sale of afterschool snacks to students

## Chapter 9 – SCAPS Financial Report

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	<b>Local Appropriations</b>	Revenue from County Appropriations
2000	Intergovernmental Revenue	
2100	Payments from other Governmental Units	
2200	Payments from Public Charter Schools	
3142	<b>State Funds</b>	Includes payment received for Supervisor's Salary and Program Aid on an annual basis from state funds for School Lunch Program Aid
3999	Revenue from Other State Sources	
4800	<b>USDA Reimbursement</b>	
4810	School Lunch and Afterschool Snack Programs	Income received as USDA reimbursement
4830	School Breakfast Program	Income received from USDA
4850	Cash in Lieu of Commodities	Income received from USDA in lieu of commodity foods
4999	<b>Other Federal Revenue</b>	Income received from other federal sources
4991	<b>USDA Commodities</b>	Value of USDA commodities received during the period
	<b>Total Revenues</b>	Revenues for the reporting period are automatically totaled for you.

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen under Revenue and Expenses – EXPENSES Section

12.	1950	Refund Prior Years Expenditure	\$0.00
13.	1960	Transfer from Other Funds	\$0.00
14.	1900	Other - Local Revenue	\$0.00
15.	1610	Afterschool Snack Sales to Students	\$0.00
16.	1999	Catering	\$0.00
17.	1992	Canteen Operations	\$0.00
18.	2000	Local Appropriations	\$0.00
19.	3142	State Funds	\$0.00
20.	4800	USDA Reimbursement (SNP + ASP + FFVP)	\$0.00
21.	4999	Other Federal Revenue	\$0.00
22.	4991	USDA Commodities	\$0.00
<b>Total Revenue</b>			<b>\$0.00</b>
<b>Expenses</b>			
	Account	Description	Amount
23.	100	Salaries	\$0.00
24.	200	Employer Benefits	\$0.00
25.	300	Purchased Services	\$0.00
26.	400	Supplies	\$0.00
27.	450	Inventory Loss	\$0.00
28.	460	Purchased Food	\$0.00
29.	461	USDA Commodities	\$0.00
30.	462	Commodity Distribution Charge	\$0.00
31.	540	Equipment - Expendable	\$0.00
32.	570	Depreciation	\$0.00
33.	670	Sales Tax	\$0.00
34.	600	Other Objects	\$0.00
35.	700	Transits/Fund Modifications	\$0.00
36.	432	Indirect Cost Transfer	\$0.00
<b>Total Expenses</b>			<b>\$0.00</b>
<b>Summary</b>			
	Account	Description	Amount
37.		Fund Balance - Beginning of Year	\$0.00

## Chapter 9 – SCAPS Financial Report

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100	<b>Salaries</b>	Includes regular, temporary, and overtime salaries as defined below:
110	Regular Salaries	Full-time and part-time costs for work performed by SFA employees who are considered to be in permanent positions.
120	Temporary Salaries	Full-time and part-time costs for work performed by SFA-hired temporary or substitute employees hired in positions of either temporary or permanent nature.
130	Overtime Salaries	Money paid to SFA employees working in either permanent or temporary positions who perform work in addition to normal work periods.
<hr/>		
200	<b>Employee Benefits</b>	Fringe benefit amounts paid by the CNP fund on behalf of employee (over and above the state allocation). Includes:
210	Group Health and Life Insurance,	
220	Employee Retirement,	
230	Social Security,	
260	Unemployment Compensation Tax, and	
290	Other.	
<hr/>		
300	<b>Purchased Services</b>	Amounts paid for personal services rendered by personnel who are not on the payroll of the SFA and other specialized services which the SFA may purchase. For the CNP, this refers to services not included in the indirect cost rate and that are a direct cost to food service. Purchased services that are part of the indirect cost for the CNP must be paid from the General Fund.
315	Management Services	Amounts paid for personal services performed by persons not on the SFA payroll such as contracted food service management.
321	Public Utility Services	Expenditures for services usually provided by public utilities such as water, sewage, garbage collection. This includes those same services whether the utility company is public or private. (Costs for telephone, telegraph, and energy services are not included here.) Telephone and other communication services should be reported as 340. Communications and energy services such as natural gas, oil, and electricity costs are considered 400 Supplies.
322	Cleaning Services	Expenditures for services purchased to clean buildings (other than those provided by SFA employees).
323	Repairs and Maintenance Services	Expenditures for services not provided by school CNP personnel that are not included in the district's indirect cost rate.
324	Property Insurance	Expenditures for insurance on CNP property owned or leased by the school district.

## Chapter 9 – SCAPS Financial Report

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325	Rentals	Expenditures for leasing or renting equipment for both temporary and long-range use.
329	Other Property Services	Property services not classified in categories listed.
332	Travel	Expenditures for transportation, meals, hotel, and other expenses associated with traveling on business for the SFA. Payments for per diem in lieu of reimbursements for subsistence (room and board) are also charged here.
340	Communication	Expenditures for services provided by persons or businesses to assist in transmitting and receiving messages for information. This category includes telephone and telegraph services.
350	Advertising	Expenditures for printed announcements in professional periodicals and newspapers or announcements broadcast by radio and television networks.
360	Printing and Binding	Expenditures for printing and binding, usually according to specifications of the school district. This includes the design and printing of forms and posters as well as printing and binding of CNP publications.
400	<b>Supplies</b>	Supplies and Materials including energy costs
410		Expenditures for supplies for the CNP
445	Technology and Software Supplies	Expenditures for technology items and supplies used to support technology equipment. Included are expenditures for non-capitalized technology items, video tapes, CDs, surge protectors, printer cartridges, etc.
470	Energy	Electricity, gas, oil, and other heated fuels if direct billed to CNP and on a separate meter only.
450	<b>Inventory Loss</b>	Expenditures that are the result of a deficit or loss usually found in an audit or count of items held in a warehouse or storage area inventory. Only losses are charged to this account.
460	<b>Purchased Food</b>	Expenditures for food purchases and commodity process fees. Note that rebates for processed product are a “refund of an expenditure” and must be credited to that account.
461	<b>USDA Commodities</b>	Because of the change in USDA commodity identification and treatment as purchased food upon receipt, this item is defined as cash value of USDA Commodities received during the period. The USDA Commodity entries for revenues and expenditures are now the same since a separate value of commodity inventory used during a reporting period is no longer required nor maintained. Thus a “wash” is created to balance the ledger while still documenting all food used each period. Food used represents both purchased and commodity foods combined as one reporting item.

## Chapter 9 – SCAPS Financial Report

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462	<b>Commodity Distribution Charge</b>	Expenditures for distributor charges for handling (storage and delivery) of USDA commodities.
540	<b>Equipment-Expendable</b>	Expenditure for expendable equipment or equipment and supply items that cost less than \$5000.
570	<b>Depreciation</b>	The amount reported is the portion of the cost of a fixed asset (i.e. non-expendable equipment) which is charged as an expense during a particular period. As such, depreciation represents the reasonable allowance for the deterioration, wear and tear, and obsolescence of non-expendable equipment used in CNP operations. Non-expendable equipment is further defined as equipment exceeding \$5000 in unit cost.
<p>The initial cost and installation fee for a piece of equipment are considered when determining unit cost. Only those fixed assets exceeding the \$5000 unit cost are added to the depreciation schedule.</p> <p>In terms of food service equipment, the rate of depreciation is based on a monthly depreciation factor of .007 applied to the total cost of the piece of equipment and depreciated over the period of 12 years. The monthly depreciation value can also be calculated by dividing the equipment cost by 144 (12 years x 12 months). The 12-year depreciation schedule applies to all food service equipment with an original unit price of \$5000 or more. Automotive and computer equipment are depreciated for 6, 5, or 4-year periods dependent on the type and unit cost of equipment. The monthly depreciation rates used in the district for automotive and computer acquisitions should be applied. In most cases, computer and related technology equipment unit costs are below \$5000 and will be treated as expendable equipment for reporting purposes and not depreciated.</p>		
670	<b>Sales Tax</b>	Expenditures for sales tax on adult sales paid to the S.C. Department of Revenue.
600	<b>Other Objects</b>	Amounts paid for goods and services not included in the above expenditure classifications.
640	Dues and fees	Expenditures or assessments for membership in professional or other organizations or associations.
690	Other	Amounts paid for all other expenses that are not listed.
700	<b>Transits/Fund Modifications</b>	Object category is used to show transactions where money has been transferred from one fund to another or for transmitting flow-through funds.
710	Fund Modifications	Represents transactions conveying money from one fund to another. Normally, this takes the form of payments from the General Fund to some other fund.

## Chapter 9 – SCAPS Financial Report

720      Transits                      This category represents transactions that are transit or flow-through in nature. Object is used in conjunction with payments to the South Carolina Department of Education or other governmental units.

**Indirect Cost Transfer**

432      Indirect costs actually transferred from the CNP fund to the General Fund during the reporting period. The actual amount cannot exceed the District Indirect Cost that has been calculated and automatically entered as the final item under the Summary tab screen in SCAPS.

**Total Expenses**

SCAPS will automatically total all reported items on Expenses Tab.

### SCAPS Screen under Revenue and Expenses – SUMMARY Section

<b>Total Expenses</b>		<b>\$0.00</b>
<b>Summary</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
37.	Fund Balance - Beginning of Year	\$0.00
	Revenue	\$0.00
	Fund Balance - Prior to Expenses	\$0.00
	Expenses	\$0.00
	<b>Fund Balance - End of Year</b>	<b>\$0.00</b>
<b>Non-Expendable Equipment</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
38.	Expenditure for Non-Expendable Equipment	\$0.00
<b>Indirect Costs</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
	Indirect Cost Rate	12.9000
	Allowable Indirect Costs	\$0.00
	Actual Indirect Costs	\$0.00
39.	State Costs	\$0.00
<b>Operating Balance</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
40.	Cash Balance - End of Year	\$0.00
<b>Purchased Food</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
	Food Inventory - Beginning of Year	\$0.00
41.	Food Purchased During Year	0.00
42.	Food Inventory - End of Year	0.00
	Cost of Purchased Food Used During the Year	\$0.00
<b>Purchased Supplies</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
	Supply Inventory - Beginning of Year	\$0.00
43.	Supplies Purchased During Year	0.00
44.	Supply Inventory - End of Year	0.00

## Chapter 9 – SCAPS Financial Report

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<b>Fund Balance BOY</b> (Beginning of Year)	This is the fund balance brought forward from the preceding year. The fund balance at the beginning of the school year (July 1) should be the audited fund balance as of June 30 <sup>th</sup> . Audit adjustments must be made on the June claim each year for the appropriate rollover of the fund balance from one school year to the next.
<b>Revenue</b>	Revenues received for the current reporting period as recorded directly from the General Ledger.
<b>Fund Balance-Prior to Expenses</b>	Beginning of Year Fund Balance <b>plus</b> Revenue
<b>Expenses</b>	(-) minus Total expenses for the reporting period (=) equals
<b>Fund Balance EOY</b> (End of Year)	This ending fund balance will be rolled over automatically as the BOY Fund Balance for the next reporting period.
<b>Expenditure for Non-Expendable Equipment</b>	Expenditures for non-expendable equipment and for installation and sales tax that are part of the acquisition cost. Non-expendable equipment is that costing more than \$5000 and having a useful life of more than one year.  Vehicles (with the exception of passenger vehicles) that will be used in the operation of the CNP are considered accountable equipment for purposes of depreciation and are expensed as depreciated.  All equipment expenditures included here are considered accountable and must be added to the depreciation schedule as fixed assets.
550	
<b>SFA Indirect Cost Rate</b>	Entered at SCDE each school year - Reflects the SFA's assigned indirect cost rate for the CNP. Indirect cost was designed to pay costs to an SFA that cannot be identified as a direct cost to a specific program and thus, are considered shared costs, i.e. utilities, payroll, accounting, computer services, repair and maintenance, etc. These costs are normally incurred and paid by the General Fund for all district operations and programs. The indirect cost rate for the CNP was established to allow SFAs to recover a portion of these operational costs that could be attributable to the CNP.  Costs not included in the indirect costs rate would be direct costs that are allowable and identified specific to the CNP. Certain prorated direct expenditures are also not included in the indirect rate. Any prorated expense charged to the CNP fund must be fully documented and defensible in terms of reason and equity.

## Chapter 9 – SCAPS Financial Report

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### District Indirect Cost

The value of indirect costs transferred from the CNP fund to the SFA is determined by the annual assigned indirect cost rate for the CNP. As indicated under the SFA Indirect Cost Rate explanation, the indirect cost rate for the CNP represents shared costs for overhead operations such as maintenance, electricity, computer services, etc. that cannot be specifically identified to the CNP. Costs included in the rate may not be directly expensed to the CNP.

To determine the actual indirect costs that may be transferred, the following calculation is made automatically by SCAPS and entered here. The assigned indirect cost rate for the CNP is multiplied times the sum of salary expenses **plus** employee benefits (shortfall only after the state allocation has been exhausted) **plus** purchased services **plus** other objects. The maximum amount that can be received will be indicated in the SCAPS Revenue and Expenses screen each reporting period under the “Indirect Costs” section with the indirect cost rate. The actual transfer amount reported if entered as an “expense” item will be compared to the SCDE-computed maximum to ensure that indirect costs are not inappropriately assessed if transferred from the CNP fund on a monthly basis.

---

### State Cost

As reported in this item, state costs are the employer contributions for Health Insurance, Dental Insurance, State Retirement, and Social Security (FICA) paid for CNP personnel **from the state allocation for fringe benefits** provided to school districts. Rates for determining these amounts are subject to change and notices of such changes are sent to the districts as they occur. When the state allocation is exhausted, the CNP Fund can be used to pay a proportionate part of the fringe benefit.

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen under Revenue and Expenses – OPERATING BALANCE Section

Total Expenses		\$0.00
<b>Summary</b>		
Account	Description	Amount
37.	Fund Balance - Beginning of Year	\$0.00
	Revenue	\$0.00
	Fund Balance - Prior to Expenses	\$0.00
	Expenses	\$0.00
	<b>Fund Balance - End of Year</b>	<b>\$0.00</b>
<b>Non-Expendable Equipment</b>		
Account	Description	Amount
38.	Expenditure for Non-Expendable Equipment	\$0.00
<b>Indirect Costs</b>		
Account	Description	Amount
	Indirect Cost Rate	12.9000
	Allowable Indirect Costs	\$0.00
	Actual Indirect Costs	\$0.00
39.	State Costs	\$0.00
<b>Operating Balance</b>		
Account	Description	Amount
40.	Cash Balance - End of Year	\$0.00
<b>Purchased Food</b>		
Account	Description	Amount
	Food Inventory - Beginning of Year	\$0.00
41.	Food Purchased During Year	0.00
42.	Food Inventory - End of Year	0.00
	Cost of Purchased Food Used During the Year	\$0.00
<b>Purchased Supplies</b>		
Account	Description	Amount
	Supply Inventory - Beginning of Year	\$0.00
43.	Supplies Purchased During Year	0.00
44.	Supply Inventory - End of Year	0.00

---

**Cash Balance End of Year (End of Year)**      This includes cash on hand, in the checking account, savings account, and investments, etc.

---

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen under Revenue and Expenses – PURCHASED FOOD AND PURCHASED SUPPLIES Section

39.	State Costs	\$0.00
<b>Operating Balance</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
40.	Cash Balance - End of Year	\$0.00
<b>Purchased Food</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
	Food Inventory - Beginning of Year	\$0.00
41.	Food Purchased During Year	0.00
42.	Food Inventory - End of Year	0.00
	Cost of Purchased Food Used During the Year	\$0.00
<b>Purchased Supplies</b>		
<b>Account</b>	<b>Description</b>	<b>Amount</b>
	Supply Inventory - Beginning of Year	\$0.00
43.	Supplies Purchased During Year	0.00
44.	Supply Inventory - End of Year	0.00
	Cost of Purchased Supplies During the Year	\$0.00
<b>Breakfast Program</b>		
<b>Description</b>	<b>Quantity</b>	
45.	Number of Universal Breakfast Programs	0
46.	Number of Breakfast in the Classroom Programs	0
<b>SFA Comments</b>		
47.	Comments:	
<b>Sponsor Certification</b>		
48.	<input type="checkbox"/> I certify that this report is complete and correct according to the record of this office, and that to the best of my knowledge, this administrative unit has complied with all federal and state requirements.	
	Authorized Signature:	Date:
	<input type="text"/>	<input type="text"/> (mm/dd/yyyy)
<b>Internal Use Only</b>		

Food Inventory –  
Beginning of Year

**Cost of Purchased Food Used**

Includes value of all food (purchased and USDA commodities) used during the reporting period. Value of inventory at the beginning of Year (BOY) plus value of food received during the year or reporting period is compared to the end of year (EOY) inventory of food.

**Cost of Purchased Supplies Used**

The same comparison is made for supplies based on beginning and end of month inventories and value of supplies purchased and received during the reporting period.

**EOY Inventory**

Enter value of inventory at the end of year (EOY).

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen under Revenue and Expenses – BREAKFAST PROGRAM Section

39.	State Costs	\$0.00
<b>Operating Balance</b>		
<b>Account Description Amount</b>		
40.	Cash Balance - End of Year	\$0.00
<b>Purchased Food</b>		
<b>Account Description Amount</b>		
	Food Inventory - Beginning of Year	\$0.00
41.	Food Purchased During Year	0.00
42.	Food Inventory - End of Year	0.00
	Cost of Purchased Food Used During the Year	\$0.00
<b>Purchased Supplies</b>		
<b>Account Description Amount</b>		
	Supply Inventory - Beginning of Year	\$0.00
43.	Supplies Purchased During Year	0.00
44.	Supply Inventory - End of Year	0.00
	Cost of Purchased Supplies During the Year	\$0.00
<b>Breakfast Program</b>		
<b>Description</b>		<b>Quantity</b>
45.	Number of Universal Breakfast Programs	0
46.	Number of Breakfast in the Classroom Programs	0
<b>SFA Comments</b>		
47.	Comments: <div style="border: 1px solid gray; height: 30px; width: 100%;"></div>	
<b>Sponsor Certification</b>		
48.	<input type="checkbox"/> I certify that this report is complete and correct according to the record of this office, and that to the best of my knowledge, this administrative unit has complied with all federal and state requirements.	
	Authorized Signature:	Date:
	<input style="width: 150px;" type="text"/>	<input style="width: 50px;" type="text"/> (mm/dd/yyyy)
<b>Internal Use Only</b>		

**Number of Universal Breakfast Programs** This figure represents the total number of Universal Breakfast Programs operating in the SFA.

**Number of Breakfast in the Classroom Programs** This figure represents the total number of Breakfast in the Classroom Programs operating in the SFA.

## Chapter 9 – SCAPS Financial Report

### SCAPS Screen Three Months Operating Balance Plan Procedures

Click onto “Financial Report”

**School Nutrition Programs** South Carolina

Applications | Claims | Compliance | Reports | Security | Search | Year | Help | Log Out

Applications > School Year: 2013 - 2014

Item	Description
SFA Manager	SNP SFA's Profile, Site and Hold Information
Application Packet	Applications Forms (SFA and Site)
Verification Report	Mandatory Annual Verification Report
Verification Summary	Mandatory Annual Verification Report Summary
Food Safety Inspections	Number of Food Safety Inspections by Site
Food Safety Inspections Summary	Number of Food Safety Inspections by Site Summary
Annual Audits	Annual Audits
Annual Audit Status Summary	Annual Audit Status Summary
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview
FFVP Grant Allocations	Fresh Fruit and Vegetable Program Grant Allocations
FFVP Invitations and Approvals	Fresh Fruit and Vegetable Program Invitations and Approvals
Financial Report	School Food Annual Revenues and Expenditures Report
Financial Report Summary	School Food Annual Revenues and Expenditures Report Summary
Site Enrollment	Site Enrollment and Eligibility
Direct Certification	Direct Certification List and Individual Student Lookup
Download Forms	Forms Available for Downloading

Click on Summary for fiscal year completed

**School Nutrition Programs** South Carolina

Applications | Claims | Compliance | Reports | Security | Search | Year | Help | Log Out

Applications > Financial Report Year List > School Year: 2013 - 2014

**School Food Service Financial Report**

Action	School Year	Form Type	Available Dates	Received Date	Status
Add	2013 - 2014	Annual	06/01/2014 - 12/31/2014		
Add	2012 - 2013	Annual	07/01/2013 - 12/31/2013		
View   Modify   Admin   Summary	2011 - 2012	Annual	07/01/2012 - 12/31/2013		Approved
View   Admin   Summary	2010 - 2011	Annual	07/01/2011 - 12/31/2011		Approved

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## Chapter 9 – SCAPS Financial Report

If an amount is shown under the “Excess Cash Resource,” the SFA is required to complete the “Plan for Reducing Excessive Operating Balance” form and submit it the SA.

SCAPS automatically calculates the Three Months Operating Balance by using the following formula.

“Total Expenditures divided by ten (10) and multiplied by three (3)”

**School Nutrition Programs** South Carolina

Applications | Claims | Compliance | Reports | Security | Search | Year | Help | Log Out

Applications > Financial Report Year List > Recap >

**SFS-FC-1A Enter  
2011 - 2012  
Annual**

<b>Net Cash Summary</b>		
<b>Net Cash Resource</b>	<b>3 Month's Operating Cost</b>	<b>Excess Cash Resource</b>
\$1,046,276.19	\$479,900.70	\$566,375.49

Please submit a "Plan for Reducing Excessive Operating Balance" form to reduce the excess funds within the next 30 days. Some acceptable uses of these funds include, but are not limited to: improving food quality and food service operations, value of repairs to existing equipment, or purchasing food service equipment. The "Plan for Reducing Excessive Operating Balance" should be in sufficient detail to enable the State Agency to determine:

- the type, quantity, and unit cost of food service equipment to be purchased
- the value of repairs to existing equipment
- salary and benefit cost for new food service workers
- cost of higher food quality products

The "Plan for Reducing Excessive Operating Balance" form can be found in the Download Forms section of SCAPS. Please remit your completed plan to the following address:

South Carolina Department of Education  
Office of Health and Nutrition  
7th Floor Rutledge Office Building  
1429 Senate Street  
Columbia, South Carolina 29201

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## Chapter 9 – SCAPS Financial Report

If the SFA is required to complete a “Plan for Reducing Excessive Operating Balance” form, click on “Download Forms”

Item	Description
SFA Manager	SNP SFA's Profile, Site and Hold Information
Application Packet	Applications Forms (SFA and Site)
Verification Report	Mandatory Annual Verification Report
Verification Summary	Mandatory Annual Verification Report Summary
Food Safety Inspections	Number of Food Safety Inspections by Site
Food Safety Inspections Summary	Number of Food Safety Inspections by Site Summary
Annual Audits	Annual Audits
Annual Audit Status Summary	Annual Audit Status Summary
FFVP Grant Overview	Fresh Fruit and Vegetable Program Grant Information by Site Overview
FFVP Grant Allocations	Fresh Fruit and Vegetable Program Grant Allocations
FFVP Invitations and Approvals	Fresh Fruit and Vegetable Program Invitations and Approvals
<a href="#">Financial Report</a>	School Food Annual Revenues and Expenditures Report
Financial Report Summary	School Food Annual Revenues and Expenditures Report Summary
Site Enrollment	Site Enrollment and Eligibility
Direct Certification	Direct Certification List and Individual Student Lookup
Download Forms	Forms Available for Downloading

Select “Plan for Reducing Excessive Operating Balance” form, complete the top section and mail the completed form to the South Carolina Department of Education, Office of Nutrition Programs at 1429 Senate Street, Rutledge Office Building Room 700 Columbia, SC 29201. Depending on the complexity of the plan, the SFA has a maximum of one year to complete the plan unless prior approval is received by the SA.

## Chapter 9 – SCAPS Financial Report

Plan for Reducing Excessive Operating Balance	
<b>Instructions:</b> When food service funds exceed three months' operating expenditures, complete this form to explain how the excess balance will be spent in order to maintain the Program's non-profit status. Submit the completed form to the South Carolina Department of Education (SCDE), Office of Nutrition Programs, 1419 Senate Street, Rutledge Office Building Room 700, Columbia, SC 29201.	
Date: _____	
School Food Authority (SFA): _____	
SFA Address: _____	
City: _____ State: _____ Zip Code: _____	
Telephone #: _____ Fax #: _____	
Contact Person's Name: _____ Title: _____	
(1) Cash Balance End of Year (5A SLP-4) \$ _____	
(2) Total Yearly Expenditure divided by 10 times 3) = \$ _____	
(3) Amount of funds to be reduced (#1 minus #2) = \$ _____	
Briefly Outline Plan: (Please complete page two or attach Plan)	
The above named SFA herein submits the following plan to reduce the excessive operating food service balance. This plan will be completed by _____, 20____.	
Printed Name of SFA Authorized Representative: _____	
Signature of SFA Authorized Representative: _____	
<b>FOR USE BY SCDE ONLY:</b>	
Approved _____ Denied (Justification): _____	
Name & Title of SCDE Official	Signature and Date of SCDE Official
_____	_____
<b>On-Site Review and Verification of Completed Plan:</b>	
Signature of Education Associate	Date
_____	_____
<b>Final Approval of Completed Plan:</b>	
Director, Office of Nutrition Programs	Date
_____	_____
Last Updated: October 10, 2013	

**Briefly Explain Plan for Reducing Excessive Operating Balance:**

### Important Point!

To monitor food and labor costs by program for all schools or sites, it is critical that financial information be maintained by the SFA. The exact format for obtaining costs is not prescribed. However, administration must set standards for meal costs for labor and food and monitor such standards in order to fully manage the meal programs. A system for making cost comparisons and adjustments as needed is also critical to a well-managed CNP.

As part of the reporting and monitoring process, the Revenue and Expenses component of SCAPS is designed to capture critical information needed for financial oversight and management of the program. This information should be completed on a timely basis and, for school districts, must reflect General Ledger entries. For Residential Child Care Institutions and Private/Parochial Schools, entries must support the use of federal reimbursement funds received.

**South Carolina**  
**School Food Service Program Reference Manual**  
**Contributors: Gregg Ferguson, SNS and Janice Oates, RD, SNS**  
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# Chapter 10 – Determining Eligibility

## Concerns About “Over-Certification”

The U.S. Department of Agriculture (USDA) data indicates that a significant and increasing number of ineligible children are being certified for free and reduced-price school meals. When ineligible children receive free and reduced-price benefits, federal reimbursement is misdirected, as are significant amounts of state, federal, and in some cases, local education funds. Furthermore, questions about the integrity of the eligibility determination and verification process undermine public confidence in a program that has long enjoyed the support of the American people and the U.S. Congress. School Food Authorities (SFAs) should make every reasonable effort to ensure that applications are completed correctly and benefits are provided only to eligible households.

## Eligibility Guidance Resources

It is important that all individuals involved in the benefit determination process are knowledgeable and up to date on the requirements. USDA's *Eligibility Manual for Schools Meals* provides comprehensive information about determining and verifying eligibility for Child Nutrition Program (CNP) benefits. Note that USDA has published multiple copies of this manual. Because of changes in the law resulting from the Reauthorization of the CNP in June 2004, some of the information in older versions is now outdated. The most current version was published in August 2013 and is available from [www.fns.usda.gov/CND/Guidance/EliMan\\_highlighted.pdf](http://www.fns.usda.gov/CND/Guidance/EliMan_highlighted.pdf).

## Overview of Methods for Determining Eligibility

There are two ways in which a student may be eligible for free or reduced-price meals.

1. “Income eligible” students are those who are eligible for free or reduced-price meals based on their household size and income level. The guidelines, which are based on the current poverty level, are set annually by the Secretary of Agriculture and can be found in the SFA's Policy Agreement. (See Chapter 3 – Policy Agreement in this *Program Reference Manual* for additional information.)
2. “Categorically eligible” students are those who are automatically eligible for free meals because they are:
  - a. A member of a household that receives benefits from the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF) program;
  - b. Enrolled in a Head Start or Even Start program;
  - c. Classified as “homeless” by the school district’s homeless liaison or by the director of a homeless shelter;
  - d. A runaway child who is receiving assistance from a program under the Runaway and Homeless Youth Act and is identified by the local educational liaison; or
  - e. A migrant child as determined by the state or local Migrant Education Program (MEP) coordinator.

Students who are categorically eligible may be directly certified or may notify the SFA of their categorical eligibility at any time. Direct certification is the process by which students are automatically approved for free CNP benefits based on information provided by the appropriate state or local agency or other recognized authority. See Chapter 10 – Direct Certification in this *Program Reference Manual* for additional information on direct certification procedures and requirements.

## Required Forms for Determining Eligibility

Federal regulations require that SFAs have an approved application or direct certification documentation on file for each student served a meal meeting program requirements that is claimed for federal reimbursement at the free or reduced-price rate. Under certain circumstances Head Start, Even Start and homeless students may be documented from a pre-approved list, similar to direct certification.

The forms listed below are part of the South Carolina Department of Education's (SCDE's) Policy Agreement packet. SCDE prefers that SFAs use these forms exactly as they are provided. If the SFA chooses to modify the format or content of any of the following forms, SCDE must annually pre-approve the revised version before it is distributed. Refer to South Carolina Automated Payment System (SCAPS) for the required forms.

**Parent/Guardian Letter (Appendix B)** Refer to South Carolina Automated Payment System (SCAPS) for the required form. This letter, or a similar approved version, is completed by filling in the school district name, meal prices and contact information. It must be distributed to **all** households of enrolled students.

**Free and Reduced-Price School Meals Application (Lunch Application)** This application form **must** be distributed to all households along with the above "Parent/ Guardian Letter" (See Chapter 3 – Policy Agreement).

**Notification Letter (Letter to Household about Approval or Denial of Benefits) Appendix D)** All households that complete an application must be notified of their eligibility determination. Households that are approved for benefits may be notified verbally or in writing. All students denied benefits must be notified in writing. For students denied eligibility, a copy of the completed letter (provided in Chapter 3 – Policy Agreement and SCAPS) should be attached to each application and filed.

## Foreign Language Translations

SFAs must send the appropriate non-English language application and letter to households if a significant number of enrolled children come from households belonging to the same foreign language group and have limited English communication skills. If the number of non-English language households is not significant, the SFA need not provide foreign language translations. However, SFAs are encouraged to provide assistance in filling out applications through the use of translators. The FNS web site at (<http://www.fns.usda.gov/cnd/Application/familyfriendlyapps.html>) has the prototype application and materials translated in a number of languages.

## Duration of Eligibility

A child's eligibility is in effect from the date of eligibility for the current school year, up to 30 operating days in the subsequent school year. However, this does not apply when the initial eligibility determination was incorrect or when verification of household eligibility, including verification for cause, does not support the level of benefits for which the household was approved. In those instances, officials must make appropriate changes in eligibility.

### PROHIBITION ON THE USE OF TEMPORARY APPROVAL

Temporary approval of an application is no longer permitted because of the year long duration of eligibility provision. If LEAs/schools are concerned with the authenticity of the information provided on an application, they may, on a case by case basis, verify the application for cause.

### Benefits Prior to Processing Applications

SFAs may use eligibility from the prior year to establish student eligibility for up to the first 30 operating days of the current school year (beginning with the first day of school) or until a new application is approved/denied, whichever comes first.

This regulation **does** apply to the following:

- Children from households with approved applications on file from the previous year;
- New children in the SFA from households that were approved for benefits the previous year based either on income or categorical eligibility (Note: USDA revised the policy on siblings from categorically eligible households in August 2012). The children must be listed on the previous year's application; and
- Previously approved students who transfer from one school to another under the jurisdiction of the same SFA.

This regulation does **not** apply to students who transfer from one SFA to another.

The number of approved eligible students that are carried over to the current school year must be adjusted for students who graduated or withdrew from the SFA. After the 30 operating days, students without new applications must have their benefits terminated.

Once a current application is received and approved or denied, a child's eligibility status is effective immediately. If the benefit level is reduced or denied based on the new application, the SFA is not required to give the 10-day adverse action notice (because it is not considered a "change" in benefit level).

#### When to Change Benefit Level

- |     |  |
|-----|--|
| Q-1 | <i>A household completed a new application 15 days after the beginning of the school year. May I continue to provide meals based on last year's eligibility for 30 calendar days even though an application for the current school year indicates a change in the benefit level?</i> |
| A   | No. Changes in eligibility status that result from a new application are effective immediately.  |

### Benefits Prior to Approval

- Q-2 *If a student has charged meals prior to an application being approved, may those meals be claimed at the benefit level established by the new application?*
- A No. Eligibility status is not retroactive. Meals can only be claimed from the date of approval forward.

## Distribution of Applications

The Parent/Guardian Letter (See [Chapter 3 – Policy Agreement](#), Appendix B) or a similar, approved version, and the Free and Reduced-Price School Meals Application (see [Chapter 3 – Policy Agreement](#)) must be provided to parents and guardians of all enrolled students. This ensures that no child is inadvertently excluded from participation in the CNP.

### When to Distribute Applications

Letters and applications should be sent to households as early as possible in the school year to allow for the return and review of applications. However, the letter may not be sent earlier than four calendar weeks prior to when students start school and SFAs may not begin accepting and processing applications prior to July 1.

### How to Distribute Applications

If the letter and application are distributed through the mail, in individualized student packets or by other methods that would prevent the overt identification of directly certified students, then the parents or guardians of those students may be excluded from the distribution of these materials. Under this option, households will receive either a letter to parents with an application form or a letter notifying them that their children are preapproved and eligible for free meal benefits.

Other acceptable methods for distributing letters and applications include giving each student a copy to take home and including a copy in each student's enrollment packet.

It is **not** acceptable to:

- Have applications available on a table, within sight of other people, for a parent/guardian or child to pick up;
- Ask a parent/guardian, within hearing distance of other people, if he/she would like an application;
- Only make applications available to parents/guardians who request one;
- Provide application forms only to those who received program benefits during the prior school year;
- Require parents/guardians to go to a particular place to apply for meal benefits;
- Require a parent/guardian to request an application.

### Providing Assistance with Applications

- Q-3 *We open our office prior to the beginning of the school year and offer parents and guardians an opportunity to apply for meal benefits and, if needed, receive help in filling out the application. Is this acceptable?*
- A Yes, as long as (1) the parents/guardians are not required to come to the office to apply for meal benefits, (2) a system is in place for reviewing any additional application submitted by the households to ensure that the information is the same as that indicated on the original application and (3) a system is in place for eliminating duplicate applications from the file.

### Distributing Applications Early

- Q-4 *May applications be provided at the end of the school year for parents to return at the beginning of the next school year?*
- A No, because the application is to be based on the household's eligibility at the beginning of the new school year. Therefore, households must be provided with the eligibility criteria near the beginning of the school year and not before July 1.

### Preprinted Applications

- Q-5 *In a computerized operation, may a preprinted copy of last year's application be given to the household so that they can easily update the application? What items may be preprinted?*
- A It is the household's responsibility to complete the application. A school may send households an application with the child's name, the name of the household, and the household's address preprinted. No other information may be preprinted.

## Reviewing Official's Responsibilities

Each SFA is required to designate a reviewing official in their Policy Agreement (See [Chapter 3 – Policy Agreement](#)). The reviewing official(s) must review each application for free and reduced-price school meals submitted to ensure that it is complete. If it is complete, the reviewing official approves or denies it based on the reported information. Any questionable or inconsistent information on the application must be clarified before the application is processed. The reviewing official then records the date of the approval or, if applicable, the date and reason for the denial and notifies the household of approval or denial.

Applications should be processed in a timely manner. An eligibility determination should be made as quickly as possible, but always within ten working days of receipt of the application. Priority should be given to applications for students who do not already have one on file (for example, students who have transferred from other SFAs, siblings of categorically eligible students and students without a sibling in the SFA.) Recommend that SFAs date and/or stamp application once received by household(s).

Once an application has been received, it becomes the official record. SFAs should keep the information on the application up to date. Documentation of contacts with the household and of all information received should be recorded directly on the application or attached to it.

### **Approval of Applications by a Food Service Management Company**

Q-6 *May the approval of the Free and Reduced-Price School Meals Family Applications be delegated to a food service management company along with other management responsibilities?*

A No. The determination of eligibility for free and reduced-price meals is a SFA responsibility and cannot be assigned to a food service management company. School officials are directly responsible for determining eligibility and maintaining confidentiality of the information on the application. Refer to Chapter 15 – Food Service Management Companies in this *Program Reference Manual* for additional information.

### **Checklist for Reviewing Official**

The following information must be provided by the household before an eligibility determination can be made:

#### Income Eligible:

- Names of all household members;
- Last four digits of social security number of the adult household member who signs the application or an indication that he/she does not have one;
- The amount of current income received in the prior month by each household member; identified by source, such as wages, welfare, alimony, etc.;
- Signature of an adult household member.

#### SNAP/TANF Households:

- Name of child;
- Current SNAP/TANF case number (generally, this number will never exceed eight digits versus a 16 digit EBT card number);
- Signature of an adult household member.

#### Head Start and Even Start Students:

- An approved Head Start or Even Start application for the child's family;
- A Agreement of enrollment in Head Start or Even Start;
- A list of children participating in Head Start or Even Start.

## Eligibility Based on Household Size & Income

Households applying for free or reduced-price meals based on their household size and income must provide the following information on the application:

- Name(s) of student(s);
- Names of all household members;
- The last four digits of the Social Security number of the adult household member who signs the application or an indication that the adult household member does not have a Social Security number;
- The amount of income received by each household member in the prior month identified by the individual who receives it, and the source of income (for example, wages, welfare, alimony, last four digits of social security, etc.)
- Signature of an adult household member.

### Applications with Missing Information

The reviewing official must not delay approval of an application if the household fails to provide any **non-required** information. For example, households are not required to complete the racial/ethnic identity question. However, if the household does not complete this section, a school official must complete it, unless the racial/ethnic identity data is available by other means within the SFA's records.

Every reasonable effort should be made to obtain required missing information prior to denying the application. If an application is incomplete, it may be returned to the household or the household may be contacted either by phone or in writing to obtain the information. Document the details of the contact, enter the information received on the application, initial and date the entry. SFAs should never cover any information provided by the household on the application with correction fluid.

If any information provided on the application is discovered to be incorrect (through contact with the household), the SFA should:

1. Cross out the original information with one line in red ink.
2. Correct the information as provided by the household.
3. Document the source of the correct information.
4. Initial and date the changes.

If the application is missing the signature of an adult household member, the application must be returned to the household. The household member's signature certifies that the information on the application is true and correct.

## Complete Applications

Q-7 *Does the racial/ethnic identity question have to be completed by the household?*

A No. However, regulations implementing the Civil Rights Act of 1964 require recipient agencies to have available for review racial/ethnic data showing the extent to which minorities apply for and are beneficiaries of federally-assisted programs. If the households do not complete the racial/ethnic data question, a school official should complete it.



Q-8 *Does an emancipated child sign his/her own application? Is a Social Security number required?*

A An emancipated child who lives alone as a household of one, or as a member of a household with no adult household members, must sign his or her own application. No Social Security number is required since the emancipated child is not an adult.

## Determining Household Income

A household that is not categorically eligible to receive free CNP benefits must provide household size and income information on the Free and Reduced-Price School Meals Application (see [Chapter 3 – Policy Agreement](#), Appendix B) when applying for benefits.

### Reportable Income

Households must report any money received on a recurring basis including gross earned income. Gross income is the amount earned **before** deductions for income taxes, employee's social security taxes, insurance premiums, etc. Total gross income must be considered regardless of amounts that are garnished or used to pay creditors. The amount reported should be the amount received during the most recent month before applying. Income to be reported includes:

- Payment for services, wages, salary, tips, commissions or fees, including overtime earnings;
- Earnings of a student for full-time or regular part-time work;
- Social Security benefits;
- Supplemental Security Income (SSI);
- Public assistance/welfare payments (TANF, etc. but not SNAP);
- Alimony or child support payments;
- Unemployment compensation;
- Government civilian employee or military retirement or pension;
- Veteran's payments;
- Private pension, annuities, or retirement income;
- Regular contributions from persons not living in the household;
- Strike benefits;
- Workers' compensation or disability benefits;
- Net income for self-employed farmers and business persons, net rental income, and royalties;
- Dividends or interest on savings or bonds;

- Income from estates or trusts;
- Other cash income including cash amounts received or withdrawn from investments, trust accounts, and other resources that would be available to pay the price of a child's meal;
- Military benefits received in cash, such as housing allowances for military households living off-base and food allowances. See page 10-12 for more information.

### Rental Income

Q-9 *If one household owns a housing unit and rents living space to another household, does the household receiving the rental fees have to report this amount as income?*

A Yes. Income includes money derived from rent of room(s), apartment(s), etc. If a household receives rental income from another household, it must be included as income. The treatment of rental income would be similar to the treatment of self-employment income.

### Income Excluded

Income **not** to be counted or reported in the determination of a household's eligibility for free or reduced-price meals includes:

- Any cash income or value of benefits a household receives from any federal program that excludes such income by legislative prohibition, such as the value of food assistance provided under SNAP. For a complete listing of federal programs exempt from reporting the value of benefits as income refer to USDA's *Eligibility Guidance for School Meals Manual*;
- Student financial assistance provided for the costs of attendance at an educational institution, such as grants and scholarships, awarded to meet educational expenses and not available to pay for meals;
- Loans, such as bank loans, since these funds are only temporarily available and must be repaid;
- The value of in-kind compensation, such as military on-base housing or any other non-cash benefit;
- Occasional earnings received on an irregular basis, not recurring, such as payment for occasional babysitting or mowing lawns;
- Lump sum payments or large cash settlements (such as an insurance payment for fire damage to a house) **unless** the household makes regular withdrawals from that lump sum and uses the money for living expenses.

### Rent Paid by Two Separate Households

Q-10 *If two separate households rent living space (e.g. an apartment or house), and one household gives its portion of the rent to the other household which, in turn, transmits the full rent to the landlord, does the rental income given to the transmitting household count as rental income?*

A No. The transmitting household has not received income; rather it is performing a simple financial transaction that does not provide it with additional income.

## Military Benefits

An in-kind benefit is excluded, such as non-privatized on-base housing, where no cash is provided to the household. Other sources of excluded income related to the military:

Family Subsistence Supplemental Allowance (FSSA) - By law, the FSSA is not counted as income in determining eligibility for free and reduced price meals;

Privatized housing allowances received under the Military Housing Privatization Initiative are not counted as income. Under this privatization initiative, a housing allowance appears on the leave and earnings Agreement of service members living in privatized housing. The exclusion only applies to service members living in housing covered under the Military Housing Privatization Initiative. Housing allowances for households living off-base in the general commercial/private real estate market are counted as income. Additional information about DOD's Military Housing Privatization Initiative, including a list of affected installations, may be found at <http://www.acq.osd.mil/housing>;

Combat Pay is excluded if it is:

- Received in addition to the service member's basic pay;
- Received as a result of the service member's deployment to or service in an area that has been designated as a combat zone; and
- Not received by the service member prior to his/her deployment to or service in the designated combat zone.

Combat pay as described is extended to Deployment Extension Incentive Pay (DEIP). DEIP is given to active-duty service members who agree to extend their military service by completing deployment with their units without re-enlisting.

- This exemption applies only until the service members return to their home station. DEIP payments provided to service members that are not considered deployed are not exempt.

### Military Housing

Q-11 *1. Why is the housing allowance provided to service personnel counted as income when the value of provided housing is not?*

A

Income is defined as all cash received on a recurring basis. In-kind benefits, by definition, are not cash payments, and, therefore, are not considered as income for the purpose of determining free and reduced price eligibility. School officials are not in a position to determine the value of in-kind benefits, such as housing for clergy, cars for salespersons, employee medical or dental benefits, etc. The income exclusion for in-kind benefits is uniform throughout the school meal programs. To treat in-kind benefits provided to military households differently from in-kind benefits provided to the general population would create an inequity. The fact that the value of military on base housing is more readily identifiable than other sources of in-kind benefits would not lessen the inequity.

### **Possible Problems**

If the income reported seems inappropriate for the pay frequency specified, contact the household to clarify how often the income is received.

If the household reports an hourly wage but does not report the number of hours worked, before calculating household income, the SFA must contact the household to clarify how many hours are normally worked.

### **How to Compute Total Income**

It is the responsibility of the reviewing official to compute the household's current total gross income and to compare the total amount to the Household Size and Income Guidelines. (See the current year's guidelines provided in the SFA's Policy Agreement.)

1. If the income given for the adult household member(s) is provided in one common time frame and more than one source of income is provided, add the income amounts together.
2. If there are multiple income sources with more than one frequency, the LEA must annualize all income by multiplying:
  - Weekly income by 52;
  - Bi-weekly income (received every two weeks) by 26;
  - Semi-monthly income (received twice a month) by 24;
  - Monthly income by 12.
3. Compare the total income to the income eligibility guideline for the specified time frame (for example, monthly) and household size on the Household Size and Income Guidelines chart. (Use the current guidelines provided in the SFA's Policy Agreement.)

### **Seasonal Workers, Self-Employed and Farm Income**

Current income may be calculated differently for seasonal workers and self-employed persons. Seasonal workers, such as migrants, and others whose income fluctuates usually earn more money in some months than in other months. The previous month's income may not represent the household's current circumstances.

In these situations, the household may project its annual rate of income and report this amount as its current income or use the prior year's income if it provides an accurate reflection of the household's current income.

Self-employed persons are allowed to report net business income rather than gross business income. Net income for self-employment is determined by subtracting business expenses from gross receipts. Net income for a self-employed farmer is figured by subtracting the farmer's operating expenses from gross receipts. Gross receipts include the total value of goods sold or services rendered by the business/farm. Self-employed persons may use income tax records for the preceding calendar year as a base to project the current year's income, unless the current monthly income provides a more accurate measure.

Additional income received from other kinds of employment must be treated as separate and apart from the income generated from a self-owned business. For example, if the business

operated at a net loss, but the household member or another household member held additional employment for which a salary was received, the income for purposes of applying for free and reduced-price meals would be the income from the salary only. The loss from the business cannot be deducted from a positive income earned in other employment. For purposes of applying for CNP benefits, it is not possible to report a negative income from any business venture. The least income possible is zero (no income).

### Pay Stubs Provided but No Income Listed

Q-12 *A household voluntarily provided pay stubs with the application but did not write the amount of each person's income on the application. All other items were completed. According to the pay stubs, the household is eligible for benefits. What should the reviewing official do?*

A Rather than denying the application or returning the application to the household, the reviewing official may contact the household by phone or in writing to ensure that the household submitted all documentation of income. The official should document the contact, enter the information on the application and initial and date the action.

### Known Income Not Provided

Q-13 *Can the reviewing official make an eligibility determination based upon other income sources which were not declared on the application but about which the official knows?*

A No. The reviewing official must make the initial determination based upon the face value of the application. However, immediately after the application is approved, the SFA may begin the verification process on the application.

### Additional Income Suspected

Q-14 *What if the reviewing official suspects that there are other sources of income?*

A Any application that contains questionable information **must** be verified as soon as possible. See Chapter 11 – Verification of Eligibility in this *Program Reference Manual* for additional information and instructions.

### Determining Household Size

School officials must often use their discretion in making household size determinations. However, household composition, for the purpose of making an eligibility determination for free and reduced-price benefits, is based on economic units. The definition of those and other important terms are provided below:

## Definitions

**Household** – A group of related or unrelated individuals who are not residents of an institution or boarding house but who are living as one economic unit.

**Economic Unit** – A group of related or unrelated people, who share housing and/or all significant income and expenses of its members. Generally, individuals residing in the same house are an economic unit. However, more than one economic unit may reside together in the same house. Separate economic units in the same house are characterized by prorating expenses and economic independence from one another.

**Household of One** – A one-person household. This term applies to an emancipated child living alone or as a separate economic unit.

**SNAP Household** – Any individual or group of individuals currently certified to receive benefits under the Supplemental Nutrition Assistance Program (SNAP).

**TANF Assistance Unit** – Any individual or group of individuals currently certified to receive assistance under the Temporary Assistance for Needy Families (TANF) program.

**Categorical Eligibility** – A child for whom SNAP/TANF is received is automatically eligible for free meals when the household provides a current SNAP or TANF case number on the application.

**Students Away at School** – Students who are temporarily away at school, for example students attending boarding schools or colleges, should be counted as members of the household.

**Military Families** – Military personnel on shore duty living with the household or away on Temporary Duty (TDY) are considered household members. Military personnel serving overseas or assigned to a military base and not living with the household are not considered members of the household for purposes of determining eligibility, but the money sent to the household is included as income to the household.

**Child Living with One Parent, Relatives or Friends** – In cases where no specific welfare agency or court is legally responsible for the child or where the child is living with one parent, other relatives or friends of the family, the child is considered to be a member of the household with whom he/she resides, and the size and total income of that household is used to determine the child's eligibility. Children of divorced or separated parents are generally considered part of the household that has custody.

**Joint Custody** – When joint custody has been awarded and the child physically changes residence, the child is considered part of the household where he/she resides. In these situations, if both parents apply for benefits in the same SFA for the child, and different eligibility statuses result, the greatest benefit level is used. For example, if the mother's situation results in eligibility for free meals but the father's application is denied, the child would receive free meals regardless of which parent had custody at the time.

**Adopted Child** – An adopted child for whom a household has accepted legal responsibility is considered to be a member of that household. Therefore, the household’s size and total income is considered in the eligibility determination.

### Adoption Assistance Payments

Q-15 *Are children for whom households receive adoption assistance payments under Title IV-E of the Social Security Act automatically eligible for free school meals?*

A No. Sections 673 and 674 of the Social Security Act specify that, for purposes of Titles XIX (medical assistance) and Title XX (child care), children whose parents receive adoption payments shall be deemed to be recipients of the Aid to Families with Dependent Children program (formerly AFDC, now TANF). However, the statute did not extend eligibility to the NSLP, SBP, or SMP. Additionally, there is no legislative prohibition from considering the adoption assistance payments as income. Therefore, the amount of the adoption assistance payment must be included as household income.

**Child Attending an Institution** – A child who attends but does not reside in an institution is considered a member of the household in which he/she resides.

**Homeless** – An individual who lacks a fixed, regular, and adequate nighttime residence. See section entitled, “Categorical Eligibility of Homeless and Runaway Students” for additional information.

**Emancipated Student** – A student living alone or as a separate economic unit is considered to be a household of one. In some cases, an emancipated student may be living with relatives or friends, none of whom is an adult. If the household is one economic unit, all income and household members must be included to determine eligibility. Age is not a factor in defining an emancipated student.

### Student Pays Room and Board

Q-16 *If a child lives with his/her parents and is required to pay for room and board, is the child considered a separate household?*

A Not usually. The child is considered to be a separate household only in those cases where the child is living alone or as a separate economic unit. Separate economic units are usually characterized by the prorating of most household expenses. Most students paying room and board are usually paying a token amount and are not economically independent of their parents and are therefore not considered to be emancipated.

**Boarding School Students** – A student in boarding school is considered a member of the household in which he/she normally resides; therefore, household size and total household income are considered in the eligibility determination.

**Foreign Exchange Students** – A foreign exchange student is considered a member of the household in which he/she resides. Therefore, the household size and total household income are considered in the eligibility determination.

### How to Use This Guidance

Q-17 *How much judgment or discretion may the SFA exercise in determining whether a household does or does not meet the eligibility criteria for benefits?*

A Frequently questions arise concerning what is to be included as income and what constitutes a household. Free and reduced-price guidance is intended to provide guidelines for those individuals making eligibility determinations. The guidance cannot, however, address each individual situation. Reviewing officials will occasionally have to apply the broad concepts set forth in this guidance to some individual situations. If unusual situations unlike any examples in the guidance arise, the reviewing official should contact SCDE.

## DOCUMENTING FREE MEAL ELIGIBILITY FOR FOSTER CHILDREN

The LEAs are encouraged to establish formal mechanisms with State and local foster care agencies and courts to receive information directly from these agencies to facilitate certification for free meals for foster children. LEAs and foster care agencies or courts should have a written agreement between the agency or court and the LEA setting out or confirming the manner in which LEA officials would be provided the children's status. Documentation can be submitted by an appropriate State agency or court (Direct Certification):

- Electronic/computer match directly to the LEA or other child nutrition program institution indicating the status of the child as a foster child without further application;
- LEAs can accept a State agency's or court's letter confirming the child's status as a foster child submitted by the household; or
- Foster parents may complete an application and check the appropriate box indicating the child's status as a foster child. No further documentation is required (the application is subject to verification).

### Foster Parents Apply for Benefits

Q-19a *When foster parents apply for benefits for their own children, do they include their foster children as household members? Do foster parents include the payments provided by the welfare agency for care of the foster children as income to the household?*

A No. A foster child is the legal responsibility of a welfare agency or court. Because each foster child is a household of one, foster children are not included in the foster parents' household. Payments received by the household for care of a foster child are intended to be used for the foster child and are not included as part of the foster

parents' income.

*5. Is a child considered a foster child if placed in a relative's home?*

Q-19b

A

Provided a child is placed in a relative's home by a State or court system, they are considered a foster child and eligible for free meal. Informal arrangements among relatives do not qualify a child as a foster child and thus the child is not categorically eligible for free meals.

*6. Does a foster child's categorical eligibility extend to other children in the household the same as with Assistance Programs (SNAP, TANF or FDPIR)?*

Q-19c

A

No. A foster child's eligibility status for free meals does not extend to other children in the household.

#### **Foster Parents Apply for Benefits**

*7. Is the direct certification process required for a foster child and what documentation is required to verify a child's status as a foster child?*

Q-19d

A

Direct certification is not required for foster children; however LEAs and other child nutrition institutions are strongly encouraged to establish formal mechanisms with State and local foster care agencies or the courts to receive information directly from these agencies to facilitate certification for free meals for foster children. Documentation may consist of welfare agency or court documents stating that the courts have taken legal custody of a child and s/he has been placed in the foster care system or if appropriate a list of children in foster care from the welfare or court system is sufficient.

*8. What if one of the children listed on an income application is checked as a foster child?*

Q-19e

A

Since foster children are categorically eligible for free meals, the LEA notes the foster child's free meal status and then must determine the eligibility status of other children listed on the application based on household size and income. The foster child may be included on the application (at the household's discretion) as a household member along with any personal income s/he may have.

An **Institutionalized Child** is one who is living (even temporarily) in a residential child care institution (RCCI) that the state has determined is not a boarding school.

A institutionalized child is considered a household of one. Each institutionalized child must be on a separate application that includes:

- The name of the child;
- The student's personal use income;

- The signature of an adult household member, caseworker, or official of the residential child care institution – The last four digits social security number of the adult signing the application is **not** required.

**Personal Use Income** is income received and kept by the student for his/her own personal use. It is not the income a foster family or institution receives for care of the child. Often a child's personal use income is "0." In this case, the amount to report on the application is "0." If the personal use income reported is "0" for an institutionalized or foster student, the application does **not** require temporary approval.

If the student works part-time or receives an allowance, this income must be reported. The income is converted to a monthly amount, if necessary, and then compared to the Household Size and Income Guidelines for a household of one.

If the income on the application is left blank, the application is **not** considered complete and must be denied until the foster parent or caseworker can provide the information.

### **Students Who Reside In an RCCI but Attend Public School**

Q-20 *Is an application with household size and income information required for students who reside in a Residential Child Care Institution (RCCI) and attend public school during the day?*

A Yes. The day school must have an application on file for each child for whom a free or reduced-price meal is served and claimed for reimbursement, regardless of the child's place of residence. Institutionalized children are not to be categorically certified as eligible for free or reduced-price benefits. A record of each child's income, even if "0," must be identified on the application for free and reduced-price meals.

## **Additional Guidelines for Application Approval**

### **Notification of Eligibility Determination**

All households must be notified of their eligibility status. Households approved for benefits may be notified verbally.

Households who have been denied benefits must be notified in writing. The notification must advise the household of:

- The reason for the denial of benefits;
- The right to appeal;
- Instructions on how to appeal;
- An Agreement that the household may re-apply for free or reduced-price benefits at any time during the school-year.

The Notification Letter (Letter to Household about Approval or Denial of Benefits) (Appendix D) is provided in SCAPS.

Q-21 *What if a child is eligible for free meals but the household wants to pay?*

A The SFA should respect the household's wishes and allow the child to pay either the reduced-price or full-paying amount. The application should correctly reflect that the child is eligible for free meals. However, the school should note on the application that the household has elected to pay. It is preferred to have a simple written Agreement on file from the parent/guardian.

Reimbursement for meals claimed in these circumstances should be claimed at the same rate as the amount paid by the parent (i.e. if a parent pays the "paid" student amount, the meal should be claimed as "paid.") A household reserves the right to revert back to their approved level of eligibility at any time.

### **Needy Households That Do Not Apply**

Local officials may complete an application for a student known to be eligible if the household fails to apply. This option is intended for **limited use** in individual situations and must not be used to make eligibility determinations for categories or groups of children. It should be exercised only as a last resort in certifying a child for benefits.

When exercising this option, the school official must complete an application on behalf of the student based on household size and income information provided by a collateral contact. A collateral contact is a creditable person outside of the household who is knowledgeable about the household's circumstances and can give confirmation of a household's income or SNAP/TANF status. Collateral contacts include employers, social security agencies and religious or civic organizations. The reviewing official should request a collateral contact **only** when the household has not been able to provide adequate written evidence of eligibility. **The source of the information must be noted on the application.**

Names of household members, Social Security number and signature of an adult household member are not required. The household **must** be notified that the student has been certified as eligible and is receiving free or reduced-price CNP benefits. These applications should be excluded from verification.

### **Hardship Cases**

Households that are not categorically eligible or income eligible cannot be approved for benefits. There are no provisions for making exceptions based on unusual household circumstances, such as high medical expenditures or similar hardships.

SFAs may establish a special fund to cover the costs of meals for students that cannot be approved for benefits, but who are in need. Contributions from individuals or civic organizations can be provided to cover the costs of these meals. If a SFA chooses to implement this option, it is important to remember that the confidentiality of the student must be protected at all times.

### **Citizenship**

U.S. citizenship is not a factor in the determination of eligibility. An eligibility determination is based on household size/income or the receipt of SNAP/TANF benefits for the child as reported on a completed application. The SFA must apply the same eligibility criteria for citizens and non-citizens.

### **Appeals**

A household may appeal the denial of their application or the level of benefits for which they have been approved. The hearing procedures outlined in the SFA's Policy Agreement (see Chapter 3 – Policy Agreement) must be followed.

When a household appeals the reviewing official's decision, the hearing official designated by the SFA must base the final decision on all available documentation and the income eligibility guidelines. Providing free or reduced-price benefits for households that do not meet the eligibility guidelines is **not** allowed. With limited exceptions associated with civil rights and/or due process violations committed by the SFA, the decision of the hearing official is final.

### **Alternative Schools**

Currently there are many SFAs participating in some type of alternative school or site that provides meals to students from several schools within the SFA. Procedures for maintaining applications and the counting and claiming of reimbursable meals for this type of school are the same as any other school site in the SFA.

One accepted procedure is for the alternative school to keep copies of the students' applications, direct certification eligibility, or roster with each student's eligibility on file from the "sending schools." The school which is providing meal service may claim reimbursement for eligible students in the proper category. In some situations a student's attendance in such a school may be short-term (a few days) or long-term (entire school year). Adjustments and notations should be entered on the meal counting and claiming records to justify the claim when applicable and to document current numbers of approved students. To the extent practical, there should be procedures in place to ensure that these students can't be accidentally claimed at two locations for the same meal.

If the SFA chooses to use a different procedure than the one mentioned here, please contact SCDE and the Office of Nutrition Programs.

### **Cooperative Schools**

Some SFAs participate in a type of alternative school, magnet school, charter school or school-of-choice that involves several cooperating SFAs. The guidelines discussed below should be followed when establishing procedures for maintaining applications, as well as counting and claiming reimbursable meals for this type of school.

If a student is eligible for free or reduced-price meal benefits in their home SFA, a copy of the approved application may be mailed to the SFA where the student attends school and consumes meals/snacks/milk. Applications should **never** be faxed. The application should be reviewed and initialed by a reviewing official of the SFA where the student attends school and consumes meals/snacks/milk. Reimbursement is claimed by the SFA of the site where the student eats meals/snacks/milk. To the extent practical, there should be procedures in place to ensure that these students can't be accidentally claimed at two locations for the same meal.

A student's attendance in a cooperative school may be short-term (a few days) or long-term (entire school year). Adjustments and notations must be entered on records to justify the claim and to document current numbers of approved students.

Specific procedures regarding the transmittal, chain-of-custody, and updating of confidential student eligibility data, as well as all other matters referenced above should be documented as part of the overall operating agreement executed between all participating SFAs.

### **Categorical Eligibility of Migrant Students**

"Migrant" students, as defined by the Migrant Education Program authorized by the federal Elementary and Secondary Education Act, are categorically eligible for free meal benefits. This status can be conferred by the CNP upon receipt of a list of eligible students certified by a SFA's local Migrant Coordinator. No further documentation is required. This status supersedes any application or other documentation submitted by an affected household.

### **Categorical Eligibility of Homeless and Runaway Students**

A student is categorically eligible for free meal benefits if he/she is categorized as "homeless" or "runaway" by the SFA liaison for the McKinney-Vento Homeless Assistance Act, the Runaway/Homeless Youth service provider or the director of a homeless shelter. This status can be conferred by the SFS program upon receipt of a certified list of eligible students. No further documentation is required. This status supersedes any application or other documentation submitted by an affected household.

#### **Change in Homeless Status**

School officials must work closely with the local SFA homeless liaison and directors of homeless shelters to ensure that children are provided free meal benefits as promptly as possible when needed and that the SFS program is promptly advised when children leave the school or are no longer considered homeless. When children are no longer homeless, school officials must provide the household with an application for free and reduced-price meals.

#### **Homeless Children Residing with another Household**

A child or family may temporarily reside with another household and still be considered homeless under the definition of homeless in the McKinney-Vento Homeless Assistance Act. In these cases the household size and income of the host family is not taken into consideration in determining the free meal eligibility for the children) designated as homeless by the local school SFA liaison. Additionally, when a host family applies for free and reduced-price meals for their own children, the host family may include the homeless family as household members of the host family provides financial support to the homeless family, such as shelter, utilities, clothing, or food. In such cases, the host family must also include any income received by the homeless family. School officials must determine eligibility for the host family in the traditional manner. However, free meal eligibility for the homeless child is based on the documentation provided by the local school district liaison, even when the child is included on the host family's free and reduced-price meal application. The host family's eligibility should be reevaluated when their household size decreases, i.e. the homeless family leaves.

### **Categorical Eligibility of Head Start and Even Start Students**

Head Start and Even Start students may be categorically eligible for free benefits when enrolled in programs.

### **Head Start**

Children enrolled in SFA-sponsored federally funded Head Start centers that meet the low-income criteria of Head Start Program regulations are considered categorically eligible for free meals. Verification of eligibility from the household is not required when documentation of categorical eligibility is obtained from Head Start officials. Examples of acceptable documentation of a child's Head Start participation include:

- An approved Head Start application for the child's family;
- A Agreement of enrollment in Head Start; or
- A list of children participating in Head Start.

### **Even Start**

For a child to be categorically eligible for free meals based on their participation in Even Start, the child must be enrolled as a participant in a federally funded Even Start Family Literacy Program and must be at the pre-kindergarten level. Categorical eligibility does not apply to other family members. Documentation of a child's participation in a federally funded Even Start Program is required to establish categorical eligibility for free meals. Confirmation that the child has not yet entered kindergarten must be included in the documentation from the Even Start official. Verification of eligibility from the household is not required when documentation of categorical eligibility is obtained from Even Start officials. Examples of acceptable documentation of a child's Even Start participation include:

- An approved Even Start application for the child's family;
- A Agreement of enrollment in Even Start; or
- A list of children participating in Even Start.

## **Categorical Eligibility of SNAP/TANF Recipients**

Households currently participating in the SNAP or TANF program are categorically eligible for free meal benefits. If the household is not directly certified, they must complete an application for benefits and provide the following information:

1. Name of student(s);
2. Current SNAP or TANF case number;
3. Signature of an adult household member.

No further information is required for the application to be considered complete.

The South Carolina Department of Social Services (DSS) provides some families with Electronic Benefits Transfer (EBT) cards. These cards (with a 16 digit account number) are used like debit cards by the families receiving benefits. EBT card numbers are **not** acceptable on the application and do not automatically qualify students for CNP benefits. SFAs must be careful when reviewing applications to ensure that SNAP and TANF case numbers appear to be valid. If the household provides a questionable SNAP/TANF number the SFA may:

- Approve/deny the application based on the household's size and income information provided;
- Call the local DSS office to verify that the household is receiving SNAP/TANF benefits (document the correct case number provided by DSS on the application);
- Deny eligibility until a complete application can be obtained.

If a household has provided a valid SNAP or TANF case number and also reports income, the eligibility determination should be based on the fact that the children are eligible for SNAP or TANF benefits. Students eligible for benefits through the Food Distribution Program on Indian Reservations (FDPIR) receive SNAP and/or TANF benefits and are also categorically eligible. The FDPIR is not operated as a separate program in South Carolina.

In August 2009, USDA issued updated policy guidance requiring SFAs to extend categorical free meal eligibility to all other children included on an application when any child in the household is receiving SNAP/TANF benefits. Any income information on applications should be disregarded. The eligibility status of these students remains in effect from the first day that the application is approved in the current school year through the 30<sup>th</sup> operating day of the next school year. In addition, newly enrolled siblings may be added. For additional information, see [Chapter 10 – Determining Eligibility](#).

### **Error in Eligibility Determination Discovered**

Q-22 *An application was approved for benefits and the household was notified. During a review of the applications later in the school year, the reviewer discovered that the reviewing official has erred and that the information on the application did not support the household's eligibility for benefits. What should be done?*

A Whenever there is a reduction or termination of benefits in the same school year, for any reason, the household must be provided the 10-calendar day advance written notice of adverse action. When there is an increase in the level of benefits, the household must be notified and the increase in benefit level provided within a three-day period. (See section entitled, "[5. Complete Confirmation Reviews of Applications in Sample](#)" in [Chapter 11 – Verification of Eligibility](#) in this *Program Reference Manual* for additional information, instructions and form letters that may be used to notify the household.)

## **Participation of Adults in the National School Lunch Program**

The National School Lunch Program (NSLP) is a food assistance program for children. The fact that an adult may be in the Even Start Literacy Program and/or taking remedial or other classes has no bearing on whether the adult is eligible for participation in the NSLP. The only times meals to adults are eligible for reimbursement under the NSLP are when the adults are:

- Enrolled in a General Educational Development (GED) program that meets in the school during the school day, or
- Enrolled in a school of high school grade or under and, therefore, meeting the definition of "child".

In the latter case, the adult student would be included in the SFA's total enrollment of students for funding and other purposes, the same as other students of high school grade or under.

Any adults meeting one of the above criteria who wish to obtain free or reduced-price benefits under the NSLP must complete an application for meal benefits.

## Eligibility Based on Direct Certification

Direct certification is the process by which certain students are automatically approved for free and reduced-price meals due to information provided by a state or local agency (for example the South Carolina Department of Social Services) or other authorized individual (for example the director of a homeless shelter). For additional information, instructions and letters that can be used see Chapter 10 – Determining Eligibility in this *Program Reference Manual*.

### Use of Automated Systems in Application Approval Process

The use of automated systems in the approval process of applications for free and reduced-price meals has increased in recent years. In an automated system, the manual completion of the eligibility section on the application form is counterproductive. It is acceptable for SFAs with automated systems to disregard the manual completion of this section. The SFA's system must have the capacity to generate a listing of all students on applications, the basis of approval, the eligibility status, the date of approval, and other significant dates, such as withdrawal and reentry.

### Release of Eligibility Determination

The information on applications must be kept confidential. However, USDA has authorized SFAs to release student free and reduced-price school meal eligibility status under specific circumstances only. Aggregate data on children eligible for these benefits is allowed, but Section 108 of Public Law 103-448 authorizes the disclosure of individual children's free and reduced-price school meal eligibility status for certain federal and state education programs. Refer to Chapter 5 – Confidentiality & Disclosure of Eligibility provided in this *Program Reference Manual* for additional information. A waiver of confidentiality by the child's parent/guardian is still required whenever eligibility status is released with an individual student name to any other program.

### Access to Information by Noncustodial Parents

Q-23 *May a noncustodial parent obtain information on the application?*

A No. The free and reduced-price meal application information may not be released to anyone (including a noncustodial parent) for non-program purposes without the written consent of the adult who signed the application or presentation of a subpoena or other court order.

### Record Keeping

All free and reduced-price applications, and other documentation listed below, must be kept on file for a minimum of three years after the end of the fiscal year to which they pertain. However, if audit findings have not been resolved, the documentation must be retained until the audit is closed.

- Applications (free and reduced-price) approved for benefits;
- Applications from households denied benefits and denial letters sent to them;
- Inactive/withdrawn applications;
- Direct certification lists or electronic files from DSS;

- Direct certification notification letters sent to households by DSS;
- Letters sent by the SFA to households on the direct certification list/electronic file.

For applications from households approved for benefits, the reviewing official should:

- Indicate the date each application is approved;
- Indicate the level of benefit for which each student is approved;
- Sign or initial the application.

For applications from household denied benefits, the reviewing official must:

- Identify the reasons for the denial;
- Record the date of the denial;
- Record the date the denial notice is sent;
- Sign or initial the application.

In manual systems, these notes are indicated on the bottom of the application form in the area reserved for information recorded by the reviewing official. In an automated system, the level of benefits for which a student was approved (or denied) and the date of the determination should be indicated by the student's name on the computer printout.

### **Using Automated Systems**

Q-24 *In a computerized operation where the computer generates the determination, does the reviewing official have to sign or initial each application?*

A No. However, the computer system should be able to capture the original date of approval and to update the status of applications to account for transfers, withdrawals, terminations, and other changes.

When a student's eligibility changes or the student transfers to another school, the date of change or transfer should be noted on the application or any roster used and/or otherwise maintained. Current applications must be on file and there must be records to support transfers of students out of the school.

### **Computer-Based Records**

Q-25 *May changes in status of an application be maintained in a computer instead of being noted on the application?*

A Yes. Changes in the status of an application may be maintained in a computer instead of being noted on the application. School officials must ensure that the changes are readily retrievable by school and are provided to state and federal reviewers along with the applications during a review of the applications.

## **Application Retrieval**

Applications should be maintained at a central location. Applications must be readily retrievable by school which means that when called upon to do so for purposes such as administrative reviews, school officials must be able to separate the applications for an individual school from the others in the SFA in order to support the reviewed school's claim for reimbursement.

There are several filing methods available. One possibility is to create separate files for each attendance center. If households apply for several students in more than one attendance center, a copy of the application would be made for each attendance center file.

When an automated system is used, the required information (as listed in the previous section entitled "Record Keeping") must be available not only on a current basis but also for prior months. When printouts are used for issuing the medium of exchange, updates provided for the cashier should be added to the master printout with the date that the update became effective. If and when an updated master printout is issued to the cashier, it should be cross-checked with the printout that is currently in use. Any discrepancies should be resolved with the central office and the previously used printout should not be discarded but retained as documentation that supports prior months' reimbursement claims.

SFAs using a computerized system to determine eligibility are not required to complete the "school use" section of the application as long as eligibility determination can be tracked by roster or other documentation. Changes to household size, income, etc. must be documented on the application form as well as on the computer or electronic database. The application form is the official source document from which eligibility is determined.

## **Maintaining Rosters and/or Eligibility List**

The Administrative Review process requires the availability of rosters that are specific to the month being reviewed and correlate to the use of household applications. To ensure compliance with this requirement, rosters for **each school or feeding site** should be maintained as follows:

1. A roster should be generated each month that reflects the total enrollment and eligibility status of all students as of the last serving day of that month;
2. Names on the roster should be separated by free, reduced-price, paid/denied, withdrawn, or temporary status;
3. The separate listings of free or reduced-price students should then be organized in numeric order by application number. Paid students may be organized by alphabetical order or other existing unique identifier;
4. Each separate listing should have a total of students by eligibility status;
5. These rosters should be retained with their respective eligibility documentation and are subject to normal record retention schedules;
6. These rosters should be maintained separately from any emergency rosters that are produced for manual processing of meal counts at schools during a service outage of a point-of-sale system; and
7. Even with the use of automated application processing systems, hard copies of rosters should be maintained as software issues may impact the future accuracy of historical

records, particularly among students whose eligibility status changes during the school year.

In the interest of conservation, a SFA has the option of maintaining this information in an **extracted electronic file that is exported monthly and stored separately** from their automated application processing system. That electronic file must be formatted and/or stored in such a fashion that its contents can't be altered by future data entries. The file must allow for the generation of a monthly paper roster that contains all of the required information.

## Direct Certification for Free Meal Benefits

### Definition and Basic Requirements

All school food authorities (SFA) that accept household applications as a method of determining free or reduced eligibility are required to participate in the state's Direct Certification (DC) process. The DC process is managed by the South Carolina Department of Education (SCDE) and reported via the South Carolina Automated Payment System (SCAPS).

The DC process matches student enrollment records (for those SFAs that utilize the PowerSchool student data management system) throughout the school year with SC Department of Social Services (DSS) eligibility records for Supplemental Nutrition Assistance Program (SNAP a.k.a. food stamps) and Temporary Assistance to Needy Families (TANF). As of the 2013-2014 school year, this process was expanded to include DSS records of all children placed in the state's Foster Care system. For those SFAs without PowerSchool availability, a match list will not be available. However, access is provided to a searchable database to allow those SFAs the ability to locate children and create their own match list.

It is important to note that Medicaid program eligibility cannot be used as a source for direct certification or other approval for free or reduced meal benefits.

### Eligibility Determination

Children identified through the DC process are automatically designated as Free from the date the match is identified through the first thirty (30) operating days of the following school year. All DC records should be treated with the same level of privacy and confidentiality as other free-and-reduced eligibility documentation. Households whose children are directly certified through use of this list are considered verified as well.

The list may not be distributed to anyone other than those directly responsible for determining program eligibility and should never be faxed.

Documentation supporting direct certification must be maintained for three years plus the current operating year.

## Carrying Benefits Forward From Previous Year

Q-1 *If a child was directly certified during the prior school year, may his/her benefits be carried forward to the current school year?*

A Prior year direct certification benefits may be carried forward only for the first 30 operating days of the current school year. If the child is not on the new list of directly certified students and an application is not received from the household during this period, benefits must be terminated no later than the 31<sup>st</sup> operating day of the new school year.

## Content of Direct Certification List

Q-2 *Is the direct certification list a complete listing of all children in the SFA eligible for free meal benefits?*

A No. There are three methods by which a child can receive free meal benefits: by homeless designation, direct certification and by application. Directly certified children are eligible to receive free meals for the current school year without further application. All other households must complete the application process in order to be certified as eligible for free or reduced-price benefits.

## Sharing Direct Certification Lists

Q-3 *May direct certification data be released to individuals or other school program departments for non-program purposes?*

A No. Direct certification data is subject to the same confidentiality provisions as any other meal eligibility information.

## Direct Certification of Siblings

If at least one (1) child in a household is identified as having DC status on the basis of SNAP or TANF benefits, then all children in that household are eligible for free meal benefits and should be considered as also having DC status. In instances where these additional children may not be identified through the regular DC process, SFAs are required to make all reasonable efforts to identify these additional children. Documentation to support common residency can be provided through student enrollment records or the completion of a household eligibility application.

Any income information on applications should be disregarded. The eligibility status of these students remains in effect from the first day that their household relationship can be confirmed in the current school year through the 30<sup>th</sup> operating day of the next school year. In addition, newly enrolled siblings may be added so long as documentation is available. Appropriate measures should be taken to identify these children as directly certified and exempt them from verification requirements.

Note that this guideline does not apply to foster children, students enrolled in Head Start or Even Start programs, or those students certified as free under the Migrant Education Program.

### **Students Who Transfer**

**Q-4** *If a student who is directly certified transfers from one SFA to another, does that certification also transfer?*

**A** Yes. Eligibility for free meals that results from direct certification does transfer from one SFA to another when proof of direct certification is transferred with the student.

### **Effects of Direct Certification on Verification**

Households whose children are determined eligible through the use of the direct certification list are exempt from verification requirements. When the SFA count of applications on file on October 1 is taken for the purpose of determining the number of applications to be verified, children directly certified should not be included in the count. Also, directly certified children should not be counted as verified. Implementation of direct certification will reduce the SFA's verification effort by reducing the number of applications on file, thus reducing the minimum required verification sample.

### **Notification of Predetermined Eligibility**

It is required that a written notice be sent to each household certified as eligible for free meal benefits through direct certification. The notice must state:

- The names of their children eligible for free meals;
- No further application is required; and
- How to notify the school or SFA if they do not want their children to receive free benefits.

Use the Notification of Predetermined Eligibility (Direct Certification) letter (Form 10b-A), provided at the end of this chapter, to notify households of their eligibility based on direct certification. Complete the letter by entering the name, address and telephone number of the contact person and the signature of the authorized representative in the signature block before reproducing it on SFA letterhead. The school name can be deleted at the SFA's option. It is strongly recommended that no further reformatting be done.

## **Copy of Notification Letter**

**Q-5** *Is it required that the SFA retain a copy of Form 10b-A, Notification of Predetermined Eligibility (Direct Certification) sent to each directly certified household?*

**A** No. The SFA must retain a copy of the prototype letter provided with the SFA's Policy Statement for Free and Reduced-Price Meals but not a copy of each letter sent. Note the date the letter was provided to each household on the list beside the child's name or use another method compatible with the SFA's existing systems.

## **Notifying Households No Longer Enrolled**

**Q-6** *Must Form 10b-A, Notification of Predetermined Eligibility (Direct Certification) be sent to the parent or guardian of children listed as directly certified but who are no longer enrolled in the SFA?*

**A** No. Children who are no longer enrolled are not eligible for free meal benefits.

## **Distribution of Applications**

The distribution of the letter to parents and application forms to households of all children enrolled in the SFA at the beginning of the school year is required to ensure that no child is inadvertently excluded from participation. SFAs that implement direct certification are not required to send the letter to parents and application form to those households eligible under direct certification if these materials are distributed through the mail, individual student packets, or other methods that prevent the overt identification of children eligible for direct certification. Under this option, households will receive either a letter to parents with an application or a letter notifying them their children are eligible for free benefits.

## **Predetermined Eligible Submitting an Application**

One of the difficulties encountered by reviewing officials with regard to the direct certification process is that households submit an application even after they have received the notification of predetermined eligibility. In an attempt to reduce the number of applications received for directly certified students, school officials are encouraged to send the notification of predetermined eligibility as early as possible. However, direct certification takes precedence over any application, regardless of reported income.

## **Delivery of Benefits**

The SFA must provide benefits promptly. Eligible children must receive benefits immediately and the SFA may assume consent if refusal has not been received within a certain number of days, as determined by the SFA.

If the household refuses benefits, the SFA must discontinue benefits immediately and must document the refusal, preferably with a written note from the household.

## **Expiration of Categorical Eligibility**

Because of year-long duration of eligibility, households are no longer required to report changes in their categorical eligibility status. However, households may voluntarily report a change. If a household reports a change that may reduce or terminate benefits, the SFA must explain to the household that the change does not have to go into effect but, that at the household's request the change will go into effect. If the household wants the change to go into effect, the SFA must provide a notice of adverse action. (See form provided in Chapter 11 – Verification of Eligibility in this *Program Reference Manual*.)

## **Record Keeping**

SFAs must keep documentation for direct certification on file for a minimum of three years after submission of the final claim for reimbursement for the fiscal year to which they apply. Documentation must be kept longer if they are required by an audit as long as required for resolution of the issues raised by the audit.

Documentation should be maintained at a central location with a list of eligible children maintained at the school. Children's categorical eligibility status must be readily retrievable by school and the SFA must ensure that any changes and transfers in and out of the school are accurately and promptly reflected on each school's list.

**Notification of Predetermined Eligibility (Direct Certification)**

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*

<Date>

Dear Parent/Guardian:

Because you have a foster child(ren) in your household and/or are currently eligible to receive benefits through the Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF), each child listed below has been pre-approved to receive **FREE** meals at school.

_____	_____
_____	_____
_____	_____
_____	_____

**If you want your children to get free meals, do nothing.  
If you have other children in your household who are not listed, contact our office immediately.  
If your child brings home an application for free or reduced-price meals do not fill it out.  
If you do NOT want your children to receive free meals, return the bottom portion of this letter to the address below.**

If any of the information listed above is incorrect or if you have any questions, please contact:

Name: <Reviewing Official>  
Title: <RO Title>  
Address: <RO Address>  
Phone: <RO Phone>

Sincerely,

<Authorized Representative's Signature>

<Authorized Rep's Name>  
<Authorized Rep's Title>

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly.** In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability. To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

*(Cut and return lower portion if desired.)*

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

I do NOT want my child(ren) to receive free meals: (List names below)

\_\_\_\_\_  
\_\_\_\_\_

Signature of Parent or Guardian: \_\_\_\_\_

# Special Assistance Provisions

## Determining Eligibility for Free and Reduced-price Meals and Reimbursement Claim Procedures

Three Special Assistance Provisions are available to School Food Authorities (SFAs) and schools for determining meal eligibility and claiming meals for federal reimbursement monies. Two Provisions or options (A and B) have been included in the SFA's free and reduced-price Policy Statement issued by the South Carolina Department of Education (SCDE) in the final attachment for a number of years. Additional guidance on Provision 2 and Provision 3 has been issued by the U.S. Department of Agriculture (USDA). SFAs with high percentages of free and reduced-price eligibility may wish to consider participation.

### Provision 1

In schools where at least 80 percent of the students enrolled qualify for free or reduced-price meals, applications may be approved for a two-year period instead of one. The major qualifying factor to participate in this Provision is to document the 80 percent eligibility based on March enrollment during the base year. Under this Provision the school must only approve meal applications every other year. Other record keeping requirements remain the same for claiming meals, etc. A correctly approved application for free or reduced-price meals would be valid for two years. Schools would be required to send a meal application to all other enrolled students to ensure no student was denied free or reduced-price meal benefits if eligible during the second year of the Provision.

### Provision 2

This Provision allows schools to provide free meals to all students regardless of eligibility for program benefits for up to four years including the base year of the Provision. This universal free program has many benefits including the obvious reduction in paperwork; however, it is best implemented in schools and/or SFAs where the majority of students are currently eligible for free and reduced-price meal benefits. The SFA must be financially able to replace the student revenue not collected from full paying and reduced-price students. After the base year when applications are processed and meal counts are obtained for each claiming category, reimbursement is based on percentages and actual daily meal counts for free, reduced-price, and paid are not required.

### Provision 3

This Provision allows schools to receive a comparable level of federal cash and commodity support each year as it received in the base year, provided the school serves all meals at no charge. The base year is the last year eligibility determinations and meal counts by category are obtained under program rules. Reimbursable meals are served at no charge to all participating students for a period up to four years or longer if an extension is granted. The level of federal cash and commodity support is adjusted to reflect annual changes in enrollment and inflation.

Optional provisions for determining eligibility and claiming meals under the National School Lunch and Breakfast Programs are a result of paperwork reduction allowed in Section 9 of Public Law 95-166 and Amendment 19 to Part 245.9 of the program regulations. [Table 10c.1 - Special Assistance Alternatives](#) provided below shows a comparison of the major elements of Provision 1, Provision 2, and Provision 3. Continuing after the table is a more detailed explanation of each Provision.

## Chapter 10c – Special Assistance Provisions

**Table 10c.1 – Special Assistance Alternatives**

In an effort to reduce paperwork at the local level, Congress has incorporated into Section 11(a)(1) of the National School Lunch Act three alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced-price school meals and daily meal counts by type (free, reduced-price and paid meals) at the point of service.

Provision 1	Provision 2	Provision 3
<ul style="list-style-type: none"> <li>▪ This Provision reduces application burdens by allowing free eligibility to be certified for a two-year period.</li> <li>▪ In schools where at least 80 percent of the children enrolled are eligible for free or reduced-price meals, annual notification of program availability and certification of children eligible for free meals may be reduced to once every two consecutive school years. All other households must be provided a meal application and are allowed to apply for meal benefits each school year. There is no requirement to serve meals at no charge to all students.</li> <li>▪ Schools must continue to record daily meal counts of the number of meals served to children for reimbursement claims.</li> <li>▪ Provision 1 has been an option for schools since publication of regulations in 1980.</li> </ul>	<ul style="list-style-type: none"> <li>▪ This Provision reduces application burdens and simplifies meal counting and claiming procedures. It allows schools to establish claiming percentages and to serve all meals at no charge for a four-year period.</li> <li>▪ Schools must serve meals to all participating children at no charge for up to four successive years. During the first year, or base year, the school makes eligibility determinations and takes meal counts by type. During the next three years, the school makes no new eligibility determinations and counts only the total number of reimbursable meals served each day. Reimbursement during these years is determined by applying the percentages of free, reduced-price and paid meals served during the corresponding month of the base year to the total meal count for the claiming month. The base year is included as part of the four years.</li> <li>▪ At the end of each four-year period, the state agency may approve four extensions if the income level of the school’s population remains stable.</li> <li>▪ Schools selecting this alternative must pay the difference between federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than federal funds.</li> <li>▪ Provision 2 has been an option for schools since publication of regulations in 1980.</li> </ul>	<ul style="list-style-type: none"> <li>▪ This Provision reduces application burdens and meal counting and claiming procedures. It allows schools to simply receive the same level of federal cash and commodity assistance each year, with some adjustments, for a four-year period.</li> <li>▪ Schools must serve meals to all participating children at no charge for up to four successive years. These schools do not make additional eligibility determinations. Instead, they receive the level of federal cash and commodity support paid to them for the last year in which they made eligibility determinations and took meal counts by type; this is the base year. For each of the four years, the level of federal cash and commodity support is adjusted to reflect changes in enrollment and inflation. The base year is not included as part of the four years.</li> <li>▪ At the end of each four-year period, the state agency may approve four-year extensions if the income level of the school’s population remains stable.</li> <li>▪ Schools electing this alternative must pay the difference between federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than federal funds.</li> <li>▪ Provision 3 has been an option for schools since 1995 through an implementing memorandum.</li> </ul>

## **Special Assistance Provision 1**

The National School Lunch Program (NSLP) regulations contain a clause known as Provision 1. The purpose of this regulatory Provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications. Provision 1 allows SFAs with schools having 80 percent or more of their students eligible for free or reduced-price meals to extend eligibility for such benefits for a two-year period based on the first year's applications.

### **Requirements in Base Year**

- Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the required public announcement that is regularly published at the beginning of the school year.
- Meal counts are taken and claimed for reimbursement using standard procedures, i.e. by the eligibility category of the child receiving the meal.
- Participating schools must document that 80 percent of the enrollment during March is eligible for free and reduced-price meals.

### **Requirements in Year 2**

- To continue under this Provision the second year, the 80 percent free and reduced-price eligibility criteria must be met.
- Distribution of applications and eligibility determinations may be limited to newly enrolled students and to reduced-price/full paid students seeking an increase in benefit level. In no event may a student be denied a free or reduced-price meal because of ineligibility the first year of the Provision.
- A correctly approved free/reduced-price meal application from the base year would be valid during the second year.
- Schools selecting this Provision must continue to take daily counts of the number of students served a reimbursable meal.

**Table 10c.2 – The Provision 1 Cycle**

Base Year	→	Collect applications Count meals by category
2 <sup>nd</sup> Year	→	Use same applications Count meals by category

## **Special Assistance Provision 2**

The NSLP regulations contain a clause known as Provision 2. The purpose of this regulatory Provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications, notifying the public, and counting meals by category for schools that agree to serve all enrolled students free meals. In accordance with this Provision, the SFA agrees to pay from other than federal funds any program costs not covered by program income.

## Chapter 10c – Special Assistance Provisions

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### Requirements in Base Year

- Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the required public announcement that is regularly published at the beginning of the school year.
- After all applications have been received and approved, a second public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- Meals are served free to all students.
- Meal counts are taken and claimed for reimbursement using standard procedures, i.e. by the eligibility category of the child receiving the meal.
- If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service program costs, non-federal funds must be used to pay the difference.
- During the base year, a complete review of the food service operation by the Office of Health and Nutrition, SCDE will be conducted to document and assure the accuracy of the current methods being used by the SFA to determine free, reduced-price, and paid categories, and counting and claiming procedures used to report claims for reimbursement.
- The percentage of the total meals is calculated monthly by school and by program for each category. This information is gathered in the base year for use in the following years to establish the reimbursement claims.

### Requirements in Years 2, 3, and 4

- At the beginning of each school year, a public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- No distribution of applications and no eligibility determinations are conducted.
- Officials count only total meals served and apply the monthly percentages developed during the base year to determine the counts by type for the reimbursement claims.
- If the reimbursement received by the SFA is not sufficient to cover the total nonprofit school food service program costs, non-federal funds must be used to pay the difference.

### Requirements Beyond Year 4

- The state agency may authorize schools participating under Provision 2 to extend their current cycle and establish claiming percentages without going through the meal application process again. However, available socioeconomic data approved by USDA must indicate that the income level of the school populations has remained the same since the base year.

**Table 10c.3 – The Provision 2 Cycle**

Base Year	→	Count applications Count meals by category All students eat free
2 <sup>nd</sup> Year	→	Claiming percentages applied to total meal count
3 <sup>rd</sup> Year	→	Claiming percentages applied to total meal count
4 <sup>th</sup> Year	→	Claiming percentages applied to total meal count

### Special Assistance Provision 3

The NSLP regulations contain a clause known as Provision 3. The purpose of this regulatory Provision is to reduce the burden of paperwork on parents and on SFAs by reducing the requirements for taking applications, notifying the public, and counting meals by category for schools that agree to serve all enrolled students free meals. In accordance with this Provision, the SFA agrees to pay from other than federal funds any program costs not covered by program income.

#### Requirements in Base Year

- Applications are distributed, and free and reduced-price eligibility determinations are made using the standard procedures, including the public announcement that is regularly published at the beginning of the school year.
- After all applications have been received and approved, a second public notice can be made stating that all meals will be provided free to all students regardless of economic status. Serving meals free to all students is encouraged during the base year of Provision 3, but is not required.
- Meals are served free to all students if the school chooses to begin during base year.
- Meal counts are taken and claimed for reimbursement using standard procedures, i.e. by the eligibility category of the child receiving the meal.
- If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service program costs, non-federal funds must be used to pay the difference.
- Because the base year establishes the levels of support for the four successive non-base years to follow, the school should maximize participation of all students and ensure that reimbursable quality meals are served.

#### Requirements Years 2, 3, 4, and 5

- At the beginning of each school year, a public announcement is made stating that all meals will be provided free to all students regardless of economic status.
- No distribution of applications and no eligibility determinations are conducted.
- Schools receive the level of federal cash and commodity support paid to them during the base year. Total meal counts are taken for management purposes only. Federal cash and commodity support is adjusted to reflect changes in enrollment and inflation.
- If the reimbursement received by the SFA is not sufficient to cover total nonprofit school food service costs, non-federal funds must be used to pay the difference.

#### Requirements Beyond Year 5

- SCDE may authorize schools participating under Provision 3 to extend their current cycle if socioeconomic data is reflective of the school's population, provides equivalent data for both the base year and the last year of the current cycle, and demonstrates that the income of the school's population remained stable, declined, or had negligible improvement.

## Chapter 10c – Special Assistance Provisions

**Table 10c.4 – The Provision 3 Cycle**

Base Year	→	Collect applications Count meals by category All students eat free (option)
1 <sup>st</sup> Year	→	Base year reimbursement/commodity support adjusted for increases/decreases in inflation and enrollment  All students eat free
2 <sup>nd</sup> Year	→	Base year reimbursement/commodity support adjusted for increases/decreases in inflation and enrollment  All students eat free
3 <sup>rd</sup> Year	→	Base year reimbursement/commodity support adjusted for increases/decreases in inflation and enrollment  All students eat free
4 <sup>th</sup> Year	→	Base year reimbursement/commodity support adjusted for increases/decreases in inflation and enrollment  All students eat free

### Policy Statement

To participate in Provision 2 or Provision 3, the SFA must submit an *Amendment to the Policy Statement for Free and Reduced-Price Meals* prior to implementation. The SFA must agree to serve free meals to all enrolled students regardless of income eligibility. Provision 2 requires schools to serve all meals free during the base year. Provision 3 encourages but does not require that all meals be served free during the base year. However, since the base year drives the level of reimbursement and commodities received for the next four successive years, it is in the best interest of the SFA to optimize meal participation throughout the base year under both Provision 2 and Provision 3.

### Public Notifications/Applications/Certification

In the base year letters and applications are sent to the parents of students prior to the beginning of the school year. Applications from the prior year cannot be carried over to determine base year eligibility percentages. Direct certification information based on current participation in the Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps) or Temporary Assistance to Needy Families (TANF) program may be used. In the base year, after the applications have been returned to the SFA for eligibility determinations, a second notice is published stating that all enrolled students will be allowed to eat breakfast and lunch at no charge regardless of income eligibility. In years two, three, and four after the base year under Provision 2, applications are not distributed and no eligibility determinations are made. At

## **Chapter 10c – Special Assistance Provisions**

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the beginning of each school year in years two, three, and four, a public announcement is made stating that all meals will be provided free to all students regardless of economic status. The same application and notification process applies to Provision 3 with the exception that the base year is not included in the four-year cycle and the SFA is not required to provide all meals free during the base year.

### **Reimbursement**

During years two, three and four of serving students free under Provision 2, the school must continue to record and report a daily total meal count. This meal count will be the basis for monthly reimbursement calculations for years two, three and four submitted to SCDE for payment. During the base year, standard procedures for counting and claiming meals for reimbursement are followed. In years two, three and four, participating schools must only complete total meal counts each day. The monthly meal count total will then be multiplied by the percentages for each category established for the same month in the base year to determine free, reduced-price, and paid meals to claim. This information will be consolidated into the SFA's total meal count by category to determine the full amount of the reimbursement claim. To reflect increases/decreases in enrollment for each school year, the number eligible for free, reduced-price, and paid should be updated as of October 31 of each year. However, the sum of the three categories must not exceed the enrollment. Forms 10c-A, 10c-B, and 10c-C are included at the end of this chapter for use in compiling the required data for calculating Provision 2 claims.

During years two, three, and four following base year of Provision 3, the actual claim amount for reimbursement will be the same as the corresponding month from the base year with adjustments made for increases and/or decreases in enrollment and inflation.

Forms 10c-D and 10c-E provide guidance on compiling claims under Provision 3.

### **Escape Clause**

An SFA operating under Provision 2 or Provision 3 may return to standard application and eligibility determination procedures at the end of the school year if standard procedures better suit their program needs. However, in doing so, the SFA is responsible for notifying parents of the decision and for accepting the consequences of discontinuing the local commitment to providing meals at no cost to students who are not eligible for federal free meal reimbursement.

### **Provision 2 and Provision 3 Extensions**

School districts that wish to continue Provision 2 or Provision 3 after the initial four-year cycle has been completed may elect to renew for an additional four-year cycle. To qualify for renewal of either Provision 2 or Provision 3, the SFA should request an extension from SCDE and provide documentation that the socioeconomic status of the SFA population and income levels have remained stable or have declined during the four years of the program.

## Chapter 10c – Special Assistance Provisions

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Approved sources of data to be used to document the socioeconomic state of the SFA population include:

- Local data collected by the Chamber of Commerce or economic planning offices in the city or county;
- Census track data compiled for the local area covering most of the SFA population;
- Unemployment data for the area from which the SFA draws attendance;
- Direct certification data from the four previous years; and
- Other local data as approved by the state agency.

Subsequent reapplication for four-year extensions may be requested from the state agency after the first four year cycle is completed. This request would also be based on socioeconomic data.

### Maximize Eligibility and Participation

The secret ingredient for either Provision 2 or Provision 3 is to have an excellent base year in terms of eligibility certifications (approved meal applications and direct certification) and meal participation. To earn the maximums in reimbursement during the years following the base year, high meal participation is critical, especially for free and reduced students. As a school and/or SFA participating in either Provision 2 or Provision 3, successful programs will depend on high program revenues in the form of reimbursement to offset the student revenues lost from paying customers. High participation or participation of all eligible free students should be the goal as monthly claiming percentages are established during the base year.

### Controlling Meal Cost

Monitoring all costs associated with providing meals will be extremely important during the base year. Through careful menu planning and effective use of labor, meal costs must be kept low and within the constraints of program revenues-current and projected. Using Form 10c-F and current rates of reimbursement and commodity value, the SFA may prepare a cost analysis for both the breakfast and lunch program with and without Provision 2 or Provision 3. The SFA will need to know the break even point when all students are provided meals at no cost.

For additional information about Provision 1, Provision 2 and Provision 3, contact the Office of Health and Nutrition, SCDE at (803) 734-8187.

## Monthly Percentage Calculation – Base Year of Participation

For Schools Participating in Special Assistance Provision 2

School: \_\_\_\_\_ Month/Year: \_\_\_\_\_

School Food Authority (SFA): \_\_\_\_\_

(A) Monthly Total of Free Meals Served to Eligible Children	(B) Monthly Total of Meals Served to All Children	Percentage Free (A ÷ B) x 100 = %
Example: 4000	6000	(4000 ÷ 6000) x 100 = 67%
Breakfast:		
Lunch:		

(A) Monthly Total of Reduced-Price Meals Served to Eligible Children	(B) Monthly Total of Meals Served to All Children	Percentage Reduced-Price (A ÷ B) x 100 = %
Breakfast:		
Lunch:		

(A) Monthly Total of Paid Meals Served to Eligible Children	(B) Monthly Total of Meals Served to All Children	Percentage Paid (A ÷ B) x 100 = %
Breakfast:		
Lunch:		

**Instructions:**

To be completed monthly during base year. Percentages must be established for breakfast and lunch for each category. These three percentages calculated for each month of the base year participating under Provision 2 shall be multiplied by the corresponding monthly meal count total of all reimbursable meals served to children in the second, third and fourth consecutive school years under Provision 2.

The SFA must complete this percentage calculation for each month meals are served during the base year for each school participating in Provision 2. These percentages must be used to determine meal claims for the second, third, and fourth consecutive school years. A summary of these percentages may be recorded on Form 10c-B – Summary of Percentages - Base Year.

Form Completed By (Name) \_\_\_\_\_

Date \_\_\_\_\_

**Summary of Percentages – Base Year**  
For Schools Participating in Special Assistance Provision 2

School: \_\_\_\_\_

Program:  Breakfast Program  
(Separate form for each)  Lunch Program

School Food Authority (SFA): \_\_\_\_\_

Summary Base Year Student Meal Counts					Summary Base Year Percentages			
Month and Year	Free Meals Served (A)	Reduced-Price Meals Served (B)	Paid Meals Served (C)	Total Student Meals (D) (A+B+C)	Free % (E) (A÷D)x100	Reduced-Price % (F) (B÷D)x100	Paid % (G) (C÷D)x100	Total % (H) (E+F+G)
July 2_____								
August 2_____								
September 2_____								
October 2_____								
November 2_____								
December 2_____								
January 2_____								
February 2_____								
March 2_____								
April 2_____								
May 2_____								
June 2_____								

**Instructions to claim reimbursement: Apply monthly percentages during the base year (shown in columns E, F, and G) to the monthly number of total student meals served in the second, third and fourth years.**

Form Completed By (Name) \_\_\_\_\_

Date \_\_\_\_\_

## Reimbursement Claims Calculation – 2<sup>nd</sup>, 3<sup>rd</sup>, and 4<sup>th</sup> School Year

For Schools Participating in Special Assistance Provision 2

School: \_\_\_\_\_

Program:  Breakfast Program  
 (Separate form for each)  Lunch Program

School Food Authority (SFA): \_\_\_\_\_

Claim Month: \_\_\_\_\_ Year: \_\_\_\_\_

**Instructions to claim reimbursement:** Apply monthly percentages obtained during the base year to the monthly number of total student meals served in the second, third and fourth years to determine claim for free, reduced-price and paid reimbursement.

Form Completed By (Name) \_\_\_\_\_ Date \_\_\_\_\_

Total Number Meals Served (A)	Corresponding Monthly Percentage from Base Year (B)	Current Month's Claim (C)
Total Meals: _____	X Free _____% =	Free Meals: _____
	X Reduced _____% =	Reduced Meals: _____
	X Paid _____% =	Paid Meals: _____
Example:  5100	X Free        90        % = (5100 x .90)	Free Meals:        4,590
	X Reduced     4        % = (5100 x .04)	Reduced Meals:    204
	X Paid         6        % = (5100 x .06)	Paid Meals:        306

Note: During the second, third, and fourth year of operation, the reimbursement will be on meal count and the corresponding month's percentages (free, reduced-price, and paid) from the base year of operation under Provision 2.

**Instructions:**

1. Record total reimbursable meals served during the month in column A.
2. Record the percentage free, reduced-price, and paid from the corresponding month of the base year in column B.
3. Multiply the total meals for the month (column A) by the percentage (column B) to find the number to be claimed for free, reduced-price, and paid categories (column C).

**Summary of Meals Claimed – Base Year**  
For Schools Participating in Special Assistance Provision 3

School: \_\_\_\_\_

Program:  Breakfast Program  
(Separate form for each)  Lunch Program

School Food Authority (SFA): \_\_\_\_\_

Base Year: \_\_\_\_\_

Enrollment on Oct. 31 of Base Year: \_\_\_\_\_

Base Year Student Meal Counts				
Month and Year	Free Meals Served (A)	Reduced Price Meals Served (B)	Paid Meals Served (C)	Total Meals (D) (A + B + C)
July 20_____				
August 20_____				
September 20_____				
October 20_____				
November 20_____				
December 20_____				
January 20_____				
February 20_____				
March 20_____				
April 20_____				
May 20_____				
June 20_____				

**Instructions:** The number of meals served by category must be recorded in the base year for use during the following four years of Provision 3.

Form Completed By (Name) \_\_\_\_\_

Date \_\_\_\_\_

## Meals Claimed Calculation – Non-Base Year of Participation

For Schools Participating in Special Assistance Provision 3

School: \_\_\_\_\_ Month/Year: \_\_\_\_\_

School Food Authority (SFA): \_\_\_\_\_

- Determine any change in enrollment from base year:

Formula:

$$\frac{\text{Current Oct/Year}}{\text{Base Oct/Year}} = \% \text{ Increase or Decrease}$$

- Instead of using meal counts, use the base year counts adjusted for % changes in enrollment:

Breakfast Category	Corresponding Month Base Year Meals	x	Percent Enrollment Change	=	Breakfast Calculated Meal Count**
--------------------	--	---	---------------------------	---	--------------------------------------

Free	_____	x	_____	=	_____
------	-------	---	-------	---	-------

Reduced Price	_____	x	_____	=	_____
---------------	-------	---	-------	---	-------

Paid	_____	x	_____	=	_____
------	-------	---	-------	---	-------

Lunch Category	Corresponding Month Base Year Meals	x	Percent Enrollment Change	=	Lunch Calculated Meal Count**
----------------	--	---	---------------------------	---	----------------------------------

Free	_____	x	_____	=	_____
------	-------	---	-------	---	-------

Reduced Price	_____	x	_____	=	_____
---------------	-------	---	-------	---	-------

Paid	_____	x	_____	=	_____
------	-------	---	-------	---	-------

**Instructions:** Use calculated meal count per category, adjusted for increase/decrease in enrollment (\*\*), for reimbursement claims in non-base years.

Form Completed By (Name) \_\_\_\_\_ Date \_\_\_\_\_

For Schools Participating in Special Assistance Provision 2 and Provision 3

Program:  Breakfast Program  
 (Separate form for each)  Lunch Program

**Revenue by Category**

Source of Revenue	Without Provision 2 or Provision 3			With Provision 2 or Provision 3		
	Paying Student	Free Student	Reduced-Price Student	Paying Student	Free Student	Reduced-Price Student
Cash Payment						
Federal Reimbursement <sup>1</sup>						
Entitlement Commodities <sup>2</sup>						
Totals						

**Average Revenue**

Category of Student	Without Provision 2 or Provision 3			With Provision 2 or Provision 3		
	Average Number Served	Revenue by Category	Total Revenue	Average Number Served	Revenue by Category	Total Revenue
Paying						
Free						
Reduced-Price						
Totals						
Revenue for Year						
Average Revenue per Meal						

Form Completed By (Name) \_\_\_\_\_

Date \_\_\_\_\_

<sup>1</sup>Use current federal reimbursement rates

<sup>2</sup>Use current value of enrollment commodities

**South Carolina**  
**School Food Service Program Reference Manual**  
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# Chapter 11 – Verification of Eligibility

## Overview

Verification is confirmation of eligibility for free and reduced-price meals under the National School Lunch Program and its related initiatives. Verification must include either:

- Confirmation of income eligibility (i.e. confirmation that the application was approved correctly due to the household's income and size);

OR

- Confirmation of categorical eligibility (i.e. confirmation that the application was correctly approved because the student(s) listed is/are eligible for one of the following food assistance programs:
  - Supplemental Nutrition Assistance Program (SNAP);
  - Temporary Assistance to Needy Families (TANF); or
  - Commodity Distribution on Indian Reservations (FDPIR). Note that in South Carolina, the FDPIR is not operated as a separate program. Children living on Indian reservations that are eligible to receive benefits through the FDPIR participate in SNAP and/or TANF. SNAP and TANF benefits are administered by the Department of Social Services (DSS).

Verification efforts are **not** required:

- For children who have been directly certified for SNAP/TANF and Foster benefits (See Chapter 10 – Determining Eligibility in this *Program Reference Manual* for additional information.);
- For children documented as eligible migrants, runaways or homeless;
- For children living in residential child care institutions (RCCIs);
- In schools/School Food Authorities (SFAs) participating **only** in the Special Milk Program (see Chapter 29 – Other Food Service Related Programs) for additional information.); or
- In SFAs in which **all** schools participate in Provisions 1, 2, or 3, except in those years in which applications are taken for all students in attendance (i.e. the base year).

All other SFAs must each year select and verify eligibility of a sample of applications approved for benefits.

## Personnel Required for Verification

Each SFA is required to appoint at least four different people to assist with the verification process. All four of these people must be named in the SFA's Application in SCAPS. (See the Designation of Reviewing, Verifying, Confirming and Hearing Officials page in Chapter 3 – Policy Agreement of this *Program Reference Manual*.)

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The Reviewing Official is responsible for reviewing all applications for free and reduced-price meals and for determining the eligibility of each. See [Chapter 10 – Determining Eligibility](#) in this *Program Reference Manual* for additional information and instructions. The Reviewing Official must be named on the SFA's Application Packet in SCAPS.

The Verifying Official is responsible for coordinating and completing all verification activities as described in this chapter. This includes, but is not limited to, determining the number of applications to verify, notifying households of their selection for verification, following up with households if needed, reviewing the documentation submitted by households, correcting the household's eligibility status if needed, notifying the household and attendance center(s) of any changes in eligibility status, documenting all verification activities and reporting verification results to the South Carolina Department of Education (SCDE). The Verifying Official must be named on the SFA's Application in SCAPS.

The Confirming Official is responsible for reviewing the decisions of the Reviewing Official **only for the applications to be verified** to ensure that the initial determination for eligibility was correct. (For additional information on this process, see section 5 in this chapter entitled, "[Complete Confirmation Reviews of Applications in Sample](#)".) **The Confirming Official and the Reviewing Official cannot be the same individuals.** The Confirming Official must be named on the SFA's Application Packet in SCAPS.

The Hearing Official is responsible for reviewing the documentation submitted by the household if the household does not agree with the decision of the Verifying Official and requests a hearing within the ten-calendar day advance notice period. It is recommended that the Hearing Official hold a position at a higher administrative level than the Reviewing Official. **The Hearing Official and the Reviewing/Verifying Officials cannot be the same individuals.** The Hearing Official must be named on the SFA's Application Packet in SCAPS.

### Steps in the Verification Process

There are nine steps in the verification process.

1. Decide when to begin verification
2. Count applications
3. Select sampling method
4. Select applications in sample
5. Complete confirmation reviews of applications in sample
6. Notify households selected
7. Review income documentation
8. Verify eligibility and notify households of changes in benefits
9. Report verification results to the South Carolina Department of Education (SCDE)

#### 1. Decide When to Begin Verification

The minimum sample size of applications to verify is based on the total number of approved applications on file on October 1. However, the SFA's Verifying Official is not required to wait until October 1 to begin. In fact, SFAs are encouraged to begin as early as possible, especially if it has been difficult to meet the deadline in the past. To begin the verification process earlier,

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estimate how many applications will be on file on October 1. This estimate should be based on the number of applications from previous years. On October 1, a check must be made of the actual number of approved applications on file to determine if enough applications have been selected. If necessary, additional applications must be selected at this time.

The verification process may begin on an application immediately after it has been approved. While the SFA may, and in fact has an obligation to, verify any application “for cause,” regulations do not permit the SFA to verify 100 percent of applications. See “[Verification for Cause](#)” in Section 9, entitled Report Verification Results to the South Carolina Department of Education (SCDE), provided later in this chapter for additional information.

### 2. Count Applications

On October 1, count the approved applications on file. Note that denied applications should not be verified. Students directly certified should not be included in the number of applications counted for verification; nor should these students be counted as verified. Record all counts on the [Verification Collection Report](#), Form FNS-742. For verification purposes, pay special attention to the following numbers:

#### **Number Approved as Free Eligible Based on SNAP/TANF Case Number (Categorically Eligible)**

Count or **start the verification electronic process** as outlined in your point of sale system for the total number of applications with students eligible for free meals that were approved based on a case number (i.e. not those directly certified) for either SNAP or TANF. This is the number of “categorically eligible” applications, free eligible based on income and household size and reduced eligible.

#### **Number Approved as Free Eligible Based on Income/Household Size Submitted on an Application**

Count the total number of applications with students eligible for free meals that were approved based on household size and income. Include foster children if they are not directly certified. This is the number of free “income eligible” applications.

#### **Total Reduced-Price Eligible Reported**

Count the total number of applications with students eligible for reduced-price meals that were approved based on household size and income. Include foster children. This is the number of reduced-price “income eligible” applications.

Note that an application is counted as one application regardless of whether it is a multi-child application or an application for one child? The sample size for verification depends on the number of paper applications, not the number of children represented.

#### **October 1**

**Q-1** *If October 1 falls on a weekend or a day when school is not in session, on what date should the count be taken?*

**A** SFAs should count the applications on the first school day following October 1.

### 3. Select Sampling Method

There are three sampling methods. SFAs which had a non-response rate of 20 percent or greater the previous school year must use the Basic Sampling method.

#### Qualifying for Alternate Sampling Methods

There are two ways an SFA may qualify to use one of the alternate sampling methods.

- SFAs which had a non-response rate of less than 20 percent may choose to use the Basic Sampling Method or either of the alternate methods.
- SFAs with more than 20,000 children approved by application for free or reduced-price meals by October 1 may also use any of the three methods if its non-response rate for the preceding school year was at least ten percent below its non-response rate for the second preceding school year.

#### Verification Non-Response Rate

The non-response rate is the percentage of household applications selected for verification for which verification information was not obtained by the SFA.

An overview of each of the three sampling methods is provided below.

#### Basic Sampling

All SFAs with a non-response rate of 20 percent or greater in the previous school year's Verification Collection Report, Form FNS-742 must use this method. The SFA will verify a minimum of the lesser of three percent or 3,000 of the total number of all applications for the current school year approved by October 1. The sample size is selected from error prone applications.

#### Error Prone Applications

Error prone applications are defined as applications with income within \$100 monthly or \$1200 yearly of the free or reduced-price income guidelines. Income guidelines are updated annually. They are posted in SCAPS as soon as it is released from USDA each year as part of the Policy Agreement process.

#### Alternate One – Random

Qualifying SFAs may choose to use this method. The SFA must verify three percent or 3,000, whichever is less, of all approved applications on file as of October 1. Once the sample size is determined, applications must be selected at random.

### Alternate Two – Focused

Qualifying SFAs may choose to use this method. The SFA must verify a minimum of one percent (.01) or 1,000, whichever is less, of all applications approved on/by October 1 **plus** one-half of a percent (.005) or 500, whichever is less, of applications approved on/by October 1 based on categorical eligibility. Applications are selected randomly from both income eligible and categorically eligible groups but those from the income eligible group must first be chosen from error-prone applications.

### 4. Select Applications in Sample

#### Required Sample Size

The required sample size is based on:

- The total number of approved applications (households whose children are directly certified are excluded from this process) on file on October 1 (or the first following school day) and on
- Whether the SFA employs Basic, Alternate One – Random, or Alternate Two - Focused sampling for selecting the applications to be verified.

#### Basic Sampling

A minimum of one income application must be verified. Both income eligible and categorically eligible applications are used to compute the sample size. However, only income eligible applications are verified. When using Basic Sampling, compute the sample size as follows:

Total number of approved applications (including income eligible applications and categorically eligible applications but not those directly certified) \_\_\_\_\_ x .03 = \_\_\_\_\_ or 3,000 (whichever is less).

Select the applications for the sample from the income eligible group (i.e. do not include any applications that were approved based on categorical eligibility). Include applications from both the free and reduced-price categories.

Select only “error-prone” applications. Error-prone applications are those with reported income within \$100 monthly or \$1,200 yearly of the free or reduced-price income guidelines. If the number of error-prone applications **exceeds** the required sample size, randomly select the sample from the error-prone applications. If the number of error-prone applications **is less than** the required sample size, randomly select the additional applications from the other income eligible applications. The selection method must be equitable and ensure that the same households are not selected each year.

### Rounding Up the Sample Size

Q-2 *If the sample size is 4.2 applications, do I verify 4 or 5 applications?*

A Five. Partial numbers must always be rounded up to the next whole number.

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### Alternate One - Random

A minimum of one application must be verified. When using the Alternate One – Random method, compute the sample size as follows:

Total number of approved applications (including income eligible applications and categorically eligible applications but not those directly certified) \_\_\_\_\_ x .03 = \_\_\_\_\_ or 3,000 (whichever is less).

The random sample should include both income eligible and categorically eligible applications. Selecting only categorically eligible applications is not permitted. Directly certified students must be excluded from the sample. Any method which ensures that all approved applications have an equal chance of being chosen may be used to select applications for verification. Suggested methods are described below.

### **Only SFA's not using a computerized system would follow these procedures**

#### 1. Selection Interval

A selection interval may be used to select the applications for the sample.

- Number all applications.
- Divide the total number of approved applications on file by the number of applications needed for verification.

Example:

450 applications on file x .03 = 13.5 → 14 (the number of applications that must be verified)

450 ÷ 14 = 32.14 → 33 (the selection interval is every 33<sup>rd</sup> application)

- Randomly select an application from the total pool.
- Then beginning with the selected application, choose every 33<sup>rd</sup> application until 14 applications have been selected.

#### 2. Random Numbers from Co-Worker

- Number all applications.
- Request that a co-worker randomly select numbers between one and the total number of approved applications in the pool (for example, 450). If 14 applications need to be verified, ask the co-worker to provide 14 random numbers.
- Verify those applications.

#### 3. Blind Sample

- Place all of the applications in a container or face down on the table.
- Draw the required number of applications.

### Alternate Two – Focused

A minimum of one income eligible application and one categorically eligible application (i.e. eligible based on a reported SNAP/TANF case number) must be verified. When using the Alternate Two – Focused method, compute the sample size as follows:

Total number of approved applications (including income eligible applications and categorically eligible applications but not those directly certified) \_\_\_\_\_ x .01 = \_\_\_\_\_ or 1,000 (whichever is less)

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### PLUS

Total number of categorically eligible applications \_\_\_\_\_ x .005 = \_\_\_\_\_ or 500 (whichever is less).

Separate the applications into two groups: income eligible applications and categorically eligible applications.

#### 1. Sample from Income Eligible Group

One percent or 1,000, whichever is less, of the total approved applications (i.e. both income and categorically eligible), must be selected from the income eligible error-prone group of applications. Error-prone applications are those with reported income within \$100 monthly or \$1,200 yearly of the free or reduced-price income guidelines.

If the number of error-prone applications **exceeds** the required sample size, randomly select the sample from the error-prone applications. If the number of error-prone applications is **less than** the required sample size, randomly select the additional applications from the other income eligible applications.

If the total number of income applications is smaller than the required sample size, verify all income applications. Verify applications from both the free and reduced-price categories. The selection method must be equitable and ensure that the same households are not selected each year.

#### 2. Sample from Categorically Eligible Group

One-half ( $\frac{1}{2}$ ) of a percent or 500, whichever is less, of the applications approved based on categorical eligibility (i.e. a SNAP/TANF case number) must also be verified.

The method used to select these applications must be equitable and ensure that the same households are not selected each year. See methods described for the Alternate One - Random method above for suggested methods.

Example:

If a SFA had a total of 450 applications approved on/by October 1, 100 of which were approved based on categorical eligibility (i.e. they had proof of participation in SNAP or TANF)...

$450 \times .01 = 4.5 \rightarrow 5$  applications to be selected from error-prone income eligible applications

### PLUS

$100 \times .005 = 0.5 \rightarrow 1$  application to be selected from categorically eligible applications

### Source of Applications

Q-3 *Is the verification sample selected by school or from the district as a whole?*

A The SFA/district is required to select and verify a sample of its approved free and reduced-price applications. The sample must be selected from all of the SFA's applications.

### **Allowable Sample Size**

SFAs may verify any application “for cause” but may not verify 100 percent of approved applications. See “[Verification for Cause](#)” in Section 9, entitled Report Verification Results to the South Carolina Department of Education (SCDE), for additional information.

### **Declining to Verify**

Regulations permit SFAs with 20 or more applications to be verified, based on an individual review of the applications selected for verification, to choose not to verify a maximum of five (5) percent of applications in the selected sample. Reasons to decline might include language or communication barriers or the fact that the application was also selected to be verified in the prior year. The Confirming Official should document on the application the reason(s) for not proceeding with verification. Any application that is removed from the verification sample must be replaced with another application. The eligibility determination of the replacement application must be confirmed.

## **5. Complete Confirmation Reviews of Applications in Sample**

**The requirement to complete confirmation reviews will be waived if the SFA uses a “technology-based solution” that demonstrates a high level of accuracy in processing initial eligibility determinations.** All other SFAs are required to complete confirmation reviews of applications in the verification sample.

All SFAs are required to name a Confirming Official on the contract renewal. The Confirming Official named cannot be the same person as the Reviewing Official. In SFAs that do not use a technology-based system, the Confirming Official is responsible for reviewing the applications selected for verification to ensure that the initial eligibility determination made by the Reviewing Official was correct. This review must be conducted after applications are selected for verification but before verification is actually started.

When a change in benefit level results from a confirmation review, the household must be notified. The [Letter to Households about a Change as a Result of a Confirmation Review](#) (Form 11-A) can be used for this purpose. It may also be necessary to remove the application from the verification pool. [Table 11.1 - Summary of Actions Following Completion of Confirmation Reviews](#) provides guidance for each situation.

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**Table 11.1 - Summary of Actions Following Completion of Confirmation Reviews**

Initial Determination	Confirmation Determination	Action Required
Reduced-Price	Paid	<ul style="list-style-type: none"><li>▪ Notify household of change in benefit level.</li><li>▪ Remove application from verification pool and select another application to be verified.</li></ul>
Reduced-Price	Reduced-Price	<ul style="list-style-type: none"><li>▪ Request verification documentation from household.</li></ul>
Reduced-Price	Free	<ul style="list-style-type: none"><li>▪ Notify household of change in benefit level.</li><li>▪ Request verification documentation from household.</li></ul>
Free	Paid	<ul style="list-style-type: none"><li>▪ Notify household of change in benefit level.</li><li>▪ Remove application from verification pool and select another application to be verified.</li></ul>
Free	Reduced-Price	<ul style="list-style-type: none"><li>▪ Notify household of change in benefit level.</li><li>▪ Request verification documentation from household.</li></ul>
Free	Free	<ul style="list-style-type: none"><li>▪ Request verification documentation from household.</li></ul>

### 6. Notify Households Selected

#### Income Households

Households with eligibility based on income must be notified in writing of their selection for verification and of the types of income documentation that are acceptable. SFAs that do not use letters provided by a software program are encouraged to use the following letters and forms which are provided at the end of this chapter:

- Letter to Household about Selection for Verification, (Form 11-B)
- How to Prove Eligibility, (Form 11-C)
- Household Members' Names and Social Security Numbers, (11-D)

Additional forms (Form 11-E, 11-F and 11-G) have been provided and may be made available by the school/SFA for households to use when asking employers, Social Security office personnel and DSS personnel to confirm their income/benefits.

SFAs choosing to modify the Letter to Household about Selection for Verification (Form 11-B) or to write their own must include the following information:

1. Notification that the household has been selected for verification.
2. Explanation that information must be provided by a date as specified by the SFA and that failure to do so will result in termination of benefits.
3. Explanation of the types of acceptable information that may be provided to confirm current income, including any pay stubs, award letters from welfare departments, Social Security, and support payment decrees from courts.

## Chapter 11 – Verification of Eligibility

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4. Explanation that the household may submit documentation of income received for any point in time between the month prior to application and the date documentation of eligibility for verification is due. If this amount is not representative, the household should contact the SFA for assistance in determining acceptable documentation.
5. Instructions that the household must provide the Social Security number for each household member 21 years or older or an indication that a household member does not have one.
6. Instruction that the household may provide proof that the child is a member of a currently certified SNAP/TANF household instead of providing income information and Social Security Numbers of adult household members.
7. A Privacy Act statement.
8. The name and a free telephone number of an SFA official who can answer questions and provide assistance during the verification process. There are several ways to provide a free number.
  - Establish a toll-free number.
  - Allow the household to reverse the charges (i.e. call collect).
  - Provide different telephone numbers for each local calling area served. Note that although all students may live in the local area code, parents may work in other areas and must have a way of calling without being charged for the call.

### Social Security Numbers

Although only **the last four digits** of one adult household member's Social Security number is required at the time that application for meal benefits is made, Social Security Numbers of all adult household members or an indication that the household member does not have one will be required if the application is selected for verification of income eligibility information. Social Security numbers are not required when verifying SNAP/TANF eligibility.

### Categorically Eligible Households

Categorically eligible households are approved for free benefits based on a reported case number for SNAP or TANF. In South Carolina, SNAP and TANF benefits are administered by DSS.

There are two ways in which a SFA may verify the eligibility of categorically eligible households.

- The first option is called direct verification and is when the SFA obtains information directly from DSS to confirm a household's receipt of SNAP and/or TANF benefits. (Note that direct certification of SNAP participants is required. See [Chapter 10 – Determining Eligibility](#) for additional information concerning [Direct Certification for Free Meal Benefits](#).) It is not necessary to notify categorically eligible households that their eligibility is being directly verified.
- The second option is to ask the household to provide proof of their participation in the SNAP and/or TANF program(s). The notification of selection must include a request for the household to submit written evidence of certification to receive SNAP/TANF benefits.

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SFAs without verification software programs should use the following letters and forms which are provided at the end of this chapter, for this purpose:

- Letter to Household about Selection for Verification, (Form 11-B)
- How to Prove Eligibility, (Form 11-C)
- Household Members' Names and Last Four Digits of Social Security Numbers, (11-D)

Additional forms (Form 11-E, 11-F and 11-G) have been provided and may be made available by the school/SFA for households to use when asking employers, Social Security office personnel and DSS personnel to confirm their income/benefits.

### **Complete Verification for All Households Notified**

The SFA must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information. That is, the SFA cannot select five percent of the applications on file and notify those households of their selection with the hopes of getting three percent to respond to fulfill the verification requirement. The SFA must follow up with any household notified of their selection.

## 7. Review Income Documentation

Once households have received their notification of selection for verification, they are to send in documentation that verifies their eligibility. There are three methods of documenting household eligibility.

- Written evidence
- Collateral contacts
- Agency records

Any one or a combination of these methods may be used to complete verification. In most cases, SFAs will obtain written evidence from households selected for verification. This is evidence submitted by the household that documents the household's income or participation in the SNAP/TANF programs. When agency records and/or collateral contacts are used, eligibility documentation is obtained from sources other than the household. SFAs must use the section provided as part of the software program or Verification Worksheet (Form 11-K) to document each household's verification. If desired, the SFA may complete a summary of these individual worksheets for their own records using the Summary of Verification Worksheets (Form 11-L).

### **Written Evidence**

Written evidence is information received directly from the household, such as pay stubs or proof of SNAP/TANF participation. Whenever possible, written evidence should be used as the primary source of information to confirm household eligibility.

#### Request for Written Evidence of Income Eligibility

When providing written evidence of income, households should be asked to submit current documents. However, documents dating back to the month prior to application are also acceptable. Sources of acceptable types of written evidence to be used for income documentation are outlined below in Table 11.2 and on the Letter to Household about Selection for Verification (Form 11-B) provided at the end of this chapter.

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All documents should contain the name of the household member and/or another identifying factor such as Social Security Number, the amount of income received the income frequency, and the date the income was received. A pay stub with no date is not sufficient.

Income to be reported by households is gross earned income, which includes any money received on a recurring basis. Gross income means all money earned before income tax, Social Security, insurance premiums or other deductions are withheld.

### Verification Documentation Dates

Q-4 *Am I to verify eligibility at the time of application or at the time of verification?*

A Verification is intended to establish current eligibility. The SFA should therefore ask the household to provide documentation of income for the most recent full month for which it is available. However, households should be allowed to provide documentation of income for any point in time between the month prior to application and the time the household is required to provide income documentation.

### Foster Child's Application

Q-5 *What kind of written evidence is required for verification of a foster child's application?*

A SFA officials should contact the household in which the foster child resides and ask for the name, agency, and phone number of the social worker assigned to that child. A phone call to the social worker confirming the child's status as a foster child and the amount of money designated by the agency for the child's personal use would be sufficient verification. The SFA should, however, document the phone conversation with the social worker (identifying the social worker, agency, phone number, status of the child, and the child's personal use income). Another approach would be to ask the foster family and the placement agency for a copy of written communication in which the status of the child and the financial arrangement is stated. If the family is unable to provide such information, a phone call to the placement agency to confirm the child's status and income should be made prior to denying the child free meals.

### Overtime Income

Q-6 *How is overtime income counted for verification purposes?*

A The Verifying Official should work with the household to determine whether the overtime for the month being verified is representative of overtime received in other months. If the overtime is a one time or sporadic source of income, income should be calculated based on the regular monthly income

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(without overtime). Looking at “year to date” totals on paycheck stubs may help determine if overtime income is sporadic or regular.

### Weekly Income

**Q-7** *If a household is paid weekly and submits a pay stub for a week, must I go back and ask for pay stubs for a whole month?*

**A** Pay stubs for a whole month are not required. However, two consecutive pay stubs are required. You can then determine if the weekly amount is representative of what the household receives each week and calculate the amount received each month.

### Seasonal Worker

**Q-8** *Is a seasonal worker, such as a teacher’s aid or school cook, eligible for free or reduced-price meal benefits based on income during the summer months when the person was not working?*

**A** A seasonal employee has regular income for most months of the year. To determine “current monthly income,” divide the annual income by 12 months. Although the individual may not have received a check in July or August, zero income should not be reported for these months. Instead, the application should either be approved on a temporary basis or the household should be asked to report its annual income.

### Income from Multiple Sources

**Q-9** *If a household reports income from several sources (i.e. salary, child support and self-employment), must they provide evidence for each source of income?*

**A** Yes. Verification of all income sources is required. In general, anything considered as income for the initial application process is also considered as income for verification purposes, and documentation for such income is required. There should also be documentation of the loss of an income source, such as a lost job.

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**Table 11.2 – Sources of Acceptable Types of Written Evidence**

Type of Source	Description	Acceptable Documentation
Earnings – Wages and Salary	Total gross earnings before the withholding for FICA, taxes, or other deductions such as insurance.	<ol style="list-style-type: none"> <li>1. Current paycheck stub</li> <li>2. Current pay envelope</li> <li>3. Letter from employer stating gross wages paid and how often they are paid</li> </ol>
Earnings of Self-Employed Business Person or Farmer	<p>If the applicant is a self-employed business person or farmer, net income should be used. Note: Many of the assets of self-employed business persons are on paper and their cash or net worth is often very low, although they may hold considerable property and equipment (assets). They should report only their actual cash income, not assets.</p> <p>Households with other forms of income should provide information and/or documents that show the amount of income received how often it is received, and the date received.</p>	<ol style="list-style-type: none"> <li>1. Business or farming documents, such as ledger books and/or self-issued paycheck stub</li> <li>2. Last quarterly tax estimate</li> <li>3. Last year's tax return</li> </ol>
Cash Income	Some persons who work in situations where the employer does not want to be responsible for withholding, such as domestic workers, casual laborers, or persons working for an individual or small business on an irregular basis, may receive wages in the form of cash.	<ol style="list-style-type: none"> <li>1. A letter from the employer stating wages paid and frequency</li> </ol>
Social Security Retirement	This includes the traditional retirement benefit, payments to survivors (spouses and children) and disability payments. Please note that younger persons (pre-retirement) and their dependents can also receive disability payments.	<ol style="list-style-type: none"> <li>1. Social Security retirement benefit letter</li> <li>2. Official statement of benefits received</li> <li>3. Monthly check</li> </ol>
Supplemental Security Income (SSI)	Not a retirement pension, SSI is a special funding program to assist households with aged, blind, or disabled members. Often, if a child has a learning disability, the household will receive a monthly SSI assistance payment. Please note that some applicants will refer to these payments as “disability” and may not understand that it is a form of Social Security payment.	<ol style="list-style-type: none"> <li>1. SSI eligibility letter</li> <li>2. SSI check</li> <li>3. Official statement of benefits received</li> </ol>
Unemployment Compensation/Disability or Workers' Compensation	Unemployed and disabled persons may receive one or more types of income.	<ol style="list-style-type: none"> <li>1. Notice of eligibility from state unemployment office</li> <li>2. Copy of the disability award letter/unemployment compensation award letter</li> <li>3. Check stub</li> <li>4. Agency records</li> </ol>

## Chapter 11 – Verification of Eligibility

**Table 11.2 – Sources of Acceptable Types of Written Evidence** continued

Type of Source	Description	Acceptable Documentation
TANF Program	A welfare payment intended to assist eligible persons to meet the costs of daily living. Most often these payments are made to families with needy children under the age of 18 (21 if in school) where a parent is absent from the home.	<ol style="list-style-type: none"> <li>1. Written letter of certification or notice of eligibility</li> <li>2. Signed, dated letter from DSS office</li> <li>3. Copy of the household's EBT Card and two recent EBT receipts</li> </ol>
Retirement/Pension	This refers to non-Social Security retirement. It includes private pensions, state pensions, veterans, and/or military retirement.	<ol style="list-style-type: none"> <li>1. Official statement of benefits received</li> <li>2. Pension award notice</li> </ol>
Railroad Retirement of R.R. Benefit	This is a special government retirement fund for former employees of the railroads. Payments can be made to survivors (spouses and children).	<ol style="list-style-type: none"> <li>1. Official statement of benefits received</li> <li>2. Railroad retirement award letter</li> </ol>
Veterans Payments	Money paid periodically by the Veterans Administration to disabled members of the armed forces or to survivors of deceased veterans.	<ol style="list-style-type: none"> <li>1. Official statement of benefits received</li> <li>2. Veterans Administration award notice</li> </ol>
Child Support or Alimony	This is a payment by a separated or divorced spouse for the support of children and/or the spouse. Although the court has ordered (decreed) a monthly amount or an amount was agreed upon, payments may be infrequent or irregular. Only actual payments and not the amount that is supposed to be received should be reported.	<ol style="list-style-type: none"> <li>1. Copies of checks or other proof of payments received</li> <li>2. Court decree or agreement</li> </ol>
Military Housing Allowance	This may be received if an adult member of the household is a member of the military and the household is located off-base.	<ol style="list-style-type: none"> <li>1. Leave and earnings statement</li> <li>2. Letter from the base commander stating amount and frequency of allowance</li> </ol>
Rental Income	This is room and board payment by non-household members living in the home.	<ol style="list-style-type: none"> <li>1. Rental agreement or letter from non household members stating amount paid</li> </ol>
Zero Income	On occasion, a household may report no income on the application. This might occur if a person is a live-in housekeeper and receives only room and board as compensation for work done, or if a household is being supported by non-monetary means provided by religious or civic organizations due to illness or disability. A household can be asked to provide a written statement describing the household's circumstances, including how the household pays for food, housing, etc., when no income is reported. An alternative is to use a collateral contact approach to verify the application.	<ol style="list-style-type: none"> <li>1. Written statement from household describing how it subsists</li> <li>2. Collateral contact</li> </ol>

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### Request for Written Evidence of Categorical Eligibility

As explained in the section entitled, “6. Notify Households Selected,” SFAs may verify the eligibility of SNAP/TANF participants either by contacting a DSS office or by asking the household for evidence of participation.

Every time a household is approved for SNAP/TANF benefits, they are furnished with a written letter of certification or notice of eligibility. The Verifying Official should examine this notice of eligibility to ensure that the child for whom the application was made is part of a household currently participating in the SNAP/TANF program.

A SNAP/TANF document that does not specify the certification period is not adequate for documentation. For example, the SNAP identification card or Electronic Benefits Transfer (EBT) card alone is not acceptable because it does not have an expiration date. However, an EBT card submitted along with copies of two EBT receipts dated within a month prior to application and the time the household is required to provide income documentation may be used to prove current participation.

A household that does not have satisfactory categorical documentation may request a signed, dated letter from the County DSS office certifying that the child is part of a household currently receiving benefits. Confirmation of SNAP/TANF Benefits (Form 11-G) may be used by households to obtain this information if made available by the school office.

Verification is complete when the household submits adequate documentation of current participation in the SNAP/TANF program or a notice of adverse action is sent to the household by the SFA.

### Collateral Contact

A collateral contact is a person outside of the household who is knowledgeable about the household’s circumstances and can give confirmation of a household’s income and household size, or its SNAP/TANF status. When the household has been unable to provide adequate written evidence, the household may identify a collateral contact from which the SFA can obtain the requested information either orally or in writing. Collateral contacts include employers, social service agencies, migrant workers’ agencies and religious or civic organizations.

The Verifying Official should request a collateral contact **only** in cases when the household has not been able to provide adequate written evidence. The Verifying Official must give the household the opportunity to designate the collateral contact. However, the Verifying Official may select a collateral contact if the household fails to designate one or designates one that is unacceptable to the Verifying Official. In either case, no contact may be made without first notifying the household and obtaining their permission.

A collateral contact would not be expected to provide the last four digits of the Social Security numbers of the adult household members. These still must be provided by the household. The SFA will examine any written information provided by the collateral contact or evaluate any oral information. Based on this information, a determination should be made.

If the collateral contact is unwilling or unable to provide the requested information, then the household’s benefit is to be terminated for failure to respond.

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All collateral contacts are to be documented, dated, and initialed by the Verifying Official. This documentation must be kept with the household's Verification Worksheet (Form 11-K).

### Agency Records

A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SFA has legal access. Although regulations do not require that the household be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.

The most common example of verification using agency records is using the direct verification process established between SCDE and DSS to confirm a household's participation in SNAP and/or TANF. This can also be accomplished by submitting a list of names and SNAP/TANF case numbers directly to the local DSS office. The following forms have been provided at the end of this chapter for the direct contact and should be used:

- Letter to SNAP/TANF Office from the SFA (Form 11-I)
- Verification of Participation in the SNAP and/or TANF Program (Form 11-J)

The DSS official completing the form will indicate that:

- The child was eligible for SNAP or TANF benefits at anytime from the month of application for free school meals up to the current date. Verification is considered complete.

OR

- The child was **not** eligible for SNAP or TANF benefits at anytime from the month of application for free school meals up to the current date. The SFA must then send the household the Letter to Household about Results of Verification (Form 11-H) provided at the end of this chapter. The household is then considered an "income household" (instead of a categorically eligible household) and the steps for verification of income households will be followed. Refer to the previous section entitled "Income Households."

When using agency records, the SFA should request information for the most recent month available. Households that dispute the validity of information acquired through systems of records must be given the opportunity to send more recent information during the ten-day period of advance notice of adverse action.

When verifying eligibility through a County DSS office, begin as early as possible to allow sufficient time, at least 30 days, for that office to respond to the request. Additional time may also be necessary to acquire other verification information from households if the agency contacted reports that some households are not currently receiving SNAP/TANF benefits.

### Unacceptable Documentation

Income tax forms are not considered acceptable proof of income except for households with irregular income (i.e. farmers, seasonal workers, self-employed persons, etc.). In these cases, tax forms may be used to project the amount of income the household expects to receive for the current year.

Documentation for SNAP/TANF households that does not specify the certification period is not adequate proof of participation. For example, the EBT card alone is not acceptable because it does not have an expiration date.

### Household Moves

**Q-10** *What if an application is selected for verification, but the household then transfers out of the district before the information can be verified?*

**A** Verification is considered complete when a household's eligibility for the level of benefits for which it was approved is either confirmed or a notice of adverse action has been sent. If a child is selected for verification but transfers out of the district before the information can be verified, verification cannot be completed. To meet the minimum verification requirements, a new application must be selected.

### One Follow-up Attempt is Required

If the household does not respond to the request for income information and/or last four digits of the Social Security numbers or written evidence of participation in the SNAP/TANF programs or submits insufficient or obsolete written evidence, **the SFA is required to make at least one additional attempt to obtain the required information. This follow-up may be made through the mail, by telephone, by e-mail, or through personal contact. All attempts and the results must be documented.** If the SFA is unable to verify the household's eligibility status, after the follow-up attempt(s), the SFA may terminate the household's benefits for failure to respond to the request for written evidence. Verification is considered completed when the advance notice of adverse action is sent to the household.

## 8. Verify Eligibility and Notify Households of Changes in Benefits

After notification is sent to households and they have been asked to submit verification of eligibility for free or reduced-price meals, one of the following four outcomes will result:

### No Change in Benefit Level

The household complies with the request and provides information that confirms the eligibility determination previously made. Verification is considered complete. SFAs should inform households by sending the Letter to Households about Results of Verification (Form 11-H) provided at the end of this chapter.

### Decrease in Benefit Level

The household complies with the request by providing information, but the documentation identifies income too high for the level of benefits for which the child was previously approved. Therefore, the household's eligibility must be changed from free to reduced-price, from free to paid, or from reduced-price to the paid category. Verification is considered complete when the household is sent the Letter to Household about Results of Verification (Form 11-H) provided at

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the end of this chapter, and is provided ten-calendar days advance written notice of the change. Benefits must be changed on the specified date.

### **Increase in Benefit Level**

The household complies with the request by providing information, but the documentation provided qualifies the household for free meals rather than reduced-price meals. Therefore, the household's eligibility status must be changed from reduced-price to free. Verification is considered complete when the household is sent the Letter to Household about Results of Verification (Form 11-H) provided at the end of this chapter. Changes in eligibility resulting in increased benefit levels are effective immediately but must be made within three operating days.

### **Termination of Benefits**

Free and reduced-price benefits must be terminated for households:

- Whose current documentation does not support eligibility for either free or reduced-price meals;
- That do not respond to verification efforts after at least one documented follow-up attempt.

If the household does not respond to verification efforts or submits incomplete or obsolete information, the SFA **must** contact the household at least one additional time to request the missing information and notify them that failure to comply will result in termination of benefits. The SFA may contract with a third party to assist with the required follow-up activity. Any third party is subject to the confidentiality requirements outlined in Chapter 5 – Confidentiality & Disclosure of Eligibility, provided in this *Program Reference Manual*.

The follow-up attempt(s) may be made through the mail, by telephone, by e-mail, or through personal contact. The SFA must document on the household's Verification Worksheet (Form 11-K) any and all follow-up attempts and the date(s) of the attempt(s). If the SFA is unable to verify the household's eligibility status after the follow-up attempt(s), the household's benefits must be terminated.

Verification is considered complete when the household is sent the Letter to Household about Results of Verification (Form 11-H) and is provided ten-calendar days advance written notice of the change. Benefits must be changed on the specified date.

### **Change in Eligibility Applies to All Children in Household**

**Q-11** *If verification efforts result in a change in benefit level or termination of benefits does that change extend to all children in the household?*

**A** The change must be extended to all children in the household who were determined eligible by information that no longer supports the benefit level.

### 9. Report Verification Results to SCDE

The SFA must Use the SCAPS system to upload the Verification Collection Report on or before December 1 of each year. The SFA's electronic Verification Collection Report and a copy of the same report in SCAPS must be kept on file by the SFA for three years.

Contact information is Gregg Ferguson at [gferguso@ed.sc.gov](mailto:gferguso@ed.sc.gov), or call 804-734-8204 or by cell at 803-465-1061.

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### Verification Checklist

This list provides a brief overview of the steps required for verification. For detailed instructions, read the complete Chapter 11 – Verification of Eligibility provided in this *Program Reference Manual*.

1. May-June - Designate a Reviewing Official, Verifying Official, Confirming Official and Hearing Official in SCAPS
2. October 1 – Using the SFA's electronic system or manually count all approved applications on file (except those directly certified), select the sampling system and select applications to be verified
3. October 1 – Complete confirmation reviews of applications to be verified (if SFA does not use a technology-based system).
4. Early October – Send Letter to Household about Selection for Verification (Form 11-B), How to Prove Eligibility (Form 11-C) and Household Members' Names and Social Security Numbers (Form 11-D) to households selected for verification. Keep copies or note the date these were sent to each household on the household's Verification Worksheet (Form 11-K).
5. Make at least one documented attempt to obtain the necessary information from any households that fail to respond by the deadline. Attempts may be made by mail, telephone, e-mail or in person. Record the date and method used on the household's Verification Worksheet (Form 11-K).
6. Review documentation provided by the household and determine whether the eligibility of the students in the household should remain the same (as determined on their application) or should be changed. Note your decisions on the household's Verification Worksheet (Form 11-K).
7. Notify each household (including those that failed to respond) of your decisions by sending them the Letter to Household about Results of Verification (Form 11-H).
8. **November 15 – Complete all verification activities.** Complete and sign all Verification Worksheets (Form 11-K). Complete and submit to the South Carolina Department of Education the Verification Collection Report by December 1 each year.
9. If any requests for a hearing are submitted, make sure that the Hearing Official makes a decision and notifies the household using Letter to Household Following Hearing (Form 11-M).
10. December 1, submit results of the verification efforts to SCDE using the SCAPS system.

### Record Keeping Requirements

Verified applications must be readily retrievable by school. The SFA must keep the following documentation on file for three years to demonstrate compliance with verification requirements:

1. Copies of all applications selected for verification.
2. A completed Verification Worksheet (Form 11-K) for each household verified. Note that use of the Summary of Verification Worksheets (Form 11-L) is optional and is for SFA use only.
3. All documents or copies of documents or a record of all documents submitted by the verified households, or by collateral contacts, or by agencies completing direct verification. If a household requests that documentation be returned, the SFA should make a copy and comply with the request. When records rather than originals or copies of the documentation itself are used, the record of the documents submitted by the household must include the type of document (for example, wage stubs or letter from an employer), income shown on the document, time period of the income, and the date of the document.
4. Documentation of all relevant correspondence and contact between the households and the SFA.
5. A completed Verification Collection Report.

### Verification for Cause

An application may be verified “for cause” at any time during the school year as long as:

- The application has been approved and
- The selection of applications does not involve discrimination against anyone on the basis of race, color, national origin, gender, age, or disability.

The SFA has an obligation to verify any application that contains questionable information. However, the SFA may not choose to verify all (i.e. 100% of) approved applications.

Requesting proof of eligibility along with the application is acceptable. However, if an application is complete and indicates that the child is eligible for free and reduced-price meal benefits, the application must be approved. Only after the initial determination of eligibility has been made can the SFA begin the verification process. SFAs verifying for cause must remember to follow all applicable steps outlined in this chapter.

Any verification that is done “for cause” is in addition to the required sample. Only the minimum required number of applications must be verified by the November 15 deadline.

### Notice of Adverse Action

When verification results in a reduction or termination of benefits, households must be sent a written notice prior to the changes in benefits. This notice must give households a ten-calendar

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day notice before benefits are reduced or stopped. The first day of the ten-calendar day period is the day that the notice is sent. The Letter to Household about Results of Verification (Form 11-H) should be used and has been provided at the end of this chapter. As required, this notice includes the following information:

- The change in benefits;
- The reason(s) for the change;
- That, if desired, an appeal must be filed within the ten-calendar day advance notice period to ensure continued benefits while awaiting a hearing and decision;
- The instructions on how to appeal;
- That the household may reapply for benefits at any time during the school year; and
- That SNAP/TANF households may submit an application containing household names and income information and provide written evidence of current household income and the Social Security Numbers of household members over the age of 21.

If the household does not appeal, the benefits must be reduced or terminated on the specified date.

### Benefits During Appeal of Verification Results

Households have the right to a fair hearing concerning the reduction of meal benefits due to verification activities. When a household appeals a reduction or termination of benefits within the ten-calendar day advance notice period, the SFA must continue to provide the benefits for which the child was originally approved until a final determination is made.

### Hearing Procedure

The hearing procedure in the SFA's "Policy Agreement for Free and Reduced Price Meals" (see blank prototype form in Chapter 3 – Policy Agreements in this *Program Reference Manual*) must be followed. The designated Hearing Official must be an individual who is not involved with the approval or verification process. The household may request an SFA conference prior to a formal hearing. Any such conference must not prejudice a later appeal. The decision of the Hearing Official must be based on the income documentation provided by the household and the current income eligibility guidelines. Following the hearing, the household should be notified in writing within five days of the decision using the Letter to Household Following Hearing (Form 11-M).

If the Hearing Official rules that the benefits must be reduced, the actual reduction or termination of benefits must take place no later than ten operating days after the ten-calendar day advance notice period, or ten operating days after the decision by the hearing official, whichever comes first.

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Example:

**Nov. 10<sup>th</sup>** - Household notified of decrease in benefits (i.e. 10-calendar days advance notice period begins)

**Nov. 19<sup>th</sup>** - (10 calendar days later) Household files an appeal

**Nov. 25<sup>th</sup>** - Hearing Official determines that Verifying Official's decision was correct.

**December 3<sup>rd</sup>** – Date on which the decrease in benefits must go into effect (i.e. 10 operating

days after 10-calendar day advance notice period).

November/December						
Sun	Mon	Tue	Wed	Thur	Fri	Sat
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	1	2	3	4
5	6	7	8	9	10	11

### Households that Reapply for Program Benefits

A household that has benefits reduced or terminated for failing to respond to verification efforts may reapply for Child Nutrition Program benefits at any time during the same school year. However, at the time of reapplication they **must** provide either income documentation or proof of participation in the SNAP or TANF program. The SFA must verify the household's eligibility prior to approval.

### Notifying Attendance Centers of Benefit Changes

When verification results in an increase in benefits (i.e. the student changes from the paid to the reduced-price or free category or from the reduced-price to the free meal category), the change must go into effect immediately or within three working days at the latest. When verification results in a decrease in benefits, the change should be made after ten days advance notice has been given to the household. Each attendance center within the SFA must be notified immediately of changes to be made as a result of verification. The Notification to Attendance Center of Change in Eligibility Status (Form 11-N) provided at the end of this chapter, may be used as is or modified if desired. Other methods of notifying attendance centers are also acceptable.

### Reminders

1. The SFA must complete verification of the minimum required sample size by November 15. This includes sending the notice of adverse action to households whose benefits are reduced or terminated.
2. Round all fractions upward when determining the required sample size of applications to be verified.
3. Each household application counts as only one application, regardless of the number of students included on the application.
4. Any application may be verified "for cause" at any time during the school year after it has been approved. Only the minimum number of applications must be verified by the November 15 deadline. Verifying 100% of application is not allowed.

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5. The SFA must complete the verification process for all households that have been notified of their selection for verification and have been asked to submit verification information.
6. If the household does not respond to a request for verification information, the SFA is required to make at least one additional attempt to obtain verification information from the household.
7. If verification results in an increase in benefits (i.e. a child is changed from reduced-price to free meal benefits), this change is effective immediately, but no later than three operating days. If verification results in a decrease in benefits, the household must be given ten-calendar days advance notice of the change. Day one is the day the notice is mailed.
8. SFAs must provide all households selected for verification with a telephone number that may be used at no charge to the household to call to discuss verification questions.

### Verification Forms and Letters

Use the letters and forms provided as part of your software system or at the end of this chapter to ensure that all required information has been included. Keep copies of all correspondence with households on file for three years plus the current year for review or audit. If a software package with letters is used, compare the letters to ensure that all required information is included.

### Review of Verification Efforts by SCDE

During the Administrative Review process, overclaims will be assessed for any verifications left incomplete or for which appropriate benefit changes have not been made on a timely basis.

### Meeting the Verification Deadline

Verification is an annual requirement with the same deadline, November 15, each school year. The deadline is the same whether it falls on a weekday or a weekend.

The minimum sample size of applications to verify is based on the total number of approved applications on the verification count date which is October 1 (or the first following school day). The Verifying Official is not required to wait until the count date to begin. SFAs are encouraged to begin as early as possible. Do not wait for a reminder from SCDE to begin the verification process.

To prevent overlooking the verification count date and deadline, it is best to:

- Mark October 1 (or the first following school day – the application count date) and November 15 (verification completion deadline) on the SFA/school calendar of events or a calendar noting other important dates and deadlines.

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- Ensure that more than one person is aware of the completion deadline and of the verification requirements and/or assign an alternate Verifying Official. This will help to assure timely completion of verification even if one of the assigned staff is unavailable.
- Develop a written verification plan that includes the methods to be used and the time frames by which each step must be accomplished. The basic plan can be used year after year and can be given to new personnel to help them complete the process more easily in their first year of responsibility for verification.
- Allow sufficient time for agencies (for example, DSS) to confirm household eligibility. Thirty days is the minimum an SFA should allow when using agency records in this process. With direct certification, case number verifications should be minimal.

### Verification Extension Requests

If verification is not completed by November 15, a request for an extension of the verification deadline is required. The request must be submitted to SCDE in writing and SCDE will forward the request to the United States Department of Agriculture (USDA) regional office.

#### When to Apply for a Verification Extension

Apply for an extension of the verification deadline as soon as it is determined that verification will not be completed by the November 15 deadline.

#### Criteria for Approval of Extension Requests

Requests for extensions of the verification deadline will be approved only when unforeseen circumstances or circumstances beyond the control of the SFA cause a delay in the verification process. Examples of such circumstances are:

- Natural or other disasters that damage or destroy buildings or records preventing completion of the process;
- Strikes that prevent access to the necessary records by the personnel assigned to complete the verification process; or
- Sudden absence (due to illness, injury, death, resignation, etc.) of the verification official or other persons directly responsible for conducting verification.

These are only examples and all requests will be considered individually on their merit. Please be advised that requests based on the fact that the persons involved forgot about the process, were involved in other work projects, or that the previous verification official resigned or otherwise became unavailable months before the deadline will not be approved.

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### Information to Include in an Extension Request

Include the following information in a written request for an extension on the verification deadline:

- The name, address and telephone number of the SFA;
- The name and title of the Verifying Official;
- The date by which the SFA expects to complete verification;
- A specific description of the reason(s) why the SFA was unable to complete verification by the deadline (The information provided must be specific enough for USDA to determine whether an extension is warranted. Requests that do not provide sufficient information cannot be processed and will be returned to the SFA for more information); and
- The signature of an SFA official.

Requests for extensions should be sent to SCDE as soon as possible for a determination.

## Letter to Household about a Change as a Result of a Confirmation Review

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

<date of notification>

Dear <Parent's or Guardian's Name>:

**This letter is important. You must send the information we need, or contact <contact person> at <phone number> by <due date> or your child(ren) will stop receiving free or reduced-price school meals.** You may call collect.

Federal regulations require that we check Free and Reduced Price School Meals Applications to ensure that only eligible students receive free or reduced-price meals. Your household's application was selected to be verified. As part of the verification process, we determined that your child(ren)'s eligibility status changed from:

- Free to Reduced-Price
- Free to Paid
- Reduced-Price to Free
- Reduced-Price to Paid

If you believe your child(ren) is/are eligible for free or reduced-price meals, you must send or bring proof of eligibility to the school by <date proof of eligibility is due>.

You must send **either**: (1) papers that show you receive Supplemental Nutrition Assistance Program (SNAP) benefits or Temporary Assistance for Needy Families (TANF) benefits or (2) the names and social security numbers of each adult household member on the enclosed sheet **and** papers that show your household's income. You may use documentation of SNAP/TANF or income from the month prior to application through the current month.

The enclosed page, *How to Prove Eligibility*, shows the kinds of information or documents that you may use to prove your household's eligibility. If possible, send copies, not original papers. If you do send originals, they will be sent back to you only if you ask for them.

If you received this request for a homeless, migrant, or runaway child, please contact <school homeless liaison or migrant coordinator> at <phone number for liaison/coordinator> for help. If your child is a foster child, send us official documentation from the agency sponsoring the child.

If you do not send information to prove eligibility for free or reduced-price meal benefits by <date proof of eligibility is due>, your household will be required to pay the full meal price.

Sincerely,

<Verifying Official's Signature>  
<Verifying Official's Name>  
<Verifying Official's Title>

Enclosures:    How to Prove Eligibility  
                  Household Members' Names and Social Security Numbers

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly.** In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the department. To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (866) 632-9992 (voice) or (202) 690-7442 (Fax) or email at [program.intake@usda.gov](mailto:program.intake@usda.gov). USDA is an equal opportunity provider and employer.

## Letter to Household about Selection for Verification

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

<date of notification>

Dear <Parent's or Guardian's Name>:

**This letter is important. You must send the information we need, or contact <contact person> at <phone number> by <date> or your child(ren) will stop receiving free or reduced-price school meals.** You may call collect.

Federal regulations require that we check Free and Reduced Price School Meals Applications to ensure that only eligible students receive free or reduced-price meals. Your household's application has been selected to be verified. You must send or bring proof of eligibility to the school by <date proof of eligibility is due>.

You must send **either**: (1) papers that show you receive Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamp) benefits or Temporary Assistance for Needy Families (TANF) benefits or (2) the names and the last four digits of the social security numbers of each adult household member on the enclosed sheet **and** papers that show your household's income. You may use documentation of SNAP/TANF or income from the month prior to application through the current month.

The enclosed page, *How to Prove Eligibility*, shows the kinds of information or documents that you may use to prove your household's eligibility. If possible, send copies, not original papers. If you do send originals, they will be sent back to you only if you ask for them.

If you received this request for a homeless, migrant, or runaway child, please contact <school homeless liaison or migrant coordinator> at <phone number for liaison/coordinator> for help. If your child is a foster child, send us official documentation from the agency sponsoring the child.

If you do not send information to prove eligibility for free or reduced-price meal benefits by <date proof of eligibility is due>, these meal benefits will be stopped.

Sincerely,

<Verifying Official's Signature>

<Verifying Official's Name>

<Verifying Official's Title>

Enclosures:     How to Prove Eligibility  
                  Household Members' Names and Social Security Numbers

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**Use of Information Statement: This explains how we will use the information you give us.** The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the last four digits of the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy families (TANF) Program or Commodity Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast of programs.

## How to Prove Eligibility

### Part A – For SNAP/TANF Households

1. If you were getting Supplemental Nutrition Assistance Program (SNAP, formerly Food Stamps) or Temporary Assistance for Needy Families (TANF) program benefits for your child(ren) when you applied for free or reduced-price meals, or at any time since then, then you **only** have to provide information which shows your household's participation in the program. No other income information is required. Send us a:
  - a. SNAP or TANF Certification Notice showing the beginning and ending dates of the certification period.
  - b. Letter from the Department of Social Services (DSS) office stating that you receive(d) SNAP or TANF benefits (Note: You may request a fill-in-the-blank form from the school office for DSS to complete.)
  - c. Copy of your Electronic Benefits Transfer (EBT) card along with two (2) receipts of purchases dated anytime from the month of application for free school meals up to the current date.
2. If you are not able to provide these items and want to continue receiving benefits, you must prove your eligibility based on household size and income. See Part B for instructions.

### Part B – For Households Eligible Based on Household Size and Income

If eligibility is not based on participation in SNAP or TANF, then you must...

1. Complete the enclosed *Household Members' Names and Social Security Numbers* form. Write the name(s) of all household members (related or unrelated) and the Social Security number of each household member 21 years of age or older.
2. Submit papers that show your household's income. You may submit papers from the month prior to your application up to the current date. Provide one of the following documents for each type of income received. You may also provide a letter from the income source stating the amount of income received and how often it is received. Fill-in-the-blank letters are available from the school office and may be taken to your employer or Social Security office.

**The information you send us must show:** (1) The name of the person who received the income; (2) the date the income was received; (3) how much was received; and (4) how often the income is/was received. Acceptable documentation of income includes the following:

#### **Jobs:**

- Paycheck stub or pay envelope that shows the gross amount and how often pay is received
- Letter from employer stating gross wages and how often they are paid

#### **Self-Employment/Farm Income/Seasonal:**

- Business financial records, such as ledger books or last year's tax return

#### **Social Security/Pensions/Retirement:**

- Statement of benefits received
- Pension award notice
- Social Security retirement benefit letter
- Check stub

#### **Unemployment Compensation/Disability/Worker's Compensation:**

- Notice of eligibility from State Employment Security office
- Letter from Worker's Compensation
- Bank statements showing direct deposit
- Check stub

#### **Welfare Payments (TANF):**

- Benefit letter from welfare agency

#### **Child Support/Alimony:**

- Court decree, agreement or copies of checks received

#### **Military Housing Privatization Initiative:**

- Letter or rental contract showing that your housing is part of the Military Housing Privatization Initiative

**All Other Income:** If you have other forms of income (such as rental income), provide information or papers that show the amount of income received, how often it is received and the date received.

**No Income:** If you have no income, write a brief note explaining how you provide food, clothing, and housing for your household and when you expect an income.

# Household Members' Names and Social Security Numbers

## Section 1

Write the names and Social Security numbers of all household members (related and unrelated) **21 years of age or older** in the spaces below. If an adult household member does not have a Social Security number, check the box at the end of the row.

Names of Adult Household Members (Print first and last names.)	Last Four of the SSN (See Use of Information Statement below)	No Social Security Number
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>
_____	____ _	<input type="checkbox"/>

## Section 2

Write the names of all household members **under the age of 21**.

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

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**Use of Information Statement:** This explains how we will use the information you give us. The Richard B. Russell National School Lunch Act requires the information on this application. You do not have to give the information, but if you do not, we cannot approve your child for free or reduced price meals. You must include the last four digits of the social security number of the adult household member who signs the application. The social security number is not required when you apply on behalf of a foster child or you list a Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy families (TANF) Program or Commodity Distribution Program on Indian Reservations (FDPIR) case number or other FDPIR identifier for your child or when you indicate that the adult household member signing the application does not have a social security number. We will use your information to determine if your child is eligible for free or reduced price meals, and for administration and enforcement of the lunch and breakfast of programs. We may share your eligibility information with education, health, and nutrition programs to help them evaluate, fund, or determine benefits for their programs, auditors for program reviews, and law enforcement officials to help them look into violations of program rules.

## Confirmation of Earnings

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

### Dear Employer:

Please complete the information below to confirm earnings of your employee named below. This information is requested to verify the eligibility of the children in the household for free or reduced-price school meals.

Thank you.

<Verifying Official's Name>

<Verifying Official's Title>

-----

This statement is to confirm that \_\_\_\_\_  
received \$\_\_\_\_\_ in gross income **before** deductions for taxes, social security insurance, etc.. This amount is paid:

- Weekly     Every two weeks     Twice a month     Monthly  
 Other – Explain: \_\_\_\_\_

Please state the date of the paycheck referenced above: \_\_\_\_\_

\_\_\_\_\_  
Signature of Employer

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title of Employer

\_\_\_\_\_  
Name of Company/Employer

\_\_\_\_\_  
Address

\_\_\_\_\_  
City

\_\_\_\_\_  
State

\_\_\_\_\_  
Zip

\_\_\_\_\_  
Telephone Number

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July 2013 – Office of Nutrition Programs, SCDE

Form 11-E

**Confirmation of Social Security and/or Supplemental Security Income**

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*

Dear Social Security or Supplemental Security Income Official:

Please complete the information below to confirm Social Security and/or Supplemental Security Income (SSI) of the individual named below. This information is requested to verify the eligibility of the children in the household for free or reduced-price school meals.

Thank you.

<Verifying Official's Name>

<Verifying Official's Title>

-----  
This statement is to confirm that \_\_\_\_\_  
received \$\_\_\_\_\_ in Social Security and/or \$ \_\_\_\_\_ in Supplemental  
Security Income for the month of \_\_\_\_\_.

\_\_\_\_\_  
Signature of Official Date

\_\_\_\_\_  
Title of Official Agency

\_\_\_\_\_  
Address City State Zip

\_\_\_\_\_  
Telephone Number

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## Letter to Household about Results of Verification

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

<Date>

Dear <Parent's or Guardian's Name>:

We checked the information you sent us to prove that <names of child(ren)> is/are eligible for free or reduced-price meals and have decided that:

- The eligibility of your child(ren) for school meals has not changed.
- Starting <date of change>, your child(ren)'s eligibility for meals will be changed from **reduced-price to free** because your income is within the free meal eligibility limits. Your student(s) will receive meals at no cost.
- Starting <date of change>, your child(ren)'s eligibility for meals will be changed from **free to reduced-price** because your income is over the limit. Reduced-price meals cost <rp lunch cost> for lunch and <rp bfast cost> for breakfast.
- Starting <date of change>, your child(ren) is/are **no longer eligible** for free or reduced-price meals for the following reason(s):
  - Records show that you are not receiving SNAP or TANF benefits now and did not at the time of application.
  - Records show that the child(ren) is/are not homeless, runaway, or migrant.
  - Your income is over the limit for free or reduced-price meals.
  - You did not provide: \_\_\_\_\_
  - You did not respond to our request.

Meals cost <paid lunch cost> for lunch and <paid bfast cost> for breakfast. If your household income goes down or your household size goes up, you may apply again. If you did not provide proof of current eligibility, you will be asked to do so if you reapply.

If you disagree with this decision, you may discuss it with <contact person> at <phone number>. You may call collect. You also have the right to a fair hearing. If you request a hearing by <adverse action date>, your child(ren) will continue to receive free or reduced-price meals until the decision of the Hearing Official is made. You may request a hearing by calling or writing to: <Hearing Official>, <HO address>, <HO phone>.

Sincerely,

<Verifying Official's Signature>  
<Verifying Official's Name>  
<Verifying Official's Title>

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July 2013 – Office of Nutrition Programs, SCDE

Form 11-H

## Letter to the SNAP/TANF Office from the SFA

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

< Date >

Dear Department of Social Services Official:

Eligibility for the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), or Commodity Distribution Program on Indian Reservations (FDPIR) automatically qualifies children to receive free schools meals. Enclosed is a form listing households that reported a SNAP or TANF case number on their applications for school meals. These households have been selected to have their eligibility verified.

To ensure that only eligible children receive free school meals, regulations for the SNAP, TANF and FDPIR permit officials of these programs to release eligibility information to administrators of the National School Lunch Program and/or School Breakfast Program.

For each child listed on the enclosed form, please indicate if the child was eligible for benefits anytime from the month of the application for free school meals up to the current date. This information will be used only to confirm the child's eligibility for free school meals.

Your prompt return of the enclosed form will be appreciated. A self-addressed return envelope is enclosed for your convenience. If you have any questions or need additional information, please contact <Verifying Official's Name> at <VO phone number> or <contact person> at <contact phone number>.

Sincerely,

<Verifying Official's Signature>

<Verifying Official's Name>

<Verifying Official's Title>

Enclosures      Verification of Participation in the SNAP and/or TANF Programs

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. This explains what to do if you believe you have been treated unfairly.** In accordance with federal law and U.S. Department of Agriculture policy, this institution is prohibited from discriminating on the basis of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the department . To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (866) 632-9992 (voice) or (202) 690-7442 (Fax) or email at [program.intake@usda.gov](mailto:program.intake@usda.gov). USDA is an equal opportunity provider and employer.



## Verification Worksheet

**Directions:** Attach this form to each application selected for verification with a copy of all correspondence with the household regarding verification and a copy of all documents received.

**Head of Household's Name (last, first):** \_\_\_\_\_

**Students' Names:**

1. _____	4. _____
2. _____	5. _____
3. _____	6. _____

**Date Verification Notice Sent:** \_\_\_\_\_  
**Date Response Due from Household:** \_\_\_\_\_  
**Date and Method of Required Follow-up (or N/A):** \_\_\_\_\_

**Original Approval Was:**

- Reduced-price
- Free based on SNAP/TANF case number
- Free based on income/household size

**SNAP/TANF Benefits Verified:**  Yes  No **OR Social Security Numbers Received:**  Yes  No

**Total Verified Income**

- (a) Gross pay includes routinely earned overtime, holiday pay, vacation pay, shift differentials, etc.
- (b) Do NOT annualize income if it is ALL received with the SAME frequency. Otherwise, convert to annual income using the following factors: Weekly x 52; Every 2 weeks x 26; Twice a month x 24; Monthly x 12.

(1)	Source of Employment/ Income (2)	Gross Pay from Income Documentation <sup>(a)</sup> (3)	Gross Pay from 2 <sup>nd</sup> Consecutive Pay Stub <sup>(a)</sup> (4)	Average Gross Pay (5)	Income Frequency (Circle One) (6)	Conversion Factor <sup>(b)</sup> (If needed) (7)	Verified Income (8)
1					W E2 2M M Y	X =	
2					W E2 2M M Y	X =	
3					W E2 2M M Y	X =	
4					W E2 2M M Y	X =	
5					W E2 2M M Y	X =	
6					W E2 2M M Y	X =	
<b>Total Verified Income</b>							
Check ONE Income Frequency: <input type="checkbox"/> W = Weekly <input type="checkbox"/> E2 = Every 2 Weeks <input type="checkbox"/> 2M = Twice a Month <input type="checkbox"/> M = Monthly <input type="checkbox"/> Y = Yearly							

**Total Verified Number Living in Household:** \_\_\_\_\_

<p><b>Results of Verification:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> No change</li> <li><input type="checkbox"/> Free to reduced-price</li> <li><input type="checkbox"/> Free to paid</li> <li><input type="checkbox"/> Reduced-price to free</li> <li><input type="checkbox"/> Reduced-price to paid</li> </ul>	<p><b>Reason for Change:</b></p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Income: _____</li> <li><input type="checkbox"/> Household size: _____</li> <li><input type="checkbox"/> Change in SNAP/TANF _____</li> <li><input type="checkbox"/> Did not respond</li> <li><input type="checkbox"/> Other: _____</li> </ul>
--	--

**Date Verification Results/Changes Sent to Household:** \_\_\_\_\_  
**Date Change Made:** \_\_\_\_\_  
**Date Hearing Requested (if applicable):** \_\_\_\_\_  
**Hearing Decision and Date Made (if applicable):** \_\_\_\_\_  
**Date Verification of this Application Completed:** \_\_\_\_\_  
**Date and Results of Reapplication (if applicable):** \_\_\_\_\_  
**Verifying Official's Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

## Instructions for Completing Verification Worksheet

1. **Head of Household's Name:** Record the name of the person who signed the application.
2. **Students' Names:** Record the first and last names of all enrolled students on the application.
3. **Date Verification Notice Sent:** Record the date that the household was notified of its selection for verification. Use Form 11-B Letter to Household about Selection for Verification or a very similar letter for this.
4. **Date Response Due from Household:** Record the date by which households were asked to return proof of eligibility. A date two weeks from the date the letter was sent is generally recommended.
5. **Date and Method of Required Follow-up (or N/A):** If the household fails to respond to verification efforts, the school/SFA must follow-up at least once. Record the date of the contact and the method used (i.e. phone, mail, etc.). If follow-up was not needed, record N/A.
6. **Original Approval Was:** Indicate whether the household's original determination was (1) reduced-price, (2) free based on a SNAP/TANF case number, or (3) free based on income/household size.
7. **SNAP/TANF Benefits Verified or Social Security Numbers Received:** Indicate yes or no to the appropriate question (i.e. either SNAP/TANF benefits for categorically eligible households or social security numbers for income eligible households).

For SNAP/TANF households, contact the local DSS office to obtain documentation that the students listed were eligible for SNAP or TANF benefits at anytime from the month of application for free school meals up to the current date.

Use Form 11-I Letter to the SNAP/TANF Office from the SFA and Form 11-J Verification of Participation in the SNAP and/or TANF Programs when requesting information from the local DSS office. Attach a copy of the form returned by DSS confirming participation. If DSS notifies you that a household did not receive SNAP or TANF benefits at any time from the month of application until the current date, give the household the opportunity to supply income information and Social Security Numbers by sending them Form 11-B Letter to Household about Selection for Verification.

If the household, rather than the DSS office, is asked to verify receipt of SNAP or TANF benefits, attach documentation to the household's Verification Worksheet (Form 11-K).

For income eligible households, check Form 11-D – Household Members' Names and Social Security Numbers to ensure that all household members have been listed and that Social Security numbers are provided for each adult household member. If not, obtain the required Social Security number or an indication that the adult household member does not have a Social Security number. If this information cannot be obtained, benefits must be terminated for failure to comply with verification requirements.

8. **Total Verified Income:** Households must provide proof of income for any point in time between the month prior to application and the time the household is required to provide income documentation. Income from all sources listed on the application must be verified.
  - Column 2 – Record the source or type of income (e.g. farm, self-employment, job #1, child support, etc.)
  - Column 3 – Record the current gross income from each income source. This could be documented by a paycheck stub, letter from the employer, court record or canceled check, income tax form (only for self-employment income, farm income or seasonal income).
  - Column 4 – If paycheck stubs are used as documentation for regular wages and salary income, two consecutive paycheck stubs must be provided. Record the current gross income from a second paycheck stub, if applicable.
  - Column 5 – For households providing two consecutive paycheck stubs, determine the average gross pay by adding the gross income in Column 3 and Column 4. Divide this total by 2 and record the answer in Column 5.  
For households that use an income tax form to verify self-employment income, farm income or seasonal income, use Form 1040 and add together lines 12, 13, 14, 17 and 18. It is not

possible to report a negative income from any business venture. The least income possible is zero (no income).

If a household has multiple businesses, it may be necessary to seek clarification from the household to determine which figures reported on lines 12, 13, 14, 17 and 18 apply to each individual business' income.

- Column 6 – Record the frequency of pay period for each income source. This can be obtained from the letter from the employer, paycheck stubs or court record. If paycheck stubs are used as documentation for regular wages and salary income, two consecutive paycheck stubs should be provided. Determine if the pay period is weekly, every two weeks, twice a month, or monthly. If income tax records are provided for self-employment, farm or seasonal income, the pay period is annual.
  - Column 7 – Record the conversion factor, if applicable. If income from ALL sources is received with the same frequency, leave this column blank. Otherwise, record the appropriate annual conversion factor for each income source: Weekly = 52; Every 2 weeks = 26; Twice a month = 24; Monthly = 12.
  - Column 8 – Record the verified gross income from each pay source.
  - Total the amounts in column 8 and check the appropriate income frequency for the household.
9. **Total Verified Number Living in Household:** Count the total number of household members listed on Form 11-D Household Members' Names and Social Security Numbers. Ensure that all household members listed on the application are also listed on Form 11-D Household Members' Names and Social Security Numbers and request clarification of any differences between the two forms. Record the total.
  10. **Results of Verification:** Compare the Total Verified Income and the Total Verified Living in Household to the Income Eligibility Guidelines. Determine if the household's current approved benefits category is still correct or if changes will be necessary. Check the appropriate box on the form to indicate that the benefits remain the same or how they will change.
  11. **Reason for Change:** Indicate the reason for the change (if applicable) in benefit status.
  12. **Date Verification Results/Changes Sent to Household:** Record the date the notification letter was sent to this household. Use Form 11-H Letter to Household about Results of Verification for this.
  13. **Date Change Made:** Record the date that benefits are required to change. A reduction of benefits must be made after ten calendar days advance notice. An increase in benefits must be made within three working days. Remember to promptly notify all necessary staff of the benefit change. Form 11-N Notification to Attendance Center of Change in Eligibility Status may be used for this purpose.
  14. **Date Hearing Requested (if applicable):** Record the date that the request was received from the household for a hearing, if applicable.
  15. **Hearing Decision and Date Made (if applicable):** Record the Hearing Official's decision and the date it was made, if applicable.
  16. **Date Verification of this Application Completed:** Record the date that verification was completed for this application.
  17. **Date and Results of Reapplication (if applicable):** Record the date on which the household reapplies for benefits (if applicable) and the results of their new application (e.g. free based on SNAP/TANF or denied based on income/household size).
  18. **Verifying Official's Signature:** The form should be signed by the Verifying Official.
  19. **Date:** Record today's date.

## Summary of Verification Worksheets

School Food Authority: \_\_\_\_\_

School Year: \_\_\_\_\_ - \_\_\_\_\_

Page \_\_\_\_\_ of \_\_\_\_\_

App. No. (1)	Head of Household's Last Name, First Name (2)	Number of Students on App. (3)	Original Benefits <i>(Check One)</i> (4)			Verification Results <i>(Check One)</i> (5)					Date Verification Completed (6)	Check if Verified "For Cause" <i>See form instructions</i> (7)	
			Reduced Price (4a)	Free		No Change (5a)	Changed to Paid (5b)	Changed to Reduced (5c)	Changed to Free (5d)	Removed from Ver. Sample (5e)			
				Categ. Eligible (4b)	Income Eligible (4c)								
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
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			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
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## Instructions for Completing Summary of Verification Worksheets

Use of this form is optional but may be helpful. Record the name of the School Food Authority (school district) and the school year in the spaces provided at the top of the form. Indicate the page number(s) as applicable (for example, Page 1 of 2 if a total of two pages are needed to complete the Verification Summary Report). Complete one row in the table for each application/household chosen for verification.

Column (1).....Count the verified applications and number them sequentially (for example 1 through 10 if 10 was verified). Record the application's sequential number.

Column (2).....Record the name (last and then first) of the head of household.

Column (3).....Record the number of students listed on the application.

Column (4a)... Check (√) if the household was originally approved for reduced-price benefits.

Column (4b)... Check (√) if the household was originally approved as categorically eligible for free benefits. Categorically eligible is based on a SNAP (formerly Food Stamps) or TANF case number.

Column (4c)... Check (√) if the household was originally approved as income eligible for free benefits. Income eligibility is based upon household size and income.

Column (5a)... Check (√) if verification resulted in no change in benefits.

Column (5b)... Check (√) if verification resulted in decreasing benefits from reduced price or free to paid.

Column (5c)... Check (√) if verification resulted in decreasing benefits from free to reduced-price.

Column (5d)... Check (√) if verification resulted in increasing benefits from reduced price to free.

Column (5e)... Check (√) if verification could not be completed for any reason (for example, the family moved out of the district, communication difficulties, etc.). Remember that only a maximum of five percent of the applications in the sample may be replaced for these reasons.

Column (6).....Enter the date on which verification for this household was completed (i.e. the date on which the notice of adverse action was mailed or SNAP/TANF benefits were directly verified with DSS).

Column (7).....Check (√) if the application was verified because there was cause to think it was incorrect or incomplete. An application verified "for cause" is in addition to those in the required verification sample.

## Letter to Household Following Hearing

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

<Date>

Dear <Parent's or Guardian's Name>:

A decision has been made concerning the eligibility of your child(ren) for Child Nutrition Program benefits. Based on the U.S. Department of Agriculture eligibility guidelines and the documentation provided during the hearing, effective <date of change after hearing> the eligibility of your child(ren) for Child Nutrition Program benefits is as follows:

- Eligibility will not change. Your child(ren) will continue to receive:
- Free school meals.
  - Reduced-price school meals.
- Eligibility will change from free to reduced-price. The reduced-price charge is:  
\$<rp lunch cost> for lunch and \$<rp bfast cost>for breakfast.
- Eligibility will change from reduced-price or free to paid. The paid charge is:  
\$<paid lunch cost> for lunch and \$<paid bfast cost> for breakfast.

The reason for the above change, if applicable, is:

- Household income is over the allowable amount.
- Household is not receiving SNAP/TANF benefits.

If you are not eligible for benefits now, but have a decrease in household income, become unemployed, have an increase in household size or are approved to receive SNAP or TANF, you may fill out an application at that time and reapply for benefits.

Sincerely,

<Hearing Official's Signature>

<Hearing Official's Name>

<Hearing Official's Title>

### **Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly. This explains what to do if you believe you have been treated unfairly.**

"In accordance with federal law and U.S. Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, age, disability, sex, gender identity, religion, reprisal and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the department . To file a complaint of discrimination, write USDA, Director, Office of Adjudication, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410 or call (866) 632-9992 (voice) or (202) 690-7442 (Fax) or email at [program.intake@usda.gov](mailto:program.intake@usda.gov). USDA is an equal opportunity provider and employer.

## Notification to Attendance Center of Change in Eligibility Status

Delete this text and title. Print on SFA letterhead or insert name, address and telephone number of school/SFA.

Date: <Date>  
To: <Attendance Center Official>  
From: <Verifying Official's Name>  
Subject: Change in Eligibility Status

The application for the household below requires an eligibility status change. Please update your roster, ticket or automated meal counting device to reflect each student's new eligibility status, effective on the date of eligibility status change. Please sign and return this form to: < Verifying Official's Name >, < Verifying Official's Title > at <Verifying Official's Return Info>.

Parent or Guardian's Name: < Parent's or Guardian's Name >

Student's Names:

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

Original Eligibility Status:  Reduced Price  Free

Revised Eligibility Status:  Paid  Reduced Price  Free

Date Notification of Change Sent to Household: < date of notification >

Date of Eligibility Status Change: < date of change >

A benefit decrease must be made after ten (10) days advance notice.

A benefit increase must be made within three (3) working days.

Signature of attendance center official confirming that eligibility status changes were made:

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Heather Snelgrove  
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# Chapter 12 - Counting & Claiming

## Responsibilities

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, school personnel must accurately count, record and claim the number of meals actually served to students by eligibility category (i.e. free, reduced-price and paid). The South Carolina Department of Education (SCDE), the School Food Authority (SFA), and the serving site share responsibility for meeting the U.S. Department of Agriculture (USDA) requirements for counting meals.

### SCDE's Responsibilities

1. Review reimbursement claims to identify and correct claims reporting an excessive number of meals served to eligible students.
2. Assess an overclaim whenever accountability deficiencies are known to have resulted in over-payments to schools.
3. Annually review and approve collection and accountability procedures submitted by SFAs.

### SFA's Responsibilities

1. Designate an Authorized Representative to be responsible for ensuring accuracy of meal counts.
2. Annually submit to SCDE the collection and accountability procedures for each site (see Chapter 3 – Policy Agreement, Appendix F in this *Program Reference Manual*). Before changing its approved procedures, the SFA must receive approval from SCDE for the revisions.
3. Each day, count and record the number of reimbursable meals served to eligible students by meal category (i.e. free, reduced-price and paid). This may be done using the forms provided at the end of this chapter or other forms of the SFA's choice (either paper or electronic forms).
4. Daily, weekly, or monthly, compare each serving site's daily record of meals served against data that will assist in identifying excess numbers of meals claimed. See the section entitled, "Edit Checks" in this chapter for additional information and instructions.
5. Following each calendar month that reimbursable meals, snacks and milk are served, submit to SCDE a claim for each serving site. Claims are submitted using SCDE's South Carolina Automated and Payment System (SCAPS).

By February 1 of each year, SFAs with more than one serving site must conduct on-site reviews to verify proper implementation of the approved meal accountability and claiming procedures. Use the On-Site SFA Review of Meal Counting and Claiming Procedures (Form 12-A) to document the on-site review findings. When the on-site review discloses problems with a school's meal counting and claiming procedures, corrective action plans must be developed and follow-up visits must be conducted within 45 calendar days of the initial review. *Program Reference Manual* for additional information and instructions. The Reviewing Official must be named on the SFA's Application Packet in SCAPS

## Serving Site's Responsibilities

Establish a point-of-service meal accountability procedure that assures accuracy of daily meal counts by eligibility category (i.e. free, reduced-price and paid). Use Evaluating Your Accountability System (Form 12-B) to determine if your system is adequate or if it needs improvement.

### 1. Count Meals at the Point-of-Service

Regulations define point-of-service meal count as that point in the food service operation when a determination can accurately be made that a reimbursable free, reduced-price or paid meal has been served to an eligible child. Acceptable point-of-service counting and claiming procedures are required to determine the number of reimbursable meals served. Unless an alternative method is approved by SCDE, the cashier must be located at the end of the serving line to monitor the meals selected to ensure that each meal claimed for reimbursement meets program requirements. In addition, the procedures must provide a method for removing any meal that is not reimbursable from the proper eligibility category of the count. Any alternative accountability procedure must be approved by SCDE annually.

### Point-of-Service Counting Methods

*The following counting methods are **not** point-of-service for meals served in a cafeteria and are **not** acceptable:*

- Counts taken in the classroom;
- Counts based on attendance rosters;
- Counts based on the number of tickets sold/issued;
- Counts based on subtracting one count from another count;
- Head counts; and
- Tray counts.

### 2. Correctly Identify Reimbursable Meals

USDA mandates a Food-Based Menu Planning system. This system requires minimum portion sizes of five food components to be offered at lunch and four food components to be offered at breakfast. Each cashier or monitor must be capable of correctly identifying students' food selections that comprise reimbursable meals..

### Important!

A reimbursable meal must offer all required food components or menu items **before** the point-of-service meal count is taken.

In a Food-Based Menu Planning System, a reimbursable lunch consists of a minimum of three components in which one component **must** be a fruit or a vegetable. A reimbursable breakfast consists of a minimum of four food *items* if participating in "Offer versus Serve" (OVS) or 3 *components* for non-OVS. The student must select the required number of food items in accordance with the SFA's policy regarding "Offer versus Serve." (See Chapter 19 –Menu Planning Basics for additional information.)

### 3. Provide Equal Access for All Students

When a school offers a selection of more than one type of meal that is claimed for reimbursement or a variety of foods and fluid milk to provide choice within the meal, it must offer the same selection to all students regardless of whether the students are eligible for free, reduced-price, or pay the full price for meals set by the school. If certain items are not made available to all students, including those receiving free and reduced-price meals, those items may **not** be counted toward reimbursable meals.

Meals served on a cash-only line may never be claimed for reimbursement, even if the same items are offered on another serving line. A cash-only line does not prevent overt identification. If certain lines are not available to all students, including those eligible for free and reduced-price meals, meals served on those lines may **not** be claimed. Therefore, when planning for special functions, parties, field trips, etc., the Child Nutrition Program (CNP) department should be involved in the process to ensure that students are not overtly identified or denied meals and that the meals claimed for reimbursement meet requirements.

### 4. Protect Identity of Students' Eligibility Category

Common serving areas, dining areas and serving times are to be used for all students during meal service. Use the same procedures for free, reduced-price and paid meals to prevent overt identification of students' eligibility categories when distributing or collecting the medium of exchange (see section entitled "Medium of Exchange" below).

Students eligible for reduced-price meals should be encouraged to purchase a meal ticket in advance because reduced-price eligible students may be overtly identified when cash is taken at the serving line.

#### **Medium of Exchange**

The medium of exchange may be any type of ticket, token, meal card, ID card, cash, name or personal identification number that is issued to the students for obtaining a meal. SFAs must have a way to update daily a student's eligibility category (i.e. noting transfers, withdrawals, and changes in status due to temporary approval, verification, etc.). The meal count/collection procedures selected must ensure that the medium of exchange prevents overt identification of free and reduced-price meal recipients in the coding, distribution and collection process.

#### **Distribution of Medium of Exchange**

All meal counting and collection procedures must include a method for prepayment and/or charging. Charging is seldom recommended. The provision allowing for prepayment and/or post billing/charging should make free and reduced-price meal recipients appear as students who have prepaid full price.

The option of prepayment and/or post billing of meals should be routinely publicized. This may be done by using methods such as posting signs, making public announcements, including the information in printed material, etc. Some SFAs offer incentives for prepayment to limit cash being presented on the serving line.

When distributing the medium of exchange, use a common location and time where all students (free, prepaid reduced-priced and prepaid full-price) are required to obtain their tickets, tokens, etc. To prevent overt identification of eligibility category, allow adequate time and locations to purchase or pick up the medium of exchange.

### **Daily Records of Meals, Snacks and Special Milk Served**

The numbers of reimbursable meals served daily, by category, to eligible students must be recorded and reported by CNP personnel to the SFA. Daily record forms must be completed for each site where meals are served. When more than one full price meal charge is used for a serving site, it is recommended that a separate daily meal record be used for each meal price. For example, if a school serves students in kindergarten through grade 12, elementary students are usually charged one price and secondary students a higher price. In this situation, two daily meal records should be completed: one for the elementary school meals served and one for the secondary school meals served.

### **Daily Records for Pricing Programs**

The forms listed below are provided at the end of this chapter of the *Program Reference Manual* and may be used by pricing programs (i.e. those that distribute applications for free and reduced-price meal benefits) if desired to record the daily number of meals, snacks and special milk units served. Alternate forms may be used if preferred.

- Daily Record of Lunches Served (Form 12-C)
- Daily Record of Breakfasts Served (Form 12-D)
- Daily Record of Afterschool Snacks Served (Form 12-E)
- Daily Record of Milk Served and Income Received (Form 12-F) for sites participating only in the Special Milk Program
- Daily Record of Special Milk Served (Form 12-G) for sites that serve breakfast and/or lunch and also provide Special Milk to pre-K and kindergarten students

Any SFA choosing to use an alternate record form must ensure that correct counts by category are reported in a way that can be easily read, edited and consolidated into an accurate monthly claim for reimbursement. Any report format used must provide a complete record of the day's meal service so that the required information can be transferred to the SFA's report.

### **Daily Records for Non-Pricing Programs**

The following forms must be used by non-pricing programs (i.e. programs that do not distribute applications for CNP benefits and that claim all students or residents in the "free" or "paid" category):

- Participation Roster for USDA Meal Reimbursement – RCCIs (Form 12-H)

Serving site personnel are responsible for recording and reporting the information to the SFA. Note that the above forms are available in Microsoft Excel. Use of the Excel forms is recommended to minimize the potential for math errors.

### **Claim for Reimbursement**

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.

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.

### **Edit Checks**

Edit checks are a self-audit mechanism that allows SFAs to catch math errors, number transpositions, or counts recorded in the wrong column. Before submitting the monthly reimbursement claim, the SFA is required to compare each school's daily counts of free, reduced-price, and paid meals to data that will assist in the identification and correction of errors.

Before performing edit checks, become familiar with the following:

- ADA – Average daily attendance (number)
- ADP – Average daily participation (%)
- Attendance factor – to obtain, divide the ADA by the total enrollment. This can be done on a school level, SFA level or the State Factor may be used by the SFA.
- Daily number of meals served by category
- Number of students approved for free meals
- Number of students approved for reduced-price meals
- Any other enrollment or membership data useful in identifying discrepancies, such as:
  - Maximum allowable free meals equal to the number of approved free multiplied by the number of operating days, and
  - Maximum allowable reduced-price meals equal to the number of approved reduced multiplied by the number of operating days.

The edit checks can be performed on a daily basis on the Daily Record of Lunches Served (Form 12-C) or on a daily, weekly or monthly basis on a similar, locally developed form using the instructions below:

**Step 1:** Compare the daily number of free and reduced-price lunches claimed against the number of students currently approved for free and reduced-price meals. The number of meals claimed must be equal to or smaller than the number of students approved in each category.

**Step 2:** Compare the daily number of free, reduced-price and paid lunches claimed against the attendance factor multiplied by the number of students eligible in each category (i.e. the projected maximum number of lunches that may be claimed in each category).

The random sample should include both income eligible and categorically eligible applications. Selecting only categorically eligible applications is not permitted. Directly certified students must be excluded from the sample. Any method which ensures that all approved applications have an equal chance of being chosen may be used to select applications for verification. Suggested methods are described below.

### **Attendance Factor**

The attendance factor is the percentage of enrolled students in attendance on an average day. It is computed by dividing the average attendance by the total enrollment.

If actual meal counts exceed the projected maximum number of lunches for that eligibility category, the counts should be re-checked to assure no errors were made. If no errors were

made, the reason for the high counts must be recorded (for example, meals were claimed for visiting students). At **no** time may more meals be claimed by category than there are students eligible. If claims are in excess of the number of approved free, reduced-price, paid, or total number of enrolled students without a reasonable explanation, the SFA will be required to repay any over-claims.

The personnel performing the edit checks should be aware of other indications of possible problems including but not limited to the following:

- Patterns of numbers, repetition of numbers or constant counts by category;
- Identical counts for breakfast and lunch;
- 100 percent participation (or a percent greater than attendance factor); and
- Category count exceeding number of students eligible for free and reduced-price meals.

When discrepancies are found or potential problems are suspected, they should be resolved through further investigation. Any findings should be documented (with attendance records, etc.) and kept with the school's daily record of meals claimed. Edit checks must be a daily comparison for each participating school, but it may be completed on a daily, weekly or monthly basis by the school or SFA.

Proper implementation of the meal accountability regulations, which include edit checks and on-site reviews, will ensure an accurate system and prevent over-claims.

### **Accountability System Selection Criteria**

The accountability system is an integral part of the CNP. It determines the procedures for collecting payment and counting meals. Many factors should be considered when choosing a manual or automated system. The system chosen will depend on the size of the serving site, the number of meals served, the number of students participating in the program, the percentage of students receiving free and reduced-price meal benefits, the grade levels involved (elementary or high school), the cost of implementing and maintaining collection procedures, and the staff resources required to operate the system during the meal service and to complete counts and reports.

One percent or 1,000, whichever is less, of the total approved applications (i.e. both income and categorically eligible), must be selected from the income eligible error-prone group of applications. Error-prone applications are those with reported income within \$100 monthly or \$1,200 yearly of the free or reduced-price income guidelines.

#### **The meal accountability system must:**

- Provide accurate point-of-service meal counts by eligibility category, and
- Prevent overt identification of each student's eligibility category.

Whichever system is chosen, it must provide an accurate **point-of-service** count:

- Of reimbursable meals served (one breakfast, one lunch and one snack per eligible student per day),
- By eligibility category (free, reduced-price and paid),
- By day, and
- Without overtly identifying students' eligibility categories.

## Commonly Used Systems

### Rosters

When using a roster, all students should be prepared to give their names to the cashier if the cashier does not know each child's name. The cashier identifies and marks the name on the roster as the student is served a reimbursable meal. See Form 12-1, Roster of Student Meals Served for a sample form.

The paper roster is coded so that the cashier can count the number of students in each of the meal categories following the meal service. Suggested coding methods are listed in Table 12.1 - Suggested Coding later in this chapter. Prepaid meals may be recorded on the roster by placing a diagonal line (/) or highlighting the box for each prepaid meal. If this is done, the boxes beside the names of students receiving free meal benefits must also be marked to make them appear as though they have prepaid. Any method must prevent overt identification of students eligible for free or reduced-price meals.

Rosters may also be electronic. These rosters generally contain the students' names and bar codes. The students' eligibility for free, reduced-price and paid meals is entered into the computer system in advance. As students pass through the serving line, the cashier matches the students' name to the bar coded roster and scans the bar code. Reduced-price accounts are debited the reduced meal charge and paid student meal accounts are debited the full price meal charge. The computer system tabulates the number of free, reduced-price and paid meals served each day.

### Coded Tickets or Meal Cards

Coded tickets can refer to paper tickets, automated tab tickets and computer system coded bar lines. Using this method, all students including those who prepay as well as those who receive free or reduced-price meal benefits receive a tangible object (ticket or meal card) that is later redeemed for a reimbursable meal.

Tickets or tokens may be issued or sold in the cafeteria, school office, or classroom, etc. They may be issued or sold in advance of the meal service on a daily, weekly, or monthly basis. Students receiving free and reduced-price meal benefits must be issued a ticket or token identical to the one issued to students who prepay in the paid category. The only permissible difference is variation in the code used by the person making the meal count determination to identify the meal category. Refer to Table 12.1 – Suggested Coding provided later in this chapter for acceptable methods. Whatever method of coding is used, care should be taken to prevent overt identification.

Tickets should be checked to assure they are presented by the students to whom they were issued. Following are several methods used to process tickets:

- Each student's ticket or token is examined as he/she receives a meal. A tally is made or a counting machine is pressed in a discreet manner for each meal served by category.
- Each student's ticket or token is collected as the student receives a meal. These are later counted by category, and unexpired tickets are returned to the students to use for the following meal service.
- The tickets have a coded tear-off stub for each lunch or breakfast. A stub is collected as each student receives a meal. The stubs are later counted by category. In an automated tab ticket system, the meal count by category is made simultaneously with the collection of the ticket.
- Each student is issued a coded bar line card that is scanned electronically. Each meal is counted by category when the card is scanned.

### **Personal Identification Numbers**

All students are assigned a Personal Identification Number (PIN). The students' eligibility for free, reduced-price and paid meals is entered into the computer system in advance. As students pass through the serving line, the PIN is entered. The student's name and/or picture is displayed on the computer screen and the cashier makes a positive identification. Paid student meal accounts are debited the full price meal charge; and reduced price eligible students are debited the reduced-price charge. The computer system tabulates the number of free, reduced-price and free meals served each day.

### **Computerized Systems**

A computer system can greatly simplify the meal counting and claiming process. These systems are capable of:

- Providing meal counts by category at the point-of-service.
- Preventing overt identification.
- Alerting the cashier when a student receives a second meal.
- Using prepayment plans to eliminate the exchange of money on the serving line.
- Producing reports of meals served, student meal category status, etc.
- Generating notices to households that funds have been depleted in the student's meal account.
- Allowing the cashier to permit or prohibit the sale of a la carte items or second meals based on parental preferences or the student's account balance.

The process of selecting a computerized accountability system is very complex and unique to the individual school or SFA. For assistance in defining your needs and identifying a system that will meet them effectively, contact the SCDE Office of Nutrition Programs at (803) 734-8188.

If an automated system is chosen, the SFA must have a back-up counting system in case of mechanical failure of the automated equipment.

## Table 12.1 - Suggested Coding

Consider these methods when determining how the medium of exchange will be coded.

Method	Examples
<b>Number Coding</b>	<ul style="list-style-type: none"><li>▪ Fourth digit in 4-digit number indicates eligibility category:<ul style="list-style-type: none"><li>○ 2751 = free</li><li>○ 9742 = reduced-price</li><li>○ 7353 = paid</li></ul></li><li>▪ Last number indicates eligibility category:<ul style="list-style-type: none"><li>○ Number ending with 0 = free (2370)</li><li>○ Number ending with an even number = reduced-price (5318)</li><li>○ Number ending with an odd number = paid (7193)</li></ul></li></ul>
<b>Number Coding by Series</b>	<ul style="list-style-type: none"><li>▪ 1 through 1999 = free</li><li>▪ 2000 through 3999 = reduced-price</li><li>▪ 4000 through 5999 = paid</li></ul>
<b>Coding by Variations</b>	<ul style="list-style-type: none"><li>▪ Variations in authorizing signatures:<ul style="list-style-type: none"><li>○ Mary Smith = free</li><li>○ Mary J. Smith = reduced-price</li><li>○ M. Smith = paid</li></ul></li><li>▪ Placement of date stamp:<ul style="list-style-type: none"><li>○ Top = free</li><li>○ Middle = reduced-price</li><li>○ Bottom = paid</li></ul></li></ul>
<b>Coding by Number of Digits</b>	<ul style="list-style-type: none"><li>▪ Variation in number of digits:<ul style="list-style-type: none"><li>○ 4 digits = free (3754)</li><li>○ 5 digits = reduced-price (74537)</li><li>○ 6 digits = paid (263746)</li></ul></li></ul>
<b>Computer-coded Student ID Numbers</b>	<ul style="list-style-type: none"><li>▪ ID numbers are assigned by the school and identified in the computer system as paid, reduced-price or free</li></ul>

### **Important!**

Color-coding by category, single-symbol coding or using obvious identifiers such as F, R, and P are prohibited.

## System Advantages and Disadvantages

System	Advantages	Disadvantages
<b>Paper Rosters</b>	<ul style="list-style-type: none"> <li>▪ Can be fast for elementary schools when students are lined up by classroom at the point-of-service</li> <li>▪ Inexpensive</li> <li>▪ Documentation of meal count is produced during the meal service as names are checked on a roster</li> <li>▪ It cannot be lost, stolen, or destroyed (by students)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be slow for secondary schools when students are not lined up in any order at the point-of service</li> <li>▪ Time consuming for cashier to record, count by meal category and notify households of payments needed</li> <li>▪ Can overtly identify free and reduced-price eligibility if not coded properly</li> <li>▪ If numbers are used, students may forget their number which slows down the line</li> <li>▪ Can be used by another student or twice by the same student if there is more than one serving line</li> </ul>
<b>Electronic Rosters</b>	<ul style="list-style-type: none"> <li>▪ Provides accurate count and saves time; compiles the meal count when the student is served</li> <li>▪ Can be fast for elementary schools when students are lined up by classroom</li> <li>▪ Prevents overt identification on the line</li> <li>▪ Allows households to deposit any amount of money into account</li> <li>▪ Money may be used for breakfast, lunch or a la carte</li> </ul>	<ul style="list-style-type: none"> <li>▪ Start up and operating costs may be high</li> <li>▪ Can be slow for secondary schools when students are not lined up in any order</li> <li>▪ There may be two meals claimed per student if more than one service line is available and the machines are not networked</li> </ul>
<b>Paper Tickets</b>	<ul style="list-style-type: none"> <li>▪ When collected at point-of-service, provides a means to physically count meals by category</li> <li>▪ When used in small to medium schools, counts by category can be completed quickly after the meal service</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be destroyed, transferred, lost, stolen or sold</li> <li>▪ In large schools, too cumbersome to collect and count all tickets or token by category after the meal service</li> <li>▪ Counts must be made at the point-of-service, which can slow down the line</li> <li>▪ If not coded properly, may result in overt identification</li> <li>▪ Requires cashier to record and write information on each ticket as issued</li> </ul>

## System Advantages and Disadvantages continued

System	Advantages	Disadvantages
<b>Automated Tab Ticket</b>	<ul style="list-style-type: none"> <li>▪ Saves time because count is taken automatically when tickets are collected</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be destroyed, lost, stolen, or transferred</li> </ul>
<b>Computer System Coded Bar Line</b>	<ul style="list-style-type: none"> <li>▪ Provides accurate count and saves time; compiles the meal count automatically when the student's card is scanned</li> <li>▪ Prevents overt identification on the line</li> <li>▪ Provides automated reports</li> <li>▪ Allows household to deposit any amount of money into account</li> <li>▪ Money may be used for breakfast, lunch or a la carte</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be lost, destroyed, or transferred</li> <li>▪ Start up and operating costs may be high</li> <li>▪ There may be two meals claimed per student if more than one service line is available and the machines are not linked</li> </ul>
<b>Computer System Personal Identification Number (PIN)</b>	<ul style="list-style-type: none"> <li>▪ Provides accurate count and saves time; compiles the meal count automatically when the student's PIN is entered</li> <li>▪ Prevents overt identification on the line</li> <li>▪ Provides automated reports</li> <li>▪ Allows household to deposit any amount of money into account</li> <li>▪ Money may be used for breakfast, lunch or a la carte</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be forgotten or misused</li> <li>▪ If picture is not displayed on screen, cashier must know students to assure they use correct PIN</li> <li>▪ Start up and operating costs may be high</li> <li>▪ There may be two meals claimed per student if more than one service line is available and the machines are not linked</li> </ul>
<b>Coded ID Cards</b>	<ul style="list-style-type: none"> <li>▪ Is not easily transferred if a photo is on the card</li> <li>▪ Can be incorporated as a function of the student ID card, which may be a savings to SFA</li> </ul>	<ul style="list-style-type: none"> <li>▪ Can be lost, stolen, or destroyed</li> <li>▪ Students may be able to use it twice if there is more than one serving line.</li> <li>▪ It may involve a high replacement cost.</li> </ul>

## Unacceptable Accountability Systems

The following meal counting systems are **not** acceptable because they do not provide a daily point-of-service count of reimbursable meals by category for meals served in a cafeteria.

- **Attendance counts:** The number of students in attendance does **not** provide a count of meals actually served. Only meals actually served may be claimed for reimbursement.
- **Tray or entrée counts:** The number of trays or entrees served does **not** provide an accurate count of meals served. There are no controls to ensure that trays contain all the necessary food items; that trays were not stuck together; that each entrée was part of a complete meal; that some trays were served to adults, etc. Each meal must be monitored to ensure that all the meal requirements have been met.
- **Classroom counts:** Students who “intend” to eat may not actually do so. The count taken prior to the meal service will not reflect those changes and may not be accurate. There are no controls at the point-of-service to ensure that the meals counted are actually reimbursable. Food production should be based on past participation trends as documented in production records instead of morning counts.
- **Counts taken anywhere other than at the point-of-service** (unless approved by SCDE): The **only** place an accurate count of reimbursable meals can be made is at the point where it can be determined that the meals are actually reimbursable. The end of the serving line is considered the “point of service.”
- **Prepaid/charged meals counted on day paid:** When students either prepay or charge their meals, these meals must be counted on the day that the student is served the meal, not on the day that the prepaid meal was purchased or the charged meal was prepaid.
- **Category/cash back-out system:** A positive count of each meal category is required. Count all free meals, count all reduced-price meals and count all paid meals independently. One or more of the meal categories **cannot** be subtracted from total meals to determine the count of meals in the remaining category.
- **Cash converted to meals:** Using cash or sales figures to determine the number of meals served does **not** provide a count of reimbursable meals (and also allows cash collection errors to translate into meal count errors).
- **Delivery counts of meals produced off-site:** The number of meals delivered to a school is not necessarily the number of meals actually served.
- **Visual identification without back-up:** All meal counts must be recorded with approved meal accountability procedures.
- **A la carte items claimed for reimbursement:** Food items sold independently of the reimbursable meal and not priced as a unit may not be claimed for reimbursement. Only meals priced as a unit, offered to all students regardless of category (free, reduced-price, paid) and meeting meal pattern requirements are eligible for reimbursement.
- **Second meals claimed for reimbursement:** Second meals served to students in any category must **not** be claimed for reimbursement. SFAs can claim only one meal per eligible student per day per type of meal service (breakfast, lunch or snack).

- **Ineligible person claimed for reimbursement:** Only enrolled students are eligible for reimbursable meals. Meals served to ineligible students, adults, younger siblings or visitors may not be claimed for reimbursement.
- **Improper implementation of approved accountability procedures:** Even if the system is approved on paper, all necessary procedures must be followed in order for the meal count system to be acceptable. All meal accountability staff should be adequately trained in their responsibilities.

### **Students Specify a Menu Choice in Advance of Service**

**Q-1** *If the SFA uses an advance meal count to determine how many portions of a menu item to prepare, can the student be required to pay for the ordered meal if the student is not served the meal?*

**A** No, SFAs may not charge households for meals individual students have not been served, even if a student has indicated he/she intends to eat the meal.



**Q2** *Some SFAs require students to sign up in advance for a specific menu option. If a student indicates in advance that they will select a specific menu option (chef salad, peanut butter and jelly sandwich or alternate entrée), can the SFA require the student to take that menu selection?*

**A** Yes, SFAs may require the student to take the menu option previously selected. However, SFAs should primarily rely on food production records to forecast the number of menu items needed.

## **Meal Accountability Policies**

### **One Breakfast/Lunch/Snack Per Child Per Day**

National School Lunch Program (NSLP) regulations state that SFAs shall plan for and prepare school meals on the basis of participation trends, with the objective of providing one breakfast/lunch/ snack per child per day. Only one lunch and/or one breakfast and/or one snack per student per day may be claimed for reimbursement. The following steps assure compliance with this regulation:

- Be aware of participation fluctuations. Perhaps there are certain days of the week when participation regularly dips or peaks. Students are more likely to eat when their favorite menu is served. The manager should plan the amount of food needed to provide each student with one meal.
- Keep accurate production records. (See Chapter 20 – Food Production Records in this *Program Reference Manual* for additional information.)
- Despite careful planning, fluctuation in participation occurs. If second meals are served, they must not be claimed for reimbursement

### **Serving Second Meals or Non-Reimbursable Meals**

When a student purchases a second breakfast or lunch, the meal cannot be claimed for reimbursement. Since no federal or state reimbursement is received for these second meals, they should be priced the same as adult meals.

When a student refuses to select the minimum food items required for a reimbursable meal, the meal cannot be claimed for reimbursement. SFAs may either ask the student to return for additional food items so the meal will meet minimum requirements or choose not to claim the meal.

### **Claiming Meals for Student Workers**

USDA regulations state that recipients of free and reduced-price meals shall not be required to work for those benefits. However, students are not prohibited from voluntarily working in the cafeteria. Meals served to students who work in the cafeteria are eligible for reimbursement. They must be claimed in the category in which the student is eligible. The count must be taken at the point of service to assure a complete meal is served.

### **Serving Kindergarten and Enrolled Preschool Students**

Meals served to preschool children enrolled in an SFA's educational programs may be claimed for meal reimbursement under the NSLP and School Breakfast Program. Eligibility documentation must be maintained on file for all free and reduced-price meals claimed for reimbursement.

- A kindergarten or pre-kindergarten student who eats an occasional meal may be claimed in the appropriate eligibility category provided that documentation is on file.
- A kindergarten or pre-kindergarten student who normally participates in the Special Milk Program, but eat an occasional school meal, may be claimed for either Special Milk or school breakfast/lunch reimbursement, but not for both on the same day.
- Kindergarten or pre-kindergarten programs that offer school breakfast or lunch to all enrolled students may not participate in the Special Milk Program.

### **Serving Older Students**

Meals served to students 18 years of age and older can be claimed for reimbursement only if

- They are a "regular student" (that is, they are included in the SFA's reported enrollment count of all students) or
- They are in a daytime General Educational Development (GED) program.

These meals must be served during normal meal times. Matters related to free and reduced-price eligibility for these individuals are the same as other students.

Reimbursement cannot be claimed for any adult participating in non-GED adult education programs (including Even Start) regardless of scheduling time or evening GED programs. These individuals should pay the regular adult meal price.

### **Serving Visiting Students**

Meals served to students who are visiting from other schools during a specific school function (e.g. vocal competition, band day) can be claimed for meal reimbursement. The students' meals may be claimed by category for reimbursement if the visiting SFA provides the host SFA

with each student's eligibility determination. If the visiting SFA does not provide this information or if they are from an SFA that does not participate in the CNP, the host SFA may claim reimbursement for the meals served to the students in the paid category. A school official must explain the reason for the high meal count on the meal count form used by the SFA (e.g. Form 12-C, Daily Record of Lunches Served). Meals served to individual school-age guests who are not participating in a specific school function may not be claimed for reimbursement.

### **Serving Students Off-Site**

The CNP regulations require reimbursable meals to be served on school premises or at a school-related location. Meals taken off-site are not reimbursable. Meals given to students to eat on the bus and meals taken home with students due to early dismissal are not reimbursable.

Meals consumed on school-sponsored and supervised field trips may be reimbursed if the meals are prepared by the CNP staff, meet meal pattern requirements and are served and consumed as part of a school-related function. A list, roster, or other method of claiming the meals by category must be used to record counts. See Form 12-I, Roster of Student Meals Served provided in this chapter of the *Program Reference Manual* for a sample form. Refer to Chapter 6 – Meal Service Policies in this *Program Reference Manual* for more information concerning school-prepared sack lunches. Extra caution should be taken during field trips to keep the food safe. Refer to Chapter 30 – Safety & Sanitation for additional information on how to keep food safe.

### **Serving Students in Alternative/Cooperative Schools**

Many public school districts participate in some type of alternative/cooperative school or campus that serves students from several districts. Procedures for maintaining applications and the counting and claiming of reimbursable meals must be established.

It is acceptable for the "host SFA" (i.e. the physical site where the student attends school) to keep a copy of the students' application, Direct Certification letters or a roster with each student's eligibility on file from the "sending SFA." To protect the confidentiality of the student's eligibility information, CNP applications and Direct Certification letters should never be faxed.

The host SFA provides meal service and may claim reimbursement for eligible students in the proper category. A student's attendance in such a school may be short-term (a few days) or long-term (entire school year). Adjustments and notations should be entered on the meal accountability records to justify the claim when applicable and to document current numbers of approved students. If the SFA wants to use a different procedure than the ones mentioned here, contact SCDE at (803) 734-8188.

### **Serving Guests**

Adults, visiting students and very young children who visit the program must pay the adult meal price or an established guest meal charge. An SFA may wish to establish a meal price for very young children. If the SFA does not set a separate price for very young children, the adult meal price must be paid for the child's meal. Guest meals cannot be claimed for reimbursement.

### **Agency Records**

A household's eligibility may be confirmed through the use of information maintained by other government agencies to which the SFA has legal access. Although regulations do not require that the household be notified of selection when verification is made through agency records, such agencies may have their own notification requirements.

## Accepting Cash at the Point-of-Service

If cash is accepted at the point-of-service, a prepayment or post-billing system should also be in place to prevent overt identification of a student's eligibility category. The SFA should:

1. Actively promote prepayment for reduced-price and paid meals so that overt identification of the eligibility category does not occur. The first step in getting students to prepay is widespread and continuing publicity advertising the availability of the prepayment option. To be successful, a prepayment promotion should also include incentives for students to prepay.
2. Prepayment must be accessible and convenient for students. Students should be able to prepay for their meals in a common location at designated times during the week so that overt identification of the student's eligibility category is prevented.
3. Cash accepted on the serving line for reduced-price and paid meals must be deposited into the student's account. The price for the reimbursable meal would then be deducted from the student's account, thus concealing the amount paid for the meal.
4. Instruct cashiers to use language that does not overtly identify eligibility status when cash is received on the serving line (e.g. "Thank you," or "Shall I put all of this in your account?"). A payment system does not meet program requirements if it displays a balance paid/due or the student's eligibility category.
5. Monitor procedures for accepting cash on the serving line by using Form 12-A, On-Site SFA Review of Counting and Claiming Procedures.

In meal accountability systems that allow reduced-price eligible students to pay cash for their meals at the point-of-service, the cashier must have a way to determine if a student is to pay the reduced-price or the paid price. To obtain an accurate meal count by category without overtly identifying the student's eligibility category, the cashier may use a coded roster listing all paid, reduced-price and free students; record the names of all paid and reduced-price students paying with cash on the serving line; or enter the student's name and amount received into the electronic accountability system.

## Charging Meals

Refer to "Meal Charging Policy" in Chapter 7 – Meal Pricing. If students are allowed to charge a school meal, the SFA must ensure that the student's eligibility category is not overtly identified. Regardless of the type of accountability system used, the SFA must ensure that the names of students who charge meals are recorded and the charged meals are counted in the appropriate eligibility category.

### Charging Meals

**Q-3** *If a student has exceeded the school's charge limit and the school offers the student substitute foods (for example, a peanut butter sandwich and milk) rather than the reimbursable school meal, may the substitute foods be claimed for reimbursement?*

**A** No. Only meals that meet the meal pattern requirements may be claimed for reimbursement.



**Q-4** *If a student has reached the school's charge limit, may the school deny the student service of a meal?*

**A** If a student in the reduced priced or paid category has charged meals in excess of the SFA's established policy, the student may be required to pay for the meal prior to being served. Students eligible for free meals may not be denied a reimbursable meal, regardless of the number of "charges" the child has made in the past. For additional information, refer to "Serving Students with No Money and Without a Lunch from Home" in Chapter 6 – Meal Service Policies and to "Meal Charging Policy" in Chapter 7 – Meal Pricing.

### **Exchanging/Borrowing Tickets**

Exchanging or borrowing meal tickets/cards is prohibited in order to protect the confidentiality of students' eligibility category and to ensure that all meals are claimed in the correct eligibility category.

### **Lost, Stolen, Misused or Damaged Meal Tickets/Cards**

USDA instructions regarding handling lost, stolen, misused and damaged free, reduced price and paid tickets state that schools may establish their own procedures regarding this matter, except that any system that limits the number of tickets reissued must conform to the standards described in the section entitled, "Serving Students with Lost, Stolen, Misused or Damaged Meal Tickets" in Chapter 6 – Meal Service Policies.

In addition to these regulations, the following guidelines must be followed:

- The ticket/card replacement policy should be the same for free, reduced price and paid students.
- All tickets/cards should identify the student by name in order to prevent the possible re-use of lost or stolen tickets.
- SFAs may use a variety of procedures for counting student meals. SFAs that use automated systems with bar coded tickets/cards must not create barriers to participation when ticket/cards have been lost, stolen, misused or damaged.
- When replacing a paper ticket, SFAs should make every effort to provide a replacement with the same number of meals as were left on the lost, stolen, misused or damaged ticket.

### **Money in Account but No Ticket**

**Q-5** *When a student does not have a meal card, but has money in his/her meal account, may the school deny the student a meal?*

**A** No. A system must be established to allow the student to eat the meal. See Chapter 6 – Meal Service Policies for additional information.

## **Misplaced Meal Tickets/Cards**

If an SFA issues meal tickets or cards, an alternate procedure should 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. Suggested procedures and ways to reduce the number of students that come to the line without tickets are provided in [Chapter 6 – Meal Service Policies](#) in the section entitled [“Serving Students with Misplaced Meal Tickets/Cards.”](#)

## **Making Changes**

Updates to the SCAPS profile (including counting and claiming processes) should be done prior to the implementation of any changes. Certain changes may require additional documentation, as determined and requested by SCDE on a case-by-case basis.

## **On-Site Accountability Reviews**

Federal regulations require SFAs with multiple serving sites to conduct an annual on-site accountability review of each serving site. SFAs with only one serving site are exempt from this requirement. All initial on-site reviews must be completed by February 1.

### **Person Completing the Review**

Someone who is not involved with the daily operation of the system must complete the review. Examples of persons who may complete the reviews include the authorized representative, superintendent and food service director. A building principal should not conduct the review in his/her own building but may conduct the review at other serving sites.

### **Goals of the Review**

The review should, at a minimum, ensure that:

- The counting system is consistent with that described on the SFA’s “Meal Count/Collection Procedures” in the SCAPS profile information as approved by SCDE;
- The counting system, as implemented, yields the actual number of reimbursable free, reduced-price, and paid lunches served for each day of operation;
- The counting system prevents overt identification of students receiving free and reduced-price lunches; and
- The system provides for adequate monitoring to ensure that only reimbursable meals are counted.

### **Review of Applications**

Because accurate meal counts are dependent on accurately approved meal applications, SCDE recommends that free and reduced-price meal applications also be reviewed. An initial sampling of 100 applications per serving site is suggested. If problems are found, all applications should be reviewed.

### **Corrective Action Plan and Follow-up Review**

If the initial on-site review identifies problems with the school’s meal counting or claiming procedures, the school must develop and implement a corrective action plan. The plan must be in writing and should be developed jointly by the school food service manager and the SFA food

service supervisor, director or the person who conducted the review. It should detail the corrective action necessary to bring the serving site into compliance and assign responsibility for implementing each step of the plan.

The SFA must conduct a follow-up on-site review within 45 calendar days of the initial review to ensure that all problems have been resolved.

### **On-Site Review Form and Record Keeping**

Form 12-A, On-Site SFA Review of Counting and Claiming Procedures has been provided at the end of this chapter. It should be copied and used to conduct the on-site review at each serving site. The completed review forms should be kept on file with the SFA's other food service records for review by SCDE staff. Do not send the completed form to SCDE.

## On-Site SFA Review of Counting and Claiming Procedures

By February 1, School Food Authorities (SFAs) with more than one serving site must visit each site while lunch is being served and complete this form for each site. Someone not involved in the daily meal accountability procedures at the site must conduct a review using this (or a similar) form. Keep completed reviews on file with school CNP documents for review or audit. Do not send completed reviews to the SC Department of Education.

School: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Attendance Factor: _____ %			
	<b>Prior Month ADP*</b>	<b>Meal Count on Day of Review</b>	<b>No. of Students Currently Approved</b>
Free	_____	_____	_____
Reduced-Price	_____	_____	_____
Paid	_____	_____	_____

\* ADP = Average Daily Participation

<b>I.</b>	<b><i>Point-of-Sale Training</i></b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
	1. Does the meal counter know how many items constitute a reimbursable meal?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	2. Does the meal counter know how to charge and record non-reimbursable meals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>II.</b>	<b><i>Master List</i></b>			
	3. Is a master list used in the meal system?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	4. Do names listed on the master list match approved applications on file and on the direct certification, homeless/runaway and migrant lists?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	5. If more than one list is used (e.g. master list/food service line roster), then are all lists the same?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	6. Are all lists/databases updated as needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>III.</b>	<b><i>Meal Count System</i></b>			
	7. Does the meal count system produce an accurate count of reimbursable meals (free/reduced-price/paid) served to eligible children daily?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	a. Does the collection procedure in use match the procedure submitted to and approved by SCDE in the Policy Agreement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. If the meal count is not taken at the end of the service line, does the school have a system approved by SCDE to account for reimbursable meals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	c. Are only meals that meet meal requirements counted and claimed for reimbursement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	d. Does the collection procedure in use ensure that only one meal per child per day is claimed for reimbursement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	8. Does the meal count system prevent overt identification?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	a. Is the medium of exchange made available to all students at the same location?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	b. Does the medium of exchange use SCDE-approved codes for identifying students as free, reduced-price or paid?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	9. Does the school have a trained substitute cashier?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	10. Does the school have a backup roster in case of computer failure?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

20250-9410 or call (800) 795-3272 (voice) or (202) 720-6382 (TTY). USDA is an equal opportunity provider and employer.

**On-Site SFA Review of Counting and Claiming Procedures (continued)**

<b>IV.</b>	<b><i>Meal Count Recording and Edit Checks</i></b>	<b>YES</b>	<b>NO</b>	<b>N/A</b>
	11. Does the school use proper procedures for counting and recording meals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	12. For any day during one month, does the number claimed for free and reduced-price meals exceed the number of free and reduced-price eligible (edit check)? Month Reviewed: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	13. For any day during the same month, does the number of meals claimed exceed the attendance factor? Month Reviewed: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	14. Does the school have proper procedures to manage and safeguard cash (e.g. reconciliation, extra item sales, adult meals, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>V.</b>	<b><i>System with Cash at Point of Sale</i></b>			
	15. Is there a second-party count of cash deposit?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	16. Is cash reconciled daily and differences recorded?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	17. Is it ensured that counts are not adjusted or "backed out" to correspond with cash intake?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VI.</b>	<b><i>Results of Review</i></b>			
	18. Is a corrective action plan required?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	19. If a corrective action plan was required, was the follow-up review conducted within 45 days of the initial review to ensure that the school has implemented all required changes and that all problems have been resolved?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>VII.</b>	<b><i>Comments, Notes and Observations During the Review</i></b>			
<b>VIII.</b>	<b><i>Corrective Action Required</i></b>			

_____ Reviewer's Signature	_____ Reviewer's Title	_____ Date of Initial Review
_____ School Official's Signature	_____ School Official's Title	_____ Date of Initial Review
_____ School Official's Signature	_____ School Official's Title	_____ Date of Follow-up Review

## Evaluating Your Accountability System

Ask the following questions about the current meal counting procedures. If the answer to any of these questions is "Yes," the counting procedures are **not** adequate and must be revised.

- |    | <u>Yes</u>               | <u>No</u>                |  |
|----|--------------------------|--------------------------|--|
| 1. | <input type="checkbox"/> | <input type="checkbox"/> | Are claims based solely on meal or milk counts taken in the morning in the classroom or at any other location before the meal or milk is served?   |
| 2. | <input type="checkbox"/> | <input type="checkbox"/> | Are claims based on attendance records?  |
| 3. | <input type="checkbox"/> | <input type="checkbox"/> | Are meal or milk counts based on the number of tickets/tokens sold and distributed or the number of meals purchased in advance?  |
| 4. | <input type="checkbox"/> | <input type="checkbox"/> | Is the number of free or reduced-price meals or free milk claimed based only on the number of children eligible to receive such meals or milk?   |
| 5. | <input type="checkbox"/> | <input type="checkbox"/> | Are meal counts taken without monitoring meals after the last food item is offered to ensure that the meals are reimbursable?  |
| 6. | <input type="checkbox"/> | <input type="checkbox"/> | Are meal counts based solely on visual identification of students with no back-up procedures available for persons not familiar with students (e.g. checklists)?                             |
| 7. | <input type="checkbox"/> | <input type="checkbox"/> | Are meal counts based solely on tray or plate counts?  |
| 8. | <input type="checkbox"/> | <input type="checkbox"/> | Are back-out procedures used which subtract one number (e.g. number of free and reduced-price eligible children) from the total count to get another number (e.g. the number of paid meals)? |

## Daily Record of Lunches Served

School: \_\_\_\_\_

Month: \_\_\_\_\_

Year: \_\_\_\_\_

Day of Month (a)	Student Lunches				Edit Checks			Adult & Guest Lunches			Local Use (l)		
	Reimbursable				Non-reimbursable (f)	Meal Type (g)			Explanation of any count that exceeds edit check (h)	Paid (i)		Gratis Food Service (j)	Gratis Other (k)
	Free (b)	Reduced Price (c)	Paid (d)	Total (e)		F	R	P					
1													
2													
3													
4													
5													
6													
7													
8													
9													
10													
11													
12													
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27													
28													
29													
30													
31													
<b>TOTAL</b>													
	<b>Total Days Lunch Served</b>												

### Compute Edit Check Maximums

Enter school's Attendance Factor (A) and maximum number of students eligible in each category on any day of the month. Then multiply (A) times number of eligible/approved students (B, C, D).

- |   |   |
|---|---|
| A. _____ Attendance Factor (Avg. Attendance/Total Enrollment) | E. _____ Total Eligible Students                            |
| B. _____ Enrolled Free Students                               | F. _____ A (x) D = Edit Check Maximum Paid Lunches          |
| C. _____ Approved Reduced Price Students                      | G. _____ A (x) C = Edit Check Maximum Reduced Price Lunches |
| D. _____ Approved Paid Students                               | H. _____ A (x) B = Edit Check Maximum Free Lunches          |

## Instructions for Completing Daily Record of Lunches Served

Complete this form daily. Give the completed form to the Authorized Representative for preparation of reports. The data is necessary for computing reimbursement claims.

### Column:

- a..... Omit dates meals are not served.
- b..... Enter number of reimbursable lunches served to students who are approved for free benefits.
- c..... Enter number of reimbursable lunches served to students who are approved for reduced-price benefits.
- d..... Enter number of reimbursable paid lunches served to students.
- e..... Total columns b, c, and d.
- f..... Enter number of non-reimbursable lunches served to students. Non-reimbursable lunches include seconds served to students and lunches that do not include all required food items.
- g..... Compare computed Edit Check Maximum for each meal category (free, reduced-price and paid) to the number of meals served. If the number of meals served is greater than the Edit Check Maximum, put an "X" in the respective column (F, R, P). If the number of meals served is less than or equal to the Edit Check Maximum, put a "✓" in the respective column (F, R, P). All "X" marks must be explained in column h (see instructions below).
- h..... Record comments for any count that exceeds the Edit Check Maximum (i.e. those marked "X"). Recheck the number of meals recorded to ensure that no errors were made. If no errors were made, note reason for exception. A code of exception can be established. For example: 1 = High count because of high attendance, accountability rechecked, no errors noted; 2 = High count because of popular menu, accountability rechecked, no errors noted; 3 = Holiday or special meal.
- i..... Enter number of lunches served to adults/guests for which payment is received. This column also includes lunches served to children not enrolled in the district/school, parents, grandparents, other guests, etc.
- j..... Enter number of gratis lunches served to adults who work in the food service operation.
- k..... Enter number of gratis lunches served to adults who do **not** work in the food service operation.

**Total** Total the number of meals served in each column.

**Total Days Lunches Served:** Enter the total number of days on which lunches were served this month.

### Edit Checks:

- A..... Enter the school's Attendance Factor (AF). Compute this by dividing the average daily attendance by the enrollment.
- B..... Enter the maximum number of students approved for the free benefits on any day of this month.
- C..... Enter the maximum number of students approved for reduced-price benefits on any day of this month.
- D..... Enter the maximum number of students enrolled in the paid category on any day of this month.
- E..... Total items B, C, and D.
- F..... Multiply A (x) B to compute the Edit Check Maximum Free Meals. Round up to the nearest whole number.
- G..... Multiply A (x) C to compute the Edit Check Maximum Reduced-Price Meals. Round up to the nearest whole number.
- H..... Multiply A (x) D to compute the Edit Check Maximum Paid Meals. Round up to the nearest whole number.



## Instructions for Completing Daily Record of Breakfasts Served

Complete this form daily. Give the completed form to the Authorized Representative for preparation of reports. The data reported in each column is necessary for computing reimbursement claims.

**Maximum Number** Enter the maximum number of students eligible for free, reduced-price, and paid breakfasts. Enter the total number of eligible students.

### Column

**a**..... Omit dates breakfasts are not served.

**b**..... Enter number of reimbursable breakfasts served to students who are approved for free benefits.

**c**..... Enter number of reimbursable breakfasts served to students who are approved for reduced-price benefits.

**d**..... Enter number of reimbursable breakfasts served to students in the paid category.

**e**..... Total columns b, c, and d.

**f**..... Enter number of non-reimbursable breakfasts served to students. Non-reimbursable breakfasts include second breakfasts served to students and breakfasts that do not include all required food items.

**g**..... Enter number of breakfasts served to adults/guests for which payment is received. This column also includes breakfasts served to children not enrolled in the district/school, parents, grandparents, other guests, etc.

**h**..... Enter number of gratis breakfasts served to all adults who work in the food service operation.

**i**..... Enter number of gratis breakfasts served to all adults who do **not** work in the food service operation.

**Total Days Breakfasts Served** Enter the total number of days breakfast was served this month.



## Instructions for Completing Daily Record of Snacks Served

Complete this form daily. Give the completed form to the Authorized Representative for preparation of reports. The data reported in each column is necessary for computing reimbursement claims.

**Maximum Number** Enter the maximum number of students eligible for free, reduced-price, and paid snacks. Enter the total number of eligible students.

### Column

- a..... Omit dates snacks are not served.
- b..... Enter number of reimbursable snacks served to students who are approved for free benefits.
- c..... Enter number of reimbursable snacks served to students who are approved for reduced-price benefits.
- d..... Enter number of reimbursable snacks served to students in the paid category.
- e..... Total columns b, c, and d.
- f..... Enter number of non-reimbursable snacks served to students. Non-reimbursable snacks include second snacks served to students and snacks that do not include all required food items.
- g..... Enter number of snacks served to adults/guests for which payment is received. This column also includes snacks served to children not enrolled in the district/school, parents, grandparents, other guests, etc.
- h..... Enter number of gratis snacks served to all adults who work in the food service operation.
- i..... Enter number of gratis snacks served to all adults who do **not** work in the food service operation.

**Total Days Snacks Served** Enter the total number of days snacks were served this month.

## Daily Record of Milk Served and Income Received

For use by SFAs participating **only** in the Special Milk Program.

School: \_\_\_\_\_ Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day of Month (a)	Units Delivered (b)	Student Milk			Adult Milk	Milk Income	
		Paid Units Served (c)	Free Units Served (d)	Total Units Served (e)	Units Served (f)	Sales to Students (g)	Sales to Adults (h)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
<b>TOTAL</b>							

- Milk Inventory: A \_\_\_\_\_ Opening Inventory = Number of half-pint units carried over from the preceding month  
 B \_\_\_\_\_ Total Units Delivered = Total of column (b) above  
 C \_\_\_\_\_ Total Units Available = A + B  
 D \_\_\_\_\_ Total Units Served to Students and Adults = Total of columns (e) and (f) above

## Instructions for Completing Daily Record of Milk Served and Income Received

Use of this form is recommended. If alternate forms are developed and used, they must collect the same information. Complete this, or a similar form, daily. Give the completed form to the authorized representative for preparation of reports. The data reported in each column is necessary for computing reimbursement.

### Column

- a..... Omit dates milk is not served.
- b..... Enter total number of ½-pint milk units delivered.
- c..... Enter number of ½-pint milk units served to students **not** approved for Free Milk benefits. If students do not pay for milk because other program funds are used, milk served to students not approved for Free Milk is to be recorded as Paid Milk.
- d..... Enter number of ½-pint milk units served to students who are approved for Free Milk benefits.
- e..... Total columns c and d.
- f..... Enter total number of ½-pint milk units served to adults.
- g..... Enter the amount of income for milk served to students for each day that money is received. There may be as many entries as the maximum number of school days or as few as one per month.
- h..... Enter the amount of income for milk served to adults for each day that money is received. There may be as many entries as the maximum number of school days or as few as one per month.

**Milk Inventory:** On the last day of the month, the number of milk units carried over to the next month must be counted and recorded. Fill in the blanks and use the formula provided to compute the closing inventory. The computed closing inventory should be equal to the physical inventory of milk units.

## Daily Record of Special Milk Served

For use by SFAs participating in the Special Milk Program for split session Pre-Kindergarten and Kindergarten students.

School: \_\_\_\_\_ Month: \_\_\_\_\_ Year: \_\_\_\_\_

Maximum number pre-K and K students approved for SPECIAL MILK on any day during month: **Paid:** \_\_\_\_\_ **Free:** \_\_\_\_\_ **Total:** \_\_\_\_\_

Day of Month (a)	Special Milk		Total Milk (d)	Adult Milk	Local Use (f)	Local Use (g)
	Pre-K & K Paid Milk (b)	Pre-K & K Free Milk (c)		Adult Paid (e)		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
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25						
26						
27						
28						
29						
30						
31						
<b>TOTAL</b>						
	<b>Total Days Special Milk Served</b>					

Use of this form is recommended. If alternate forms are developed and used, they should collect the same information.

Complete this, or a similar form, daily. At the end of the month, make the completed form available to the authorized representative for preparation of reports. The data is necessary for computing the reimbursement claim.

**Maximum Number**..... Enter the maximum number of pre-kindergarten and kindergarten students eligible for Paid and Free Special Milk.

**Column**

- a..... Omit dates milk is not served.
- b..... Enter number of Paid Milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program.
- c..... Enter number of Free Milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program. If students do not pay for milk because other program funds are used, milk served to students not approved for Free Milk is to be recorded as Paid Milk.
- d..... Enter total number of milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program.
- e..... Enter number of milk units served to adults.
- f..... Local use column
- g..... Local use column

### Participation Roster for USDA Meal Reimbursement - RCCIs

RCCI: \_\_\_\_\_ Meal:  Breakfast  Lunch  Snack Meals Served for Month of: \_\_\_\_\_ Year: \_\_\_\_\_

Enrollment Date	Withdrawal Date	Name of Child	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31		
1																																			1
2																																			2
3																																			3
4																																			4
5																																			5
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27																																			27
28																																			28
29																																			29
30																																			30
<b>Daily Total:</b>																																			

**Important Points:**

- The RCCI week is a 7-day week.
- The Afterschool Snack Program is a 5-day program.
- Meal counts must be taken at the point-of-service (end of serving line).
- Family style counts should be taken at the table.
- Enter **MONTHLY TOTAL** on SLP-4 form.

<b>Monthly Total:</b>





**South Carolina**  
**School Food Service Program Reference Manual**  
**Contributor: Sharon Hunt and Lorrie Gregory**  
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# Chapter 13 – Ethics

## Business Ethics Overview

“Ethics” is defined as “the principles of conduct governing an individual or a group.” The human condition has historically inspired philosophers to attempt to establish a set of rules and practices to direct behavior. While there is still debate about what is “ethical” or “unethical,” this chapter will discuss regulatory definitions of acceptable and unacceptable business practices.

### Fraud Statement from Federal Regulations

Whoever embezzles, willfully misapplies, steals, or obtains by fraud any funds, assets, or property provided under the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) , whether received directly or indirectly, shall, if such funds, assets, or property are of a value of \$100 or more, be fined no more than \$10,000 or imprisoned not more than five years or both; or if such funds, assets, or property are of a value less than \$100, be fined no more than \$1,000 or imprisoned not more than one year or both. Whoever receives, conceals, or retains for personal use or gain, funds, assets, or property provided under the NSLP and SBP, whether received directly or indirectly, knowing such funds, assets, or property have been embezzled, willfully misapplied, stolen, or obtained by fraud, shall be subject to the same penalties. (Federal Regulation: 7-CFR-245.12)

### Food Taken From Schools

The NSLP and SBP are designed and funded to serve children in the school cafeteria. No food, not even leftover food, is to be taken from the premises. Taking food from the cafeteria may create a serious public relations problem by causing people to lose faith in the integrity of the program(s). Food may only be taken from the school for school-sponsored field trips or in connection with a school-sponsored gleaning program administered by the U.S. Department of Agriculture (USDA).

The above does not prohibit students eligible for free, reduced-price, or paid meals or adults from taking all or portions of their own breakfasts, lunches, or a la carte foods from the cafeteria or off campus if approved by the local school. Exceptions to this policy must be approved in school board meeting minutes or board policy.

Leftover foods that cannot be used within the school food service operation and are safe and nutritious may be donated to a formally organized food reclamation program. See Chapter 29 – Food Service Related Programs provided in this *Program Reference Manual* for additional information on the release of leftover food.

### Employees Purchasing Foods

Q-1 *May school employees purchase meals or leftover food to take home?*

A No. Even if the money was deposited in the food service account, program regulations state that any food prepared for the Child Nutrition Programs must be consumed on school premises. See Chapter 29 – Food Service Related Programs for the policy concerning the release of leftover food.

## Purchasing Ethics

The competitive nature of public purchasing and the expenditure of significant amounts of public funds require that ethical standards be incorporated into all purchasing functions. Purchasing personnel and School Food Authority (SFA) staff face the difficult task of developing good vendor relations and encouraging vendor competition while avoiding even the appearance of favoritism or other misconduct. Numerous problems may be encountered such as:

- Employees, in an effort to get the job done successfully and on time, are tempted to avoid policies, procedures, and laws or to make their own “legal” interpretations of existing policies. Such activity, although generally well-intentioned, may cause ethical or legal problems.
- When informal purchasing procedures are used to make repeated purchases of the same items or types of items over the course of 12 months, it may appear that requirements to use formal purchasing procedures are being circumvented. This situation may occur due to lack of centralized control of the purchasing function. Although some sequential purchasing may occur using informal purchasing procedures, it is important to assure that formal purchase procedures are used when required.
- An item (usually equipment) is purchased in component parts. Component purchasing usually is an attempt to avoid bid laws or other requirements by buying an item through the issuance of multiple purchase orders for the component parts of the item versus a single purchase order for the entire item. Repeated purchases of additional optional equipment or parts after an initial purchase may create the perception of component purchasing.

The SFA should clearly communicate to all personnel policies related to:

- Dealing with conflicts of interest.
- Having financial interests in firms conducting business with the SFA.
- Accepting kickbacks and gratuities.
- Improper use of a position or confidential information.

Additionally, the SFA’s employees should be made aware of the penalties for violation of purchasing laws and ethics that may include criminal prosecution and loss of employment opportunities.

## General Ethical Standards

The following section provides a brief summary of common ethical standards that should govern the conduct of employees involved in the purchasing function.

### Personal Gain

It is unethical for any employee of a SFA to attempt to realize personal gain through performance of his/her duties.

### Influencing Public Employees

It is unethical for any employee of a SFA to attempt to influence any public employee to breach the standards of ethical conduct.

## **Employee and/or Family Member**

It is unethical for any employee of a SFA to participate directly or indirectly in purchasing when the employee knows, or has reason to believe that:

- The employee or any member of the employee's immediate family has a financial interest pertaining to the purchase;
- A business or organization in which the employee or any member of the employee's immediate family has a financial interest pertaining to the purchase; or
- Any other person, business, or organization with whom the employee or any member of the employee's immediate family is negotiating or has an arrangement concerning prospective employment is involved in the purchase. If an employee of the SFA has a financial interest in a purchase, that person shall abstain from discussion and decisions regarding the award of the purchase contract.

## **Relative Works for Vendor**

**Q-2** *The spouse of the food service director of a SFA operating a Child Nutrition Program (CNP) has recently accepted a position as an officer in a wholesale food distributing company. Should the company be disqualified as a bidder for future contracts with the SFA?*

**A** Not necessarily, but the SFA needs to be extra careful to document its entire food purchasing process. Vendor selection criteria should be as objective as possible, and the final selection should involve officials other than the food service director.

## **Gratuities**

It is unethical (and in some cases illegal) for a SFA's employee or former employee to solicit, demand, accept or agree to accept a gratuity or an offer of employment in connection with any decision, approval, disapproval, recommendation, or preparation of any part of a program requirement or purchase request, including influencing the content of any specification or purchase standard.

## **Kickbacks**

It is unethical for a contractor (or any person on behalf of a contractor) to make any payment, gratuity, or offer of employment as an inducement for the award of a contract.

## **Contract Clause**

The ban against gratuities and kickbacks should be clearly stated in every contract and solicitation.

## **Confidential Information**

It is unethical for any employee or former employee of a SFA to knowingly use confidential information for actual or anticipated personal gain or for the actual or anticipated gain of any person.

## Vendor Gifts and Relations

SFA officials and employees cannot accept anything of value from a vendor, such as personal gifts or gratuities, which may be considered to have been given to influence the purchasing process. Although such practices may be legitimate and generally accepted in the private sector, giving and receiving gifts in the public sector may constitute a violation of the law.

It is good practice for a SFA to consult with its attorney and/or other legal counsel at the State Ethics Commission or the Attorney General's Office to develop policies regulating the acceptance of vendor gifts. These policies should not only conform to applicable statutes but should also reflect the SFA's philosophy regarding regulation of the acceptance of the following from existing or prospective vendors:

- Trips (including transportation and hotel rooms),
- Meals,
- Tickets for entertainment, and/or
- Gifts of any value.

SFAs should also be aware of the disclosure requirements regarding federal conflict of interest regulations that prohibit an employee (and members of the employee's immediate family) who is involved in administering, directing, or authorizing federally-funded transactions from having a financial interest in a vendor associated with federally-funded transactions.

### Gifts from Vendors

**Q-3** *Several food companies like to give my office staff and managers Christmas gifts each year. Is there anything wrong with this?*

**A** Yes. This practice should be discontinued immediately as it is in conflict with federal purchasing regulations dealing with a code of conduct. Remember that neither you nor any of your employees should accept gratuities, favors, or anything of monetary value from companies with which you currently, or could potentially, do business.

## Incentives

Vendors often will make a special offer on a particular item. They might, for example, offer equipment or other prizes, or food products such as charbroiled beef patties at a much lower price that is below market value.

### When a Vendor Offers Incentives

The prices paid for all purchases should be based solely on the bid offered by the responsible vendor giving the SFA the best bid prices on items meeting specifications. When "incentives," such as prizes, equipment, etc. are offered and accepted:

- The "incentive" must in no way affect the decision to purchase and
- The "incentive" must become the property of the SFA and under no condition become the property of an individual.

Special offers often mean higher prices or lower quality or both. Frequently, special offers are offered on old merchandise that the vendor wants to liquidate.

A SFA may take advantage of “specials” under the following conditions:

#### **When a Vendor Offers an Item at a Lower Price than the Bid Price**

Once an item has been bid and the bid price accepted, the purchaser is not free to obtain additional bids or to purchase from anyone other than the vendor who has received the bid, unless:

1. The bid specified a quantity to be purchased;
2. The specified quantity will be purchased from the winning bidder; and
3. The amount to be purchased is in addition to the quantity bid.

Procedures for small purchases may be used in obtaining prices on the additional merchandise, unless the additional purchases will exceed \$100,000.

#### **When a Vendor Offers an Item Not Presently Used at a Special Price Below Market Value**

All purchases under competitive bidding must be based on specifications that clearly describe the item to be purchased. If you have tried a new food product and would like to purchase it, competitive sealed bids must be obtained if purchases will be \$100,000 or more. Small purchase procedures may be used if purchases will be less than \$100,000.

## **Code of Conduct**

Each SFA must have a Code of Conduct that covers all CNP and related personnel. The code or standard of conduct should include policies concerning conflicts of interest and prohibit school employees from soliciting or accepting gratuities, favors, or anything of monetary value from suppliers or potential suppliers. The Code of Conduct should also prescribe appropriate sanctions, penalties, or other disciplinary actions for violations by school personnel and/or suppliers. Specifically, at a minimum, the code of conduct should include the following:

- No employee of <insert name of district/SFA shall participate in the selection, award or administration of a contract when any of the following persons have a financial interest in the firm selected for the award:
  - The employee
  - Any member of his/her immediate family
  - His/her partner
  - An organization which employs, or is about to employ, any of the above
- School employees will neither solicit nor accept gratuities, favors or any item with monetary value from vendors, potential vendors, or parties to sub-agreements including:
  - Trips (including transportation and hotel rooms)
  - Meals
  - Tickets for entertainment
  - Gifts
  - Food
  - “Prizes” for students

Employees should be given guidance about how to respond when a gratuity, favor, or item with monetary value is offered. When there is doubt concerning the appropriateness of accepting gifts, favors, etc., the employee should consider the following questions:

1. How would the public perceive this action of receiving the gift, favor, etc.?
2. Will acceptance of the gift, favor, etc. possibly influence a future purchasing decision?

For a sample code of conduct that may be used or modified for use, see Form 13-A, Code of Conduct, provided at the end of this chapter.

### **Buying Items for Personal Use from Vendors**

**Q-4** *In my school system, it has been the practice for principals, teachers, school organizations and CNP staff to buy items from vendors at the bid price. Is this acceptable?*

**A** No. Federal regulations require a code of conduct which states that “the SFA’s officers, employees, or agents will neither solicit nor accept gratuities, favors or anything of monetary value from contractors, potential contractors, or parties to sub-agreements.” When a person purchases at the SFA’s bid price or any discounted price, that person is actually accepting from the vendor the cash difference between the bid or discount price and what one would have to pay for the item in the retail market. Even if the vendor were to charge the retail price, the person would still be receiving the convenience of a personal delivery and therefore would be accepting a favor from the vendor.

## Code of Conduct Form 13-A

The following Code of Conduct is expected of all persons who are engaged in the award and administration of contracts supported by school Child Nutrition Program funds.

No employee, officer or agent of <name of SFA/school district> shall participate in the selection or in the award or administration of a contract supported by program funds if a conflict of interest, real or apparent, would be involved.

Conflicts of interest arise when an employee:

- has a financial or other interest in the firm selected for the award;
- Is an employee, officer, or agent of the firm selected for the award;
- Has a member of the immediate family who is an employee, officer, or agent of the firm selected for the award;
- Has a financial interest in the firm selected for the award;
- Is about to be employed by the firm selected for the award; or
- Has an immediate family member who is about to be employed by the firm selected for the award.

To ensure objective contractor performance and eliminate unfair competitive advantage, however, a person that develops or drafts specifications, requirements, statements or work, invitations for bids, requests for proposals, contract terms and conditions or other documents for use by the Child Nutrition Program in conducting procurement shall be excluded from competing for such procurements. Such persons are ineligible for contract awards resulting from such procurements regardless of the procurement method used.

The <name of SFA/school district> employees, officers or agents shall neither solicit nor accept gratuities, favors, or anything of material monetary value from contractors, potential contractor, or parties to sub-agreements.

The purchase during the school day of any food or service from a contractor for individual use is prohibited.

The removal of any food, supplies, equipment or school property, such as official records, recipe books and the like is prohibited.

The outside sale of such items as used oil, empty cans and the like will be sold by contract between <name of SFA/school district> and the outside agency. Individual sales by any school person to an outside agency or other school person are prohibited.

Failure of any employee to abide by the above stated code could result in a fine, suspension, or both, or dismissal. Interpretation of the code will be given at any time by contacting the Superintendent at <Superintendent's phone number>. The <name of SFA/school district> will not be responsible for any other explanation or interpretation which anyone presumes to make.

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# Chapter 14

## Purchasing

All School Food Authorities (SFAs) and food service management companies must follow federal procurement requirements (as outlined in 7 CFR Parts 3016 and 3019) unless state or local laws are more restrictive and are consistent with federal regulations.

### Definition

Purchasing, or procurement, is defined as the process of acquiring goods or services by purchase, barter, exchange, or lease.

### Goals of Purchasing Regulations

Federal and state purchasing regulations are designed to help SFAs:

- Obtain the best products and services;
- Save money;
- Make the best use of federal, state and local funds;
- Provide open and free competition;
- Ensure fair and ethical practices.

### Allowable Purchasing Methods

Federal regulations allow four methods of purchasing;

- Small purchase procedures;
- Competitive sealed bids;
- Competitive negotiation; and
- Noncompetitive negotiation.

To determine the type of purchasing procedure to use, the SFA must evaluate the dollar value of the contract. The dollar amounts apply to all purchases from one source for one agreement/contract period.

- Small purchase procedures may be used for any purchase under \$150,000.
- Competitive sealed bids (also known as formal purchase procedures) must be used for procurements valued at \$150,000 or more.

Regardless of the method used, the SFA should avoid all provisions that might restrict competition or result in the SFA paying higher prices because only one or a limited number of vendors can supply the needed product or service.

The type of procuring instruments used (for example, fixed price contracts, cost reimbursable contracts, purchase orders, incentive contracts, etc.) shall be appropriate for the particular procurement and for promoting the best interest of the program. The “cost-plus-a-percentage-of-cost” and “cost-plus-a-percentage-of-income” method of contracting may not be used.

## **Small Purchase Procedures**

Procurement by small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies or other property that do not cost more than \$100,000. If small purchase procedures are used, price or rate quotations shall be obtained from an adequate number of qualified sources.

### **Steps for Small Purchase Procedures**

1. Let potential vendor know that you want to buy one or more items.
2. Give or tell them...
  - The product specifications
  - The period of time the bid must be honored (e.g. week, month, semester)
  - General purchasing conditions
  - Other information they may need.
3. Obtain price quotes from sales representatives...
  - Verbally either in person or by telephone.
  - Preferably In writing via fax, e-mail or standard mail using a price quote worksheet or catalog.
4. Document the prices quoted.
5. Award the bid to the vendor with the lowest price for the quality specified or document your reasons for selecting a higher bid. Document reasons for rejecting any or all bids.

## **Formal Bid/Competitive Sealed Bid Purchase Procedures**

A formal bid, or competitive sealed bid, is one option allowed for contracting for goods and/or services by federal regulations whenever the aggregate purchase amount exceeds \$150,000.

### **Steps for Using Formal Purchase Procedures**

1. Publically advertise the invitation for bids (IFB) or request for proposals (RFP).
2. Advertise for potential bidders and give them adequate time to respond.
3. In the IFB or RFP, include specifications, general and specific purchasing terms and conditions, length of contract, and instructions.
4. Open publically at time and place stated in the IFB or RFP with at least 2 SFA employees present.
5. Bids may not be accepted if not sealed or they arrive later than time stated for acceptance of bids.
6. Notify, in writing, the winner of the bid (the one with the lowest firm fixed-price that met all requirements). If award is made on basis other than lowest price, specifically document why the lowest price was not accepted. (e.g. quality, taste test, etc.)
7. Any or all bids may be rejected if they do not meet the terms of the IFB or RFP.

## **Purchasing Regulations**

### **Geographic Preference**

SFAs are prohibited from purchasing goods or services from a vendor based solely on their geographic location (7 CFR Part 3016.60). This regulation is known as “geographic preference.”

The **only** exception to this regulation is when purchasing **unprocessed** agricultural products. The Food, Conservation, and Energy Act of 2008 amended section 9(j) of the National School Lunch Act to allow and encourage institutions operating the Child Nutrition Programs to apply an optional geographic preference when purchasing unprocessed locally grown and locally raised agricultural products.

Geographic preference may **not** be applied to agricultural products that have significant value added components including those that have been:

- Cooked,
- Seasoned,
- Frozen,
- Canned or
- Combined with any other products.

The U.S. Department of Agriculture defines “unprocessed agricultural products” as agricultural products that retain their inherent character. Therefore, the geographical preference **may** be applied to agricultural products with minimal handling and preparation required to make the product useable including the following:

- Washed produce,
- Bagged produce,
- Chopped, cut, sliced, diced, or shucked products,
- Produce with minimal preservatives,
- Butchered livestock, fish, and poultry,
- Pasteurized milk (this is the only type of dairy product for which geographic preference may be used), and
- Eggs in a carton.

The effects of the following handling and preservation techniques shall not be considered as changing the agricultural product into a product of a different inherent character.

- Refrigeration, cooling, and freezing,
- Drying/dehydration,
- Application of high water pressure or “cold pasteurization”,
- Vacuum packing and bagging (such as placing vegetables in bags),
- Size adjustment through size reduction made by peeling.

### **Contracting with Small and Minority Firms**

Positive efforts shall be made by each SFA to utilize small business and minority-owned business sources of supplies and services. Such efforts should allow these sources the maximum feasible opportunity to compete for procurements to be performed with program funds.

### **Contract Content**

Contracts shall be made by SFAs only with responsible suppliers who possess the potential ability to perform successfully under the terms and conditions of a proposed procurement. Consideration shall be given to such matters as contractor integrity, record of past performance, financial and technical resources and accessibility to other necessary resources.

In addition to provisions to define a sound and complete agreement, the SFA shall include the following requirements in all contracts which it awards when the contract costs are to be borne by program funds:

## Buy American Provision

Section 104(d) of the Child Nutrition Reauthorization Act of 1998 requires SFAs in the contiguous U.S. to purchase to the maximum extent practical, domestic commodities or products. The legislation defines “domestic commodity or product” as one that is processed in the U.S. substantially using agricultural commodities that are produced in the U.S. The term “substantially” in this context means that over 51 percent of the final processed product consists of agricultural commodities that were grown domestically.

The Buy American Provision should be included in bid specifications to ensure compliance and applies to all funds in the food service account and not just to federal reimbursement.

Actions that districts/SFAs can take to comply with the Buy American requirements are:

- Including a Buy American clause in all procurement documents (product specifications, bid solicitations, requests for proposals, purchase orders, etc.);
- Monitoring contractor performance;
- Requiring suppliers to certify the origin of the product;
- Examining product packaging for identification of the country of origin; and
- Asking the supplier for specific information about the percentage of U.S. content in the food product.

## Buy American

**Q-1** *Are there any exceptions to the requirements of the Buy American provision?*

**A** Yes. While rare, two situations which may warrant a waiver to permit purchases of foreign food products include: 1) the product is not produced or manufactured in the U.S. in sufficient and reasonable available quantities of a satisfactory quality; and 2) competitive bids reveal the cost of a U.S. product is significantly higher than the foreign product.



**Q2** *Does the Buy American provision apply to entities that purchase on behalf of the SFA, such as a purchasing cooperative or a food service management company?*

**A** Yes. Any entity that purchases food or food products on behalf of the SFA must follow the same “Buy American” provisions that the SFA is required to follow.

## Debarment and Suspension

Debarment and suspension actions have received a lot of attention in the past as a result of federal and state investigations in companies involved in bid rigging on contracts. A SFA is prohibited from contracting with a company or individual that has been debarred or suspended. This prohibition does not extend to contracts in existence at the time of the debarment/suspension or to most contracts under \$150,000. Rather, it applies to new contracts and extension or renewals of existing contracts of \$150,000 or more and to contracts for audit

services, regardless of amount. Furthermore, the prohibition does not apply to proposed debarments.

While a SFA is prohibited from contracting with a company or individual that has been debarred or suspended, a debarment, suspension, or proposed debarment action does not exclude a company or individual from fulfilling existing contracts involving federal non-procurement programs.

To ensure that the SFA does not enter into a contract with a debarred or suspended company or individual, each SFA must require that each responsive include a certification statement with each bid on each covered contract. The following certification statement is required in all contracts: "By submitting an offer, offeror certifies, to the best of its knowledge and belief, that the offer and/or any of its Principals are not presently debarred, suspended, proposed for debarment, or declared ineligible for the award of contracts by any Federal agency or department". By including the certification statement, the bidder certifies that neither it nor any of its principals (for example, key employees) has been proposed for debarment, debarred, or suspended by a federal agency. Where the bidder is unable to certify to any of the statements in this certification, the bidder shall attach an explanation to the bid.

## Helpful Purchasing Definitions

**Code of Conduct** – Standards of conduct that shall govern the performance of the SFA's officers, employees, or agents in contracting for payment or expending program funds. (See Form 13-A in Chapter 13 – Ethics for a sample Code of Conduct.)

**Competitive Sealed Bids** – One procurement option, commonly called formal bid procedure that is allowed by state and federal regulations whenever the aggregate purchase amount exceeds \$150,000.

**Competitive Sealed Proposals** – The competitive sealed proposal process is an alternative to competitive bidding. The terms and conditions of competitive sealed proposals are identical to those for competitive bidding except for the important difference relating to the finality of initial offers. Under competitive sealed proposals, changes in the nature of a proposal and in prices may be negotiated after proposals are opened. The competitive sealed proposal process provides for full competition among proposals and allows for negotiation with the proposer(s) to obtain the best services at the best price.

**Contract** - A legally enforceable agreement between two (or more) parties where each promises to do (or not to do) something. A contract is also the written document containing such an agreement.

**Formal Bid** – Common name for the purchase method of using competitive sealed bids. A formal bid, or competitive sealed bid, is one option allowed for contracting for goods and/or services by federal regulations whenever the aggregate purchase amount exceeds \$150,000.

**Request for Proposals** – A Request for Proposal (RFP) is a part of the competitive sealed proposal process. The RFP is the mechanism that generates the receipt of competitive sealed proposals. A RFP may also be used as a procurement option to generate a non-sealed competitive proposal. In this instance, a SFA may open the proposal upon receipt and begin the negotiation process for the offered goods/services.

**Sole Source** – Sole source means there is only one source of the item and accordingly, no price competition.

**Specification** – A clear and simple description of an item or service that is identifiable with the current market, is capable of being checked, is fair and protective, and allows for maximum competition in purchasing. The use of clear specifications is required with any method of purchasing.

**Standards of Identity** – Food standards that are regulated by the Food and Drug Administration which describe the nature and character of a given term and specify the kinds and amounts of ingredients that must go into a product. The standard of identity for a specific food tells what is in it, how it is made, how the product looks and sets limits, such as fat and moisture content.

**Terms and Conditions** – Specific requirements that are binding upon the vendor awarded the contract and communicate the district's expectations in regard to the vendor's performance in connection with the district's purchase. Examples of food service specific terms and conditions might include inspections of wholesomeness, conditions of delivery, requirements for packaging and provisions for making substitutions when necessary.

## **Additional Information**

For additional information regarding specific procurement regulations and procedures, please refer to the:

- Code of Federal Regulations (7 CFR Parts 3016 and 3019) and 7 CFR 210.21;
- South Carolina Consolidated Procurement Code; and the
- Local SFA procurement code as applicable.

Training and technical assistance with procurement issues is available from the Office of Nutrition Programs, South Carolina Department of Education (SCDE) at (803) 734-8188.

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# Chapter 15 - Food Service Management Companies

School Food Authorities (SFAs) considering contracting for food service with a private “for profit” food service management company (FSMC) are required to contact the Office of Nutrition Programs, South Carolina Department of Education (SCDE) before initiating the bidding process (i.e. before posting a public notice for bids or proposals). SCDE will then provide information explaining the regulations and responsibilities. Federal and state requirements for the contract must be followed.

## Additional Information

- Q-1** *How can I learn more about the specific regulations and procedures for contracting food service operations with a private food service management company?*
- A** Ask SCDE for a copy of the U.S. Department of Agriculture’s publication entitled, “*Contracting with Food Service Management Companies; Guidance for SFAs.*”

## Considerations in Deciding Whether to Contract for Food Service Management

When deciding whether contracting with a private company will provide the best possible food service operation, the SFA should consider all financial, administrative, and operational issues. The SFA should allow enough time to properly analyze and answer all issues. This process should ideally begin one year prior to the start of the contract with a private company. Here is a brief look at some of the issues that should be thoroughly analyzed before a decision is made.

### Management

The knowledge, skills and experience of the food service director are some of the best indicators of program success. One of the main benefits offered by a FSMC is professional management. However, a SFA can also hire its own highly effective professional management.

Carefully consider the management concerns that have caused the SFA to consider using a FSMC. Does the SFA currently employ a qualified director? If so, has the food service director had the opportunity to address these concerns and present a management plan to solve the problems? If the SFA does not currently employ a qualified director, could one be employed? If the SFA is too small to employ a full-time director, could a director be shared with another SFA?

If a FSMC is used, will the SFA be able to interview the FSMC director/manager before an assignment is made? If the assigned director/manager is unacceptable, what opportunities will the SFA have for replacement? How much supervision from the parent company will be provided for local FSMC staff?

### Quality

Student participation is one of the best indicators of program quality. If participation is low or declining, it may be an indicator of customer dissatisfaction with one or more aspects of the program. What student, parent and teacher involvement is there with the current program? Have students, parents and teachers

been involved in selecting new food items and recipes, planning menus and evaluating meal acceptability, food quality and variety? Have their suggestions and ideas been used? What promotional and marketing tools have been used to attract customers? Is the food service environment pleasant for students and teachers? Do students have adequate time to enjoy eating their meals?

### **Costs**

There are many tools that a local SFA can use to control its food service costs and operate within its budget. For example, purchasing practices can be made more competitive and cost effective. Better scheduling of employees can often save money. While a FSMC may be able to reduce costs in some areas, the SFA will be paying the company a fee to do so. Will the SFA be better off investing money in the FSMC or in the SFA's operation? It is also important to evaluate the long-term costs of doing business with a FSMC. Contracting may be more cost effective in the short-term, but could be more costly in the long run.

### **On-Site Visits**

Prior to selecting a FSMC, the SFA's personnel are strongly encouraged to visit one or more school sites managed by each of the FSMCs under consideration. It is important to observe the operation on a typical day. Therefore, these visits should be unannounced to the food service site manager. Evaluate the sanitation, staffing, food production, food quality and student acceptability. Compare these to the current practices in the SFA's food service program. If the FSMC operation is judged to be superior, what were the noticeable differences? What would it take to make similar changes in the SFA's current program?

SCDE can help with the decision-making process by providing assistance in evaluating the SFA's options. Contact the Office of Nutrition Programs, SCDE for further information regarding contracting with the FSMC.

## **Process to Procure & Contract for FSMC Services**

Any SFA that contracts with a FSMC must adhere to procurement standards specified in the National School Lunch Program regulations with the procurement procedures established by SCDE. Following are the steps for procuring and contracting for FSMC services.

1. At least six months prior to the date for beginning the contract (January 1 or earlier), the SFA should request from SCDE all procedures and documents for contracting with a FSMC. This information includes:
  - *Contracting with Food Service Management Companies: Guidance for School Food Authorities;* and
  - SCDE's Request for Proposal (RFP) or Invitation for Bid (IFB) template (which includes a list of prospective bidders).

The initial term of the contract must be for one year and shall begin on July 1 and end on June 30. However, conditions to extend the contract for four additional one-year periods may be included in the proposal.

2. The SFA must decide whether to use the RFP or IFB method to contract for food service. The RFP method can be used with two types of contract methods. The SFA must then decide whether to use a Maximum Allowable Cost or a Firm Fixed Price. The SFA is required to use the RFP or IFB templates established by SCDE with FSMCs. The SFA should contact SCDE to receive current copies of the RFP/IFB templates. The SFA should allow four to six months to adequately develop and establish a RFP or IFB.

3. The SFA must complete SCDE's RFP or IFB template and mail it to SCDE for approval prior to the initial advertisement to seek proposals/bids for food services.
4. Once SCDE has approved the RFP or IFB, the SFA must advertise the proposal/bid. A list of names and addresses of prospective respondents/bidders is included in the template.
5. The SFA shall conduct a Pre-proposal/Pre-bid Conference for all interested bidders two weeks or more after posting the advertisement but before proposals/bids are due. All potential respondents/bidders must be invited to the Pre-proposal/Pre-bid Conference. All questions asked by attendees at the Pre-proposal/Pre-bid Conference must be responded to in writing by the SFA with copies provided to all attending respondents/bidders and to SCDE.
6. The SFA should allow a minimum of 60 days between the advertisement of the proposal/bid and the due date for proposals/bids.
7. The SFA will establish a committee to evaluate the RFP/IFB. The committee may be comprised of principals, teachers, parents, administrators, and board members or other individuals agreed upon by the committee. Due to the complexity of the process, students should not serve as a committee member. An official from SCDE must be a member of the committee. However, the SCDE official will not participate as a voting member of the committee.
8. The SFA will prepare the agreement between the SFA and the FSMC selected using the template documents provided by SCDE. Any changes or additions to the agreement must be in the form of an addendum to the agreement.
9. The SFA must resubmit the prepared agreement to SCDE for final review and approval prior to implementation. Allow a minimum of two weeks for approval. Submit all of the following to SCDE:
  - A signed copy of the contract between the SFA and the FSMC;
  - A copy of the Performance Bond;
  - A copy of the Insurance Certificate naming the SFA as the certificate holder;
  - A signed copy of the Contract Agreement Renewal Form (if applicable).
10. Once the RFP/IFB with any attached addendums has been approved by SCDE and has been signed by all parties, it becomes the final contract between the SFA and the FSMC.
11. The SFA will be notified in writing by SCDE when the contract has been approved. The contract must be signed by the SFA and FSMC by July 1.

## Overview of FSMC Procurement Timetable

Table 15.1 – Timetable for Procuring a FSMC provides a brief overview of the steps required to procure a FSMC and when each step should be taken.

**Table 15.1 - Timetable for Procuring a FSMC**

Day	Month	Description of Activity
1	January	SFA considers having a FSMC operate their Child Nutrition Program (CNP) and requests technical assistance from SCDE. SCDE and SFA review template RFP/contract and negotiate modifications as needed.
30	Early February	SCDE approves SFA's completed/modified RFP/contract
45	Mid February	SFA advertises RFP/contract in major state publications for the first time.
52	Late February	SFA advertises RFP/contract in major state publications for the second time.
60	Early March	SFA holds a Pre-proposal/Pre-bid Conference at least two weeks after first advertisement. Representatives from each FSMC submitting proposals/bids are required to attend.
61-81	March	FSMC representatives visit schools. SFA provides tours of facilities to all potential contractors at the same time, if possible.
95	Mid April	All addenda/amendments received by FSMC. FSMCs submit proposals to SFA.
105	Late April	Proposals/bids are opened with one or more witnesses. (Indicate date, time and place of opening.) Representatives from FSMCs are not required to attend.
110–135	May	SFA analyzes proposals/bids based on the RFP/IFB criteria. Top FSMC candidates are invited to give formal presentation to Evaluation Committee. Following presentations, committee makes written, objective evaluation and recommendation to SFA administrators. Proposal/contract reviewed by SFA's attorney; attorney reviews and provides written approval.
136	Late May	Draft of all <b>final</b> contract data/materials, debarment/suspension certification proposal analyses and all evaluation records submitted to SCDE for review.
166	Late June	SFA submits final RFP/contract to SCDE for approval. (The approved RFP becomes the contract.)
170	Late June	SCDE notifies the FSMC of approval of the contract.
175	July 1	Official award and contract signing. (A copy of the entire approved document (RFP), agreement authorization with official signatures, and copy of school board approval minutes must be provided to SCDE immediately after contract signing.)
205	Early August	Training of SFA CNP personnel provided by FSMC.
213*	Mid August	First meal service.

\* From the day the RFP is mailed, a minimum of six months is required before the first day of meal service.

## Procedures for Renewal of a FSMC Contract

SFAs have the option to renew the contract annually for an additional four years beyond the original contract year. If the SFA uses the option to renew the contract, remember the following:

1. SCDE will send the SFA written notification that the existing contract may be renewed for one additional year. SCDE will also notify the SFA of the maximum amount of increase allowed in the contract based on the *Food Away from Home Series* of the *Consumer Price Index* from March to March.
2. The SFA and the FSMC must negotiate the renewal terms of the contract and any amendments to the contract. The term of any contract renewal must run from July 1 to June 30.
3. The SFA must send SCDE the following documents for approval:
  - A letter stating the intent of the SFA to renew the contract with the FSMC for the upcoming school year. (Note: the SFA and the FSMC must be named in the letter and the July 1 to June 30 date must be clearly stated.);
  - A copy of any amendments, subcontracts, letter of agreement, or other relevant documentation pertaining to the contract which have not previously been furnished to SCDE;
  - An amendment list of schools served, if the SFA has added/deleted schools/centers to/from the contract;
  - Documentation through cost or price analysis supporting a request for an increase in the per meal charge by the FSMC.
  - Copies of the Performance Bond or Performance Bond Continuation and Insurance Certificates.
4. The renewal package must be approved by SCDE prior to July 1. The SFA will be notified in writing when the contract renewal has been approved (or denied).
5. If the contract is still in effect during its fifth year, a new contract must be procured for the coming school year if the SFA wishes to continue contracting with a FSMC.

## SFA's Monitoring Requirements

Regulations require that the SFA retain control of the quality, extent and general nature of the food service operation. This requires that the SFA exercise financial and operational oversight by monitoring the FSMC and the execution of the contract. The SFA shall supervise and monitor the CNP to ensure compliance with all applicable rules and regulations of SCDE and USDA.

The SFA must conduct periodic on-site visits at each school served by a FSMC. Documentation of all monitoring, any corrective actions required, and whether or not corrective action was taken must be maintained for three years. Form 15-A, Food Service Management Company (FSMC) Monitoring Form, provided at the end of this chapter must be used to conduct and document each on-site visit. At least one visit at each site must be completed and documented prior to February 1 each year.

At a minimum, the SFA should monitor the program to evaluate the following:

- **Cycle Menu** – The FSMC has followed the cycle menu and any and all deviations allowed under the contract for the first 21 days of operation.
- **Meal Pattern** – Following the first 21 days, the menu meets the meal pattern requirements specified in the contract and in USDA regulations (7 CFR Parts 210 and/or 220).
- **Production Records** – Production records are completed each day for all reimbursable meals.
- **Offer Versus Serve** – The FSMC complies with Offer versus Serve requirements.
- **Foods of Minimal Nutritional Value** – Regulations are followed concerning the sale of competitive foods and foods of minimal nutritional value.
- **Food Quality** – Food quality specification standards meet those described in the contract.
- **Civil Rights** – FSMC complies with civil rights requirements, including referring any civil rights complaints to the SFA.
- **Free and Reduced-Price Policy** – FSMC adheres to the SFA’s approved free and reduced-price meal policy statement.
- **Monitoring of Meals** – Meals are monitored after last food item or menu item is served/selected to ensure that only reimbursable meals are claimed.
- **Meal Count Records** – Daily meal count records accurately reflect the counts of student and adult meals by meal type and eligibility category.
- **Claim Documentation** – Adequate records are maintained, by school, to support the Claim for Reimbursement (meal/milk counts and any other data on the claim for which the FSMC is responsible).
- **Revenue Records** – Revenue records accurately reflect the revenue received and are broken down by source, type, and category of meal or food service (e.g. a la carte sales, reduced-price and full price, NSLP and SBP meals, vending machine sales, etc.)
- **Cost Records** – Cost records are maintained, including source documentation supporting charges for contractually approved costs for cost based contracts, e.g. time and attendance records for staff hours charged.
- **Cost Reimbursement Contracts** – For Cost Reimbursement Contracts, the following must be audited:
  - Food and non-food invoices to ensure that invoices reflect actual expenses.
  - Time reporting forms to ensure only hours worked are billed to the SFA.
  - Bills submitted by the FSMC to ensure that only eligible direct costs (as defined in the contract) are included.
  - Food, labor, and other large expense items – Audit large expense categories quarterly and perform random audits on smaller expense categories.
  - Rebates Bonuses, and other Financial Benefits: Ensure all rebates, bonuses, discounts or other financial benefits derived from the procurement process must accrue to the SFA’s nonprofit school food service account as defined in 7CFR 210.21(f).
- **Bills** – All bills are monitored prior to payment to ensure that the FSMC has not double-billed or included costs that are not allowed by the contract.

- **USDA Donated Foods** – The amount and kind of donated food offered versus accepted is documented to determine if the FSMC is accepting USDA donated foods to the maximum extent possible, in quantities that can be used and stored without waste. In addition, determine if the donated food is being utilized to the maximum extent possible by the FSMC.
- **Advisory Board** – Examine records to ensure that an advisory board consisting of parents, teachers and students (at a minimum as required by USDA regulations 7 CFR 210.16) exists and meets regularly to assist with menu planning.
- **Student and Parent Involvement** – Determine what activities occur and how they are documented.
- **Sanitation and Safety Standards** – Ensure that all facilities and equipment used to prepare and serve meals are adequately maintained for safety and sanitation, that employees practice safe food handling procedures, and that Department of Health and Environmental Control (DHEC) licenses for all facilities are current. Observe the most recent health inspection reports, ensure they are posted in a publicly visible location and note any areas cited as critical.
- **Corrections** – Ensure that any corrections have been made as required if problems were noted during previous monitoring visits.
- **Overall Compliance** – Ensure that the FSMC complies with all policies established by the SFA, SCDE and USDA and carries out all responsibilities as outlined in the contract between the SFA and the FSMC.

## **Record Keeping Responsibilities**

The SFA must maintain all documentation directly related to the:

- solicitation,
- award,
- extension, or
- implementation

of any given contract. USDA regulations (7 CFR 210.23-c) require that these records be maintained for a period of three years plus the current operating year.

## **FSMC Contracts**

USDA has reviewed several contracts between SFAs and FSMCs to ensure compliance with federal regulations. Before entering into a contract with a FSMC, SFAs should be aware of and consider the following issues:

- **Accounting Practices** – Any accounting period referenced in a contract between a SFA and a FSMC must be defined and utilized in a way that will provide monthly and yearly fiscal integrity for claims submitted to SCDE. A clear audit trail must be maintained with supporting documentation between the FSMC billings and the expenditure of child nutrition program/school food service account funds. It is the responsibility of the SFA to ensure that the accounting system used by the FSMC is adequate and that adequate cost data is provided. Any billings from the FSMC to the SFA, which are categorical sums representing fees for services, expenses, or products, must be accompanied by specified supporting documentation representing actual costs of the items in each category. Original invoices for expenses must be compared to amounts billed by the FSMC in all instances. Language designating these responsibilities should be included in all contracts.

- **Amortization of Expense** – Amortization of expenses can occur only for the one-year period of the contract. Interest charges placed on amortized expenses are prohibited. Amortization of expenses for longer than one year would be beyond the scope of the contract and are not allowed. All non-expendable equipment (>\$5,000) shall be purchased by the SFA.
- **Breach of Contract** – Any RFP/IFB must indicate nonperformance violations and specified sanctions defining breach of contract terms by the FSMC. The violations defined and the sanctions specified must also be included in the contract. These sanctions must be addressed in accordance with federal and state procurement provisions.
- **Commodity Utilization** – The contract must state that donated commodities will be “fully utilized in the SFA’s nonprofit CNP.” The federal reimbursement rates and commodity values included in the contract must be current for the school year to which the contract pertains. FSMC must credit the SFA for the full dollar amount of commodities received and stored at the warehouse at the end of each one bid year.
- **Damages** – Any provisions that require the SFA to pay the FSMC damages for any FSMC employees hired by the SFA are prohibited by federal law which restricts indemnification.
- **Health Certification** – All contracts must require the SFA to maintain applicable health certification and ensure that all state and local regulations are met by the FSMC personnel preparing and serving meals at the school facility.
- **Insurance** – Requirements for excessive liability insurance certification for non-FSMC-approved vendors are unwarranted and restrict competition. Requirements that the insurance certificate survive the termination of the contract are beyond the scope of the agreement. These requirements could be used to limit open and free competition by serving as a barrier to entry into the public bidding process for smaller businesses and for newly created businesses. All procurement transactions must be conducted in a manner that provides maximum open and free competition.
- **Meal Equivalent Rate** – The meal equivalent rate is the adult lunch charge as established yearly by SCDE. The adult lunch charge is based on the free meal reimbursement rate, plus the per meal value of commodities, plus state sales tax.
- **Oversight** – Regulations require that the SFA retain control of the quality, extent, and general nature of its food service and the prices to be charged for meals. This requires the SFA to exercise financial and operational oversight by monitoring the FSMC and the execution of the contract.
- **Percentage Assessments** – Percentage assessments against total goods purchased or sold and labor or salaries are not allowed. These charges constitute cost-plus-percentage-of-cost income assessments that are prohibited. Salaries and benefits are an allowable cost but must be expressed as actual costs rather than a cost-plus-percentage-of-cost. Any charges for procurement of goods naming the FSMC as procurement agent are prohibited.
- **Product Identifications** – The contract between the SFA and the FSMC must require the FSMC to furnish detailed identifications for each food component included in the RFP/IFB. Identifications must include items such as grade, purchase units, style, condition, weight, ingredients, formulations, and delivery time.

- **Rebates** - The FSMC purchases and pays for food and supplies for the SFA under a maximum allowable cost contract. The SFA then reimburses the FSMC for the food and supplies purchased. USDA has determined that all rebates accrued by the FSMC for food and supplies in the form of cash discounts, label allowances, group allowances, promotion allowances, “bill-backs,” or other rebates purchased for the SFA must accrue to the SFA. In addition, all non-profit organization allowances must also accrue to the SFA.
- **Return to District** - Contracts that provide for FSMC guarantees, returns, or payments of funds back to the SFA’s general fund are not allowed. While federally assisted programs should bear their fair share of cost, there is no provision for profit or other increments above the costs in these programs. Any revenues received from the school food service operation must accrue to the benefit of the nonprofit school food service account and be used only for the operation or improvement of such food service.

### **Purchasing Equipment**

**Q-2**     *Can the FSMC bill the SFA for large equipment purchased for use in the school food service operation?*

**A**        No. Regulations state that all non-expendable equipment (per unit price of \$4,999.00 or more) shall be purchased by the SFA.

## Food Service Management Company (FSMC) Monitoring Form 15-A

**Instructions:** A School Food Authority (SFA) official must conduct a monitoring visit of each food service site, using this form, by February 1 each year. Additional visits should be conducted as needed.

SFA: \_\_\_\_\_ FSMC: \_\_\_\_\_

Review Date: \_\_\_\_\_ Name of Site Monitored: \_\_\_\_\_

<b>Menus and Service</b>		<b>Yes</b>	<b>No/Needs Improvement</b>
1.	Are the foods purchased monitored to ensure compliance with specifications (identifications) submitted with contract?	<input type="checkbox"/>	<input type="checkbox"/>
2.	Does the food used in meal preparation, in terms of quality and condition, appear to meet the detailed procurement specifications (identifications) of the contract?	<input type="checkbox"/>	<input type="checkbox"/>
3.	Are menus planned by the FSMC reimbursable and is a daily nutritional analysis available? (Obtain copies of the FSMC menus and nutritional analysis.)	<input type="checkbox"/>	<input type="checkbox"/>
4.	Are production records completed each day for all meals claimed for reimbursement?	<input type="checkbox"/>	<input type="checkbox"/>
5.	Are reimbursable meals clearly identifiable at the school on the day of the visit?	<input type="checkbox"/>	<input type="checkbox"/>
6.	Does the quality of the food prepared and served appear to be acceptable?	<input type="checkbox"/>	<input type="checkbox"/>
7.	Are daily meal choices available to all students throughout the serving period?	<input type="checkbox"/>	<input type="checkbox"/>
8.	Are the prices charged to students those established by appropriate SFA officials and approved by SCDE?	<input type="checkbox"/>	<input type="checkbox"/>
9.	If a la carte items are sold to students, the amount charged is that approved by the SFA. The number of sales and monies collected is being recorded appropriately.	<input type="checkbox"/>	<input type="checkbox"/>
10.	Are the regulations followed concerning not selling restricted foods of minimal nutritional value (carbonated beverages, certain candies, water ices and chewing gum) in the food service areas during meal service periods?	<input type="checkbox"/>	<input type="checkbox"/>
11.	Is a current benefits issuance (master list) roster available at the point of service?	<input type="checkbox"/>	<input type="checkbox"/>
12.	Are applications (approvals) and verification procedures completed by a principal or an acceptable designated representative?	<input type="checkbox"/>	<input type="checkbox"/>
13.	Do meals appear to be correctly counted at the point of service (i.e. after the last food or menu item is served/selected) and recorded by eligibility category?	<input type="checkbox"/>	<input type="checkbox"/>
14.	If second meals are purchased by students, are they claimed as non-program meals (not claimed as reimbursable meals) and collected for accordingly.	<input type="checkbox"/>	<input type="checkbox"/>

<b>Financial Accountability Procedures</b>		<b>Yes</b>	<b>No/Needs Improvement</b>
15.	Are claim reviews (edit checks) properly completed as prescribed by the SFA?	<input type="checkbox"/>	<input type="checkbox"/>
16.	Are the daily records of meal participation and income checked by someone else?	<input type="checkbox"/>	<input type="checkbox"/>
17.	Are receipts verified by 2 people daily and supported by validated bank deposit slips?	<input type="checkbox"/>	<input type="checkbox"/>
18.	Are records available to support claims for reimbursement?	<input type="checkbox"/>	<input type="checkbox"/>
19.	Does the SFA monitor bills submitted by the FSMC for payment for accuracy?	<input type="checkbox"/>	<input type="checkbox"/>
<b>Sanitation and Safety Procedures</b>		<b>Yes</b>	<b>No/Needs Improvement</b>
20.	Are facilities and equipment adequately maintained for safety and sanitation?	<input type="checkbox"/>	<input type="checkbox"/>
21.	Do employees practice safe food handling procedures?	<input type="checkbox"/>	<input type="checkbox"/>
22.	Is garbage and trash placed in appropriate containers and placed in the area designated by the SFA for later removal?	<input type="checkbox"/>	<input type="checkbox"/>
23.	Are DHEC health licenses maintained as required by the contract? Date of latest DHEC inspection: _____ Numerical Score: _____ Any areas cited as critical: _____	<input type="checkbox"/>	<input type="checkbox"/>
<b>Other Contractual Requirements</b>		<b>Yes</b>	<b>No/Needs Improvement</b>
24.	Are all commodity foods received and made available to the FSMC used to the maximum extent possible and used only in the SFA's nonprofit Child Nutrition Programs?	<input type="checkbox"/>	<input type="checkbox"/>
25.	Are annual physical inventories of commodity foods received submitted to SCDE?	<input type="checkbox"/>	<input type="checkbox"/>
26.	Are food rebates reported accurately to the SFA?	<input type="checkbox"/>	<input type="checkbox"/>
27.	Does the FSMC provide meal service to other programs/students/adults at this site?	<input type="checkbox"/>	<input type="checkbox"/>
28.	If yes to the above, does the contracting/handling/costing of such meal service appear to be acceptable? (That is, no school food service funds/food/labor/supplies, etc. are used and a separate contract is used for all such meals.)	<input type="checkbox"/>	<input type="checkbox"/>
29.	Does the advisory board, consisting of parents, teachers and students, meet on a regular basis to assist in menu planning? (Obtain a list of members and meeting minutes. Evaluate frequency of meetings and the contribution made by the board.)	<input type="checkbox"/>	<input type="checkbox"/>
30.	Are student and parent involvement activities adequate and documented?	<input type="checkbox"/>	<input type="checkbox"/>
31.	Are records available for three years plus the current year?	<input type="checkbox"/>	<input type="checkbox"/>

List of Corrective Actions taken for all “No/Needs Improvement” items.	Date of Implementation

**Other Comments:**

\_\_\_\_\_  
Signature of SFA’s Monitoring Official

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of FSMC Official

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributors: Janice Oates and Keith Ringer  
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# Chapter 16 – Administrative Review (AR)

The Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger-Free Kids Act of 2010 (HHFKA), instructed the U. S. Department of Agriculture (USDA) to develop a unified accountability systems designed to ensure that participating school food authorities (SFAs) comply with the National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. Reviews conducted by the South Carolina Department of Education (SCDE) are based on USDA regulations (7-CFR-210.18) and updated policy guidance effective July 1, 2013.

## Goals of AR

The AR is designed to measure **minimum** compliance with federal and state administrative program requirements to determine whether:

- Free and reduced-price meal benefits are properly provided;
- Accurate meal counts are taken at the point of service;
- Complete, reimbursable meals are being offered;
- Food safety plan guidelines are being followed; and
- Wellness policies and state K-5 nutrition standards are being followed.

## Frequency of ARs

Q-1 *How often will an AR be conducted?*

A An AR will be conducted at least once every three years.

## The Review Process

### Selection of Review Sites

ARs are conducted by SCDE in all school districts, residential child care institutions, and private and parochial schools that participate in the National School Lunch Program at least once every three years. The review schedule is available to the public. Approximately 50-60 ARs are conducted by SCDE staff each school year. Generally, ARs are conducted at the same school food authority (SFA) in the same school year. For districts, the number of review sites is based on the number of schools. Specific schools are then selected based on USDA free participation criteria. If no schools meet the USDA criteria, SCDE may use other selection criteria.

### Review Period

The review period for the AR and follow-up reviews must cover the most recent month for which a claim for reimbursement was submitted, provided that the claim for reimbursement covers at least 10 operating days.

### Pre-Visit Procedures and the Off-Site Assessment

The first step in the Administrative Review Process is to contact the SFA's superintendent and food service director and send a confirmation/introductory letter. The letter must advise the SFA of the upcoming review.

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Next, the State Agency (SA) should complete the *Off-Site Assessment Tool* with the food service staff prior to the on-site portion of the Administrative Review. The data collected must be current during the year of the scheduled review and reflective of the current school year.

### Entrance Conference

An entrance conference of the AR should be conducted by the SA Reviewer with the SFA staff (e.g., Food Service Director, Business Manager, and Superintendent). The SA Reviewer should discuss the results of the *Off-site Assessment Tool*, explain review areas to be covered, and inform the SFA which schools it will review.

### During the On-Site Review

The AR reviewer(s) will check the records at the SFA's main office and will also check paperwork and observe practices at each site to be reviewed. For a list of records they will review, refer to the "[Resources and Documentation Required](#)" section provided in this chapter.

The AR reviewer must complete all modules of the *On-Site Assessment Tool* in order to fully evaluate the SFA's compliance with all program requirements. This includes an examination of:

- The SFA's free and reduced-price certification
- The meal service – to ensure the school(s) and SFA procedures yield accurate meal counts and claims for reimbursement, and to ensure the school's meal service complies with requirements
- The General Areas – to ensure all other program areas comply with program requirements

### The Exit Conference

An exit conference must be conducted at the conclusion of the on-site portion of the AR. The purpose of the exit conference is to notify SFA staff of any program findings, extend of the findings, and the establishment of an agreed-upon Corrective Action Plan to correct the findings within a timeframe. An Administrative Review Report will be sent to document compliance, highlight the SFA's strengths, and outline areas in need of improvement. In the spirit of continuous improvement, SCDE may offer recommendations on ways to redesign a particular process and/or enhance the quality of meals to increase overall participation and operational efficiency.

### Review Findings and Follow-up Reviews

Financial adjustments will be calculated for errors, omissions, and/or discrepancies in paperwork and/or critical procedures including the following:

- **All meal application approval errors.** In addition, if an application is approved correctly but incorrect benefits are being claimed, fiscal action may be necessary.
- **Meal counting and claiming errors.** This includes meal count consolidation errors and meal claim errors.
- **Menu errors.**

Corrective action may be required for additional findings. In serious cases, a corrective action and technical assistance plan may include a follow-up review.

### A Review of the Reviews

All AR files undergo a peer review to ensure that all information is accurate and appropriate follow-up action has been accomplished. Performance data from all ARs is then consolidated in

## Chapter 16 – Administrative Review (AR)

an annual statewide data report for submission to USDA. All AR documentation is subject to review during a state-level USDA Management Evaluation.

**Table 16.1 - The Timeline**

Point in Process	Description of Action
Beginning of Each School Year	SCDE establishes a tentative review schedule based on a 3-year statewide review cycle.
4-6 Weeks Before Review	SCDE will work with the Child Nutrition Director (CNP) to complete the <i>Off-site Assessment Tool</i> . SCDE will confirm dates with CNP Director. A notification letter is then sent to superintendent with review dates, review month, and number of review sites.
Actual Review	Reviewers hold entrance conference with superintendent (or designee) and CNP director. Reviewers spend approximately one day per review site, including review of district/main office paperwork. An exit conference is held with superintendent (or designee) and CNP director.
Final Report	A final report is issued by SCDE approximately 30-60 days after review
Appeal Process	SFAs may appeal adverse administrative and/or fiscal action after receipt (via Certified Mail) of the final report.

a The actual time may vary based on the number of reviewers, number of sites reviewed, geographical proximity of schools to the district/main office, number and length of lunch periods, and number of applications.

b If adverse findings are identified, confirmation of corrective action, a follow-up review, and/or calculation of fiscal penalties may delay the issuance of a final report.

### How to Prepare for an AR

#### Resources and Documentation Required

In order to accurately determine whether or not requirements are being met, the reviewer must check records both at the SFA's district/main office and at the site(s) being reviewed. The reviewer will need access to a private work area at the district/main office where confidential paperwork can be reviewed. Prior to the review, written driving directions to the district/main office and to the review site(s) will also be needed.

All documentation listed below should be ready or easily retrievable at the time of the review:

- Direct certification source documents (DSS match report);
- Certified list of homeless, runaway, and migrant students;
- Verification Summary Report, to include all affected applications and income documentation;
- Documents supporting SCAPS reimbursement claim for review month;
- Operating calendar for current school year;
- Meal count reporting records;
- Civil rights documentation (e.g. proof that the public was notified of the availability of free and reduced-price benefits); and
- Procurement procedures.

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In addition to the above documentation, the following should be ready and available **for each of the review sites**:

- Meal applications (including withdrawn, temporary, and denied);
- Benefit issuance document (POS or manual roster) for review month;
- District's approved Policy Statement and Wellness Policy (for current school year on file at the district/main office and at each site being reviewed);
- Documentation of on-site reviews of the counting and claiming procedures (if more than one serving site);
- Edit check reports for review month;
- Menus and production records for review month;
- Student and parent involvement records;
- Food safety plan and last two Department of Health and Environmental Control inspection reports; and
- Serving times for breakfast, lunch, and snacks (if applicable).

<sup>c</sup> The reviewer will need paper copies of these as they may be included in the review file.

### **AR Self-Assessment Checklist**

The Administrative Review (AR) Self-Assessment Checklist, which is provided on the following pages, may be used by the SFA to evaluate its program at any time but will be particularly helpful when preparing for an AR. SFA staff should be able to respond “yes” to the questions. For additional information and guidance, contact the Office of Nutrition Programs at (803) 734-8188.

**Administrative Review Self-Assessment Checklist  
For SFAs**

	Item	Action Taken
<b>Access and Reimbursement</b>		
<b>Eligibility and Direct Certification</b>	Were all selected applications correctly approved?	
	Are the correct income eligibility guidelines used to certify applications?	
	Are the correct conversion factors used when processing applications that indicate more than one income frequency?	
	Are households correctly notified of eligibility consistent with FNS requirements?	
	Is household notification of denied benefits consistent with FNS requirements?	
	Does the direct certification list utilized by the SFA... <ul style="list-style-type: none"> <li>a. Contain the correct information for direct certification?</li> <li>b. Come from the proper agency (FNS, TANF, FDPIR, foster, homeless, runaway, migrant, Head Start, Even Start)?</li> </ul>	
	Does the SFA perform Direct Certification matches according to the required timeframes?	
	What is the SFA's procedure for extending free school meal eligibility to all children who are members of a household in which one person in that household is receiving SNAP, TANF, or FDPIR benefits?	
	For RCCIs with NO day students and no applications on-file, does the SFA have the correct eligibility documentation available for residential students?	

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<b>Eligibility and Direct Certification (Cont'd)</b>	Are free and reduced price benefits provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time in accordance with regulations and FNS Policy Memo SP45-2012?	
	If the SFA is a Residential Child Care Institution (RCCI), are there any day students?	
	If the SFA has an electronic application approval system: <ul style="list-style-type: none"> <li>a. How are records maintained and for how long?</li> <li>b. What are the back-up procedures to the electronic-based approval system.</li> </ul>	
	How long does the applications approval take from the date the SFA receives the application from the household?	
	Within the SFA, who has access to the applications within the system? (Names and/or position titles)	
<b>Benefit Issuance</b>	At the beginning of the school year, how is benefit status handled for children who have not submitted an application for the current school year?	
	Did the SFA accurately transfer the correct benefit from the eligibility determination document to the Point of Service benefit issuance document?	
	Does the benefit issuance system identify how eligibility was determined? (e.g., through application, direct certification, etc.)	
	Did the SFA update the benefit issuance document(s) timely and accurately, including those students that are new, transferred or withdrawn?	

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<b>Benefit Issuance (Cont'd)</b>	For Manual Systems: If number sheets and coded rosters are used, did the SFA/school document changes in student eligibility/enrollment throughout the month?	
	Did the SFA update benefit issuance documents timely and accurately upon receipt of Direct Certification updates?	
	Did the SFA extend benefits to students living in a household that is receiving FNS, TANF, or FDPIR benefits?	
	If any family declined or requested a lower level of benefits, were benefits changed on the Benefit Issuance document?	
	Who has access to the benefit issuance system and/or documentation? (Names and/or position titles)	
	How are eligibility determinations transferred to the benefit issuance document?	
	How are benefit issuance document(s) transferred to the point of service system?	
	How are eligibility status updates made to the point of service benefit issuance document(s)?	
	How frequently are updates made to the point of service benefit issuance document(s)?	
	Does the benefit Issuance document indicate the date changes were made in the system?	
	How and when are the following changes made to the point of service benefit issuance document?: <ul style="list-style-type: none"> <li>• new students</li> <li>• transfer students</li> <li>• withdrawn students</li> </ul> 30 day carryover of prior eligibility	

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	Is there a back-up system for updating benefit issuance document(s)?	
<b>Verification</b>	Do the verified applications on file match the number reported on the most recent FNS-742?	
	Did the SFA choose the correct verification sample size?	
	Did the SFA verify the correct number of applications based on their verification sample size?	
	Has the SFA completed the SA's verification training?	
	Does the SFA use an electronic system to identify error-prone applications?	
	If confirmation reviews were required, <ul style="list-style-type: none"> <li>a. Is documentation demonstrating that a confirmation review took place on file at the SFA?</li> <li>b. Did the SFA follow the required procedures if the confirmation review did not validate the original determination?</li> </ul>	
	Based on the review of verified applications: <ul style="list-style-type: none"> <li>a. Were the applications subject to verification properly selected in accordance with the sample size option used (i.e., error prone)?</li> <li>b. If the SFA chose to replace applications selected for verification, was it done correctly and limited to 5% of the applications selected?</li> <li>c. Were all applications selected for review verified correctly?</li> </ul>	
	Did the SFA attempt to directly verify selected applications?	
	Does the SFA's verification notification letter include all required information?	

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	Did the SFA meet the follow-up requirements if the household failed to respond to the request for verification?	
<b>Verification (Cont'd)</b>	If applicable, did the SFA's notice of adverse action contain all required information, including notification of appeal rights?	
	If a student's eligibility changed due to verification, <ul style="list-style-type: none"> <li>a. Did the SFA make updates to the eligibility status to benefit issuance list?</li> <li>b. Were benefits increased no later than 3 operating days and decreased no later than 10 operating days from the final decision?</li> </ul>	
	Did the SFA complete verification by November 15? If not, did the SFA get SA approval for an extension until December 15?	
<b>Meal Counting and Claiming</b>	Is the SFA following their approved SFA-SA Agreement/application (including POS)?	
	Does the SFA use an electronic or manual system to count and consolidate reimbursable meals?	
	Does the SFA have a backup system to their primary meal counting and claiming system should the primary system fail/not operate?	
	How often are cashiers and substitute cashiers trained on the meal counting and claiming system (including the backup system)?	
	Based on meal observation, does the meal counting system as implemented prevent overt identification of students receiving free and reduced price benefits?	

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	Does the school have separate dining areas, meal service times, or serving lines based on a student's eligibility status?	
<b>Meal Counting and Claiming (Cont'd)</b>	Does the school limit choice of reimbursable meals based on a student's eligibility status?	
	Does the school use different mediums of exchange based on eligibility status?	
	Does each type of meal service line as observed on the day of review provide an accurate count by eligibility category at the point of service (or approved alternate)?	
	On the day of review, are excessive overrides used at the POS?	
	At the end of meal service, how does the SFA obtain the daily meal counts by category from each school's point(s) of service?	
	What procedures are used as internal controls to ensure the meal counts do not exceed enrollment or attendance adjusted enrollment?	
	Does the SFA consolidate the Claim for Reimbursement?	
	Are meal counts automatically consolidated? a. If YES, does the software program contain edits and internal controls? b. If NO, when and how are edit checks and internal controls completed?	
	Are meal count totals by category combined and recorded correctly?	
	Were the counts from the non-reviewed schools for the review period correctly consolidated and claimed by the SFA?	

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	Have alternate points of service been approved by the SA?	
	If a school has more than one meal service line, how does the point of service system prevent duplicate or second meals from being claimed?	
<b>Meal Counting and Claiming (Cont'd)</b>	At the site level, how are the total daily meal counts by category submitted to the SFA for consolidation?	
	Are daily edit checks conducted at the site level?	
	Were there any days when the free, reduced price or paid meal counts exceeded the number of free, reduced price, or paid eligible students?	
	Were there any days when the free, reduced price, or paid <u>lunch</u> counts exceeded the number of attendance adjusted eligible students?	
	Were there patterns in the free, reduced or paid meal counts which appear questionable?	
<b>Nutritional Quality / Meal Pattern</b>		
<b>Meal Components and Quantities</b>	Were all required meal components available on every reimbursable meal service line to all participating students: <ul style="list-style-type: none"> <li>a. Prior to the beginning of meal service?</li> <li>b. During the meal service?</li> </ul>	
	Did all meals observed for the day of review counted for reimbursement contain all of the required meal components?	
	Do portion sizes meet the minimum amounts per meal pattern requirements and planned menu for the day of review?	

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	Was fluid milk available in at least the two required varieties throughout the serving period on all meal service lines? If milk substitutions are made, are they allowable?	
	For <b>NSLP</b> , are the minimum daily requirements of grains/breads, meat/meat alternate, fruits, and vegetables met for the age/grade group being served?	
<b>Meal Components and Quantities (Cont'd)</b>	For <b>SBP</b> , are the minimum daily requirements of grains/breads, fruits, and vegetables met for the age/grade group being served?	
	If school is serving multiple menus and/or age/grade groups, is the meal service structured to comply with the required age/grade group meal pattern requirements?	
	Has the school complied with the planned menu for the day of review? And, if changes are being made to the planned menu, are the changes acceptable substitutions?	
	Did all observed meals during the review period (production records and other supporting documentation) indicate that all of the required meal components per weekly meal pattern requirements were offered and served to students?	
	Do portion sizes meet the minimum amounts per meal pattern requirements and planned menu for the review period?	
	Did the school comply with the planned menu for the review period? And if changes are being made to the planned menu, are the changes acceptable substitutions?	
<b>Offer versus Serve</b>	Is Offer vs. Serve being implemented properly at the reviewed school sites?	

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	Has the cafeteria staff been trained on Offer vs. Serve?	
	Is there signage explaining what constitutes a reimbursable meal to students?	
<b>Dietary Specifications and Nutrient Analysis</b>	Based on the targeted menu review, did the school meet the Dietary Specifications (Calories, Saturated Fat, Sodium, and Trans Fat) for the appropriate age/grade group being served?	
<b>Dietary Specifications and Nutrient Analysis (Cont'd)</b>	Is the targeted menu review site in compliance with the meal pattern requirements (meal components and quantities)?	
	<p>Did the school/SFA provide the following documentation/materials needed to complete/validate the nutrient analysis? Are the necessary materials available?</p> <ol style="list-style-type: none"> <li>a. Menus <ul style="list-style-type: none"> <li>• The reviewer should conduct a weighted nutrient analysis based on meals offered for each USDA established age/grade group and menu type offered at lunch and breakfast.</li> </ul> </li> <li>b. Production records include all required information for each age/grade group and menu type. <ul style="list-style-type: none"> <li>• Production records (including salad bar/theme bar production records) must list all food or menu items offered as part of the reimbursable meal. Additional items such as condiments, gelatin, butter, must also be included. Portion sizes, total food quantity used to prepare each menu item or food item, and leftovers must be recorded.</li> </ul> </li> <li>c. Number of a la carte sales, adult, and “other” meals differentiated on production records</li> </ol>	

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<p><b>Dietary Specifications and Nutrient Analysis (Cont'd)</b></p>	<ul style="list-style-type: none"> <li>• If the same food items are used for reimbursable meals, a la carte sales and/or “other” meals (e.g., adult meals, meals for special diets), production records differentiate the number of menu items planned for each type of meal, or for a la carte sales.</li> <li>d. Standardized recipes include preparation instructions, portion sizes and yield used in the menus for the period of evaluation.</li> <li>e. Nutrition information is available for commercially prepared foods (e.g., Nutrition Facts Labels or Manufacturer’s Data Submission Forms).</li> <li>f. Food product descriptions/specifications indicate the specific form of the foods used (e.g., canned in light syrup, frozen, no added salt, 1 % lowfat milk).</li> <li>g. Crediting Information is available.             <ul style="list-style-type: none"> <li>• CN labels are useful because they give information on creditable food items for identifying a food-based reimbursable meal and help to identify specific commercially prepared foods in the CN Database. However, CN labels do not provide nutrient information for data input when conducting a nutrient analysis.</li> </ul> </li> </ul>	
	<p>Was the nutrient analysis software:</p> <ul style="list-style-type: none"> <li>a. USDA approved?</li> <li>b. Using most recent version of CN database?</li> </ul>	
	<p>What credentials, qualifications, and/or training, does menu planner have?</p>	
	<p>Were the appropriate Age/Grade groups used?</p>	

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	Was a separate analysis completed for breakfast and lunch, each age/grade group, and each menu type?	
	Does the method used for the nutrient analysis yield a correct weighted nutrient analysis?	
	Were all menu and food items, condiments, and foods of minimal nutritional value served as part of a menu item, included in the nutrient analysis?	
	Were recipes entered using the “yield factor method”?	
	Did the SFA/school reanalyze menus based on changes in student selections and participation?	
<b>Dietary Specifications and Nutrient Analysis (Cont’d)</b>	Are menus being reanalyzed based on changes in purchased products?	
	Did the SFA/school input nutrient data correctly for: <ul style="list-style-type: none"> <li>a. Local or USDA modified recipes?</li> <li>b. Food items not in the database?</li> </ul>	
<b>Resource Management</b>		
<b>Nonprofit School Food Service and Net Cash Resources</b>	Did the SFA have any financial findings related to the child nutrition programs on previous administrative reviews or audits within the past three years?	
	Did the SFA conduct a year-end review of total revenues and expenses to determine the school food service nonprofit status?	
	Did the SFA identify year-end expenses in excess of revenues?	
	Is the SFA compliant with net cash resources requirements in 7 CFR 210?	
	If the SFA had excess revenues at the end of the year, were surplus funds transferred out of the school food service account to support other operations?	

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	Do general expenses appear to be reasonable, necessary and allocable?	
	Do the recorded expenditures represent an activity or function that is recognized as reasonable and necessary for the operations of the programs?	
<b>Paid Lunch Equity</b>		
	Did the SFA correctly determine the paid lunch pricing?	
	Did the SFA increase its paid lunch prices if the Paid Lunch Equity tool indicated an increase in the paid lunch price was required?	
<b>Paid Lunch Equity (Cont'd)</b>	Did the SFA use non-Federal funds to support its paid lunch prices? And if yes, were the sources allowable and appropriately recorded in the nonprofit school food service account?	
	Did the SFA submit its most frequently charged paid lunch prices to the SA?	
<b>Non-Program Foods</b>	Was the SFA's proportion of total revenue from the sale of non-program foods to the total revenue of the school food service account <b>equal to or greater than</b> the proportion of total food costs associated with obtaining non-program foods to the total costs associated with obtaining program and non-program foods from the account?	
	If the SFA does not separate its program food costs from its non-program food expenses, does the SFA have a sufficient process in place to determine if revenue from non-program foods is equal to or exceeds non-program food costs?	
	Did all revenue from non-program foods accrue to the SFA's nonprofit school food service account?	

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	Does the SFA keep sufficient records to document its compliance with 7 CFR 210.15(b)(7)?	
<b>Adult Meals</b>	Are breakfasts and lunches served to teachers, administrators, custodians and other adults priced so that the adult payment in combination with any per-lunch revenues from other sources designated specifically for the support of adult meals (such as State or local fringe benefit or payroll funds, or funding from voluntary agencies) is sufficient to cover the overall cost of the lunch?	
<b>Indirect Costs</b>	Did the SFA obtain approved indirect cost rates from the State Education Agency (SEA)?	
<b>Indirect Costs (Cont'd)</b>	Did the SFA charge the school food service account for indirect costs?	
	Did the SFA apply the indirect cost rate to the correct direct cost base?	
	Did the LEA charge indirect costs at the State Agency's approved rate?	
	Are school food service accounts charged indirect costs consistently across the SFA?	
	Is the SFAs charged indirect costs that were previously paid from the general fund in previous years?	
	Is the SFAs account not charged directly for expenditures that are included in the indirect cost pool (double dipping)?	
	Does the SFA have documentation to support the indirect cost charged to the school food service account?	
<b>USDA Foods</b>	Does documentation demonstrate the nonprofit school food service has received the full value of USDA Foods (brown box and any processed finished products)?	

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	Does the SFA provide for proper storage and use of USDA Foods?	
	Based on the SA review of records, did the SFA receive the full value pass through (rebates, discounts, credits or net off invoice) it was entitled to?	
	Does the School Food Authority receive its USDA Foods from a purchasing agency, cooperative or distributor?	
	Does the School Food Authority or School Food Authority's purchasing agency or cooperative divert USDA Foods for processing?	
	Does the School Food Authority have a Food Service Management Company contract for food service and purchasing?	
<b>General Program Compliance</b>		
<b>Civil Rights</b>	What is the non-discrimination statement used for appropriate Program materials (please provide exact language)?	
<b>Civil Rights (Cont'd)</b>	What is the SFA's procedure for receiving and processing complaints alleging discrimination within FNS School Meal Programs?	
	Has the School Food Authority received any written or verbal complaints alleging discrimination in FNS Programs in the current or prior school year?	
	How are students with special dietary needs accommodated?	
	When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e. cafeteria staff, F/R application approval staff) and their supervisors?	
	Who attended these trainings?	

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	What topics were covered by the training?	
	How does the SFA collect racial/ethnic data?	
	How often is this information collected?	
	Are denied applications disproportionately composed of minority applications?	
	Is the USDA “And Justice for All” poster displayed in a prominent location and visible to recipients of benefits?	
	Did meal service observations on the day of review indicate that program benefits were made available to all children without discrimination?	
<b>Competitive Food Services</b>	Are any foods of minimal nutritional value available in any food service area during any of the meal periods?	
<b>Competitive Food Services (Cont’d)</b>	<p>Is the school in compliance with applicable competitive food sales policies and regulations?</p> <ul style="list-style-type: none"> <li>a. All food and beverage sales available on school premises during or before the established meal times are operated through the Child Nutrition Program.</li> <li>b. All receipts from food and beverage sales accrue to the Child Nutrition account.</li> <li>c. All income from the food service is used for the school’s non-profit lunch and breakfast program.</li> </ul>	
	Are other food and beverage sales on campus compliant with NC General Statute 115C-264?	
<b>Water</b>	Is free potable water available to program participants in each lunch meal service location(s)?	

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<b>SFA On-Site Monitoring</b>	How does the SFA ensure that all schools are meeting program requirements?	
	Were the on-site reviews for all selected sites completed prior to February 1 for LEAs and by Nov 1 and April 1 for non-public schools, Charters and RCCIs?	
	Were areas requiring corrective action identified?	
	Does documentation indicate that corrective action as a result of on-site monitoring was successful?	
<b>Local School Wellness Policy</b>	How does the public know about the Local School Wellness Policy?	
	When and how does the review and update the Local School Wellness Policy occur?	
	Who is involved in reviewing and updating the Local School Wellness Policy?	
	What is their relationship with the SFA?	
<b>Local School Wellness Policy (Cont'd)</b>	How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the Local School Wellness Policy?	
	Has an assessment on the implementation of the Local School Wellness Policy occurred during the school year?	
	How does the public know about the results of the most recent assessment on the implementation of the Local School Wellness Policy?	
<b>Food Safety</b>	Does the written food safety plan contain the required elements?	
	Was a copy of the written food safety plan available at each school?	

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	Have two (2) food safety inspections occurred in each site during the current school year?	
	Were two inspections received in the previous school year? If no, does the SFA have documentation to indicate that the SFA requested two (2) inspections in the current school year from the applicable agency?	
	Is the most recent food safety inspection report posted in a publicly visible location?	
	Were Hazard Analysis Critical Control Points (HACCP) principle violations observed?	
	Were selected temperature logs available for review?	
	Were on-site (or off-site, if observed) storage violations observed?	
<b>Reporting and Recordkeeping</b>	Are reports submitted to the State Agency as required?	
	Are records retained for 3 years after the final claim for reimbursement for the fiscal year or until resolution of any audits?	
<b>School Breakfast and Summer Food Service Program Outreach</b>	How did the SFA inform families of the availability of the School Breakfast Program prior to, or at the beginning, of the school year and provide reminders about the availability of the School Breakfast Program throughout the school year?	
	How did the SFA inform eligible families about the availability and location of free meals for students via the Summer Food Service Program?	
<b>Procurement</b>		
<b>Procurement Plan:</b>	Written procurement plan is in place and approved by Board of Education/Governing Board and	

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	<p>includes:</p> <ul style="list-style-type: none"> <li>• Specifies authorized purchaser</li> <li>• Procurement method to be used (quotes, IFB, RFP) including procedures for each method</li> <li>• Award method to be used (i.e., line item, bottom line)</li> <li>• Advertisement procedures</li> <li>• How vendor is to be notified of award /non-award</li> <li>• Code of ethics/conflict of interest policy</li> </ul>	
<b>Procurement Procedures:</b>	Procurement activities are in compliance with Federal regulations, State policies and procedures and local policies and procedures	
	Competition was sought for ALL purchases (goods and services) made with Child Nutrition funds	
	Procurement activities are consistent with the approved Procurement Plan	
	Correct purchasing method was used for purchases at or above the formal bid threshold limit	
<b>Procurement Procedures: (Cont'd)</b>	<p>Letter of invitation is issued and includes:</p> <ul style="list-style-type: none"> <li>• Intent of procurement activity</li> <li>• Contract time period</li> <li>• Bid submission procedures (i.e. sealed bid, written, etc.)</li> <li>• Pre-bid/proposal meeting date/time/location (if applicable)</li> <li>• Bid opening date/time/location</li> <li>• Contact information</li> <li>• Civil Rights Statement</li> </ul>	
<b>Invitation for Bid (IFB) and/or Request for Proposal (RFP):</b>	<p>Terms and conditions are included with IFB/RFP and include:</p> <ul style="list-style-type: none"> <li>• Certification regarding disclosure of lobbying (\$100,000+)</li> <li>• Debarment/suspension certification form (\$25,000+)</li> <li>• Non-collusion statement</li> <li>• Assurance of ethical practices</li> </ul>	

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	<ul style="list-style-type: none"> <li>• Escalation/de-escalation clause</li> <li>• Price determination statement (fixed, fixed w/ price adj., etc.)</li> <li>• Roll-over clause</li> <li>• Buy American statement</li> <li>• Bid protest procedures</li> <li>• Remedy for non-performance termination of contract</li> <li>• HUB statement to involve minority business where possible</li> <li>• "Equal Employment Opportunity" compliance statement (\$10,000+)</li> <li>• Energy Policy and Conservation Act statement</li> <li>• Clean Air/Water Act statement (\$100,000+)</li> <li>• Civil Rights Act statement</li> <li>• Record retention and record access requirements (are records maintained for 3 years from final payment of contract and/or renewal?)</li> <li>• Method of shipment/delivery requirements</li> <li>• Method of payment, invoices, statements, etc.</li> <li>• Purchase instrument to be used and how vendor will receive</li> <li>• Bid certification form</li> <li>• Lunsford Act Requirements</li> </ul>	
<p><b><i>Bid Specifications:</i></b></p>	<p>Bid specifications are in writing and include:</p> <ul style="list-style-type: none"> <li>• Product specifications (approved brand and/or equal)</li> <li>• Quantity</li> <li>• Quality</li> <li>• Packaging</li> <li>• Pricing (unit and extended)</li> <li>• Substitutions and/or deviations</li> </ul>	
<p><b><i>Procurement Documentation and Records:</i></b></p>	<ul style="list-style-type: none"> <li>• All IFB/RFP/Quote w/ appropriate documentation and signatures maintained (as listed above)</li> <li>• Comparison charts and reason for award documentation</li> </ul>	

## Chapter 16 – Administrative Review (AR)

	<ul style="list-style-type: none"> <li>• Record of public bid openings</li> <li>• Copies of award/non-award letters</li> <li>• Copies of advertisements</li> <li>• Determination of correct procurement method used</li> <li>• Evaluation of escalation/de-escalation clause implemented correctly</li> <li>• Evaluation/documentation of negotiations/changes to original contract</li> <li>• Do procurement activities agree w/ approved procurement plan</li> <li>• Records retention requirements (3 years + current school year from final payment and/or renewal)</li> <li>• Non-competitive purchases (sole source, emergency, etc.) are appropriately documented and have received approval from State Agency or governing board prior to award, including purchases through means of <i>piggybacking</i> onto another district's IFB</li> <li>• Invoices/payments for items purchased with CN funds</li> <li>• Have there been any contractor claims or breach of contract from vendors</li> </ul>	
<b>Other Federal Program Reviews</b>		
<b>Afterschool Snack Program</b>	Is documentation maintained that the site is located in an area eligible school in which 50% or more of the enrolled students are certified eligible for F/R price meals?	
	Is documentation maintained of F/R price eligibility for each student that receives a free or reduced price snack?	
	Are point-of-service snack counts by student/benefit category maintained?	
	Are snacks being properly counted and claimed?	

## Chapter 16 – Administrative Review (AR)

	<p>From reviewing production records for a minimum of 5 days from the review period are:</p> <ol style="list-style-type: none"> <li>a. Production records are completed daily and maintained for a minimum of 3 years?</li> <li>b. Do production records list each meal component and reflect that the planned portion sizes meet the meal pattern component requirements?</li> <li>c. Does it appear that each snack claimed for reimbursement met the 2 component per student requirements?</li> </ol>	
	Has the program been monitored within the first 4 weeks of operation each year?	
	Does the snack program conduct acceptable education or enrichment activities before, during or after the snack meal service?	
	Are snacks properly prepared, held, served, and stored within proper food safety practices?	
	Is the USDA/FNS approved non-discrimination poster prominently displayed and visible to program participants?	
<b>Seamless Summer Option</b>	Is the SFA operating any sites that were not approved?	
	Have there been any changes in the dates of operation from those approved?	
	Does the SFA have an adequate system for documenting the number of meals served under the SSO separately from those served at non-SSO sites during the same claim period?	
	Has the SFA reviewed all SSO sites at least once during each site's operation?	

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	Did the SFA advertise the availability and location of free meals at all of its area eligible sites to the community? And, did all advertising materials used contain the required non-discrimination statement? Meal Service Times?	
	Does the site have an academic summer school? If yes, does the academic summer school participate under the SSO? If yes, was the community made aware of the availability of meals under the SSO?	
	Was proper documentation for area eligibility determined correctly and kept on file?	
	Were all meals served and claimed for reimbursement served only to eligible participants?	
	Were all required meal components available on every reimbursable meal service line to all participating students? a. Prior to the beginning of meal service? b. During the meal service?	
	Did all observed meals claimed for reimbursement contain the required number of components at the point of service?	
<b>Seamless Summer Option (Cont'd)</b>	Do portion sizes appear to meet the minimum quantity requirements as defined by the menu planner?	
	Are the minimum daily and weekly requirements of grains/breads, meat/meat alternate, fruits, and vegetables met for the age/grade group being served?	
	Was a variety of fluid milk throughout the serving period on all serving lines?	
	Is Offer versus Serve properly implemented?	

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	Does the meal counting system produce an accurate count of reimbursable meals?	
	Did the site provide a media release and/or promotional material to serviced areas?	
	Does the system as implemented prevent overt identification of children receiving free meal benefits?	
	Do production records, nutrient analysis and/or other supporting meal documentation for the five operating days prior to the meal observation indicate that required meal components were available?	
	Was an on-site review conducted by the SFA at least once during the site's operation?	
	Is a USDA/FNS approved poster displayed in a prominent place and visible to recipients?	
	Are bilingual services (translators and materials) available for the Limited English Proficiency (LEP) population?	
	Are Program benefits made available and provided to all children without discrimination on the basis of their race, color, national origin, age, disability, sex, familial status, parental status, religion, sexual orientation, political beliefs, genetic information, reprisal, or because all or part of an individual's income is derived from any public assistance program?	
<b>Seamless Summer Option (Cont'd)</b>	Is a food safety program in place?	
	Is free potable water provided to program participants in each lunch meal service location(s)?	

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<b>Fresh Fruit and Vegetable Program</b>	Is the school on track to spend no more than 10% of its total grant on administrative costs?	
	Did the cost documentation provided support the school's FFVP claim for reimbursement?	
	Is the cost documentation for allowable FFVP costs?	
	Is the FFVP offered during the school day, but outside the meal service times of the NSLP and/or SBP?	
	Is the FFVP widely publicized within the school?	
	Were any of the following unallowable products offered during the FFVP meal service: frozen, canned, and other types of processed fruits/vegetables; fruit/vegetable juice, nuts, cottage cheese, trail mix, fruit/vegetable pizza, smoothies, fruit strips, fruit drops, fruit leather, jellied fruit, or carbonated fruit?	
	Did the school choose to offer dip with the day's offering? If YES, was it fat-free or low-fat, no greater than 2 Tablespoons, and provided for vegetables only?	
	Is a cooked vegetable offered on day of review? If yes, is it included as part of a nutrition education lesson?	
	Is this the only offering of a cooked vegetable this week?	
<b>Fresh Fruit and Vegetable Program (Cont'd)</b>	Are the only adults provided with fresh fruits and vegetables teachers who are in the classroom with students during the FFVP meal service?	
	Did the FFVP meal service follow HACCP principles and applicable sanitation and health standards?	

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<b>Special Milk Program</b>	If the SFA is operating a pricing program, does the purchase price of milk on the most recent claim for reimbursement match the purchase price reflected on invoices? Are reimbursements being used to reduce students' payments?	
	Do the daily milk count records support the most recent claim for reimbursement?	
	Do the milk service counting procedures yield accurate milk counts?	
	Does the school count milk at the point-of-service?	

(Important Note: This checklist is intended to support compliance with Federal and State Regulations consistently throughout the operation of the Child Nutrition Program. It is not intended to prepare a SFA for an Administrative Review. This checklist is not an all-inclusive list of items to be addressed during a review.)

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**Chapter 17 – The SC Farm to School Program**

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## The South Carolina Farm to School Program

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The Farm to School initiative is an effort to connect schools (K - 12) with regional or local farms in order to serve healthy meals using locally produced foods. According to the USDA, the term "Farm to School" encompasses efforts that bring local or regionally produced foods into school cafeterias; hands-on learning activities such as school gardening, farm visits, and culinary classes; and the integration of food-related education into the regular, standards-based classroom curriculum.

Comment [SD1]: I only use Farm to School typed out fully in the document so I don't need the abbreviation listed.

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### Program History:

Farm to School programs originated through pilot projects in California and Florida in the late 1990's. In recent years such programs have experienced a boom in popularity and now Farm to School programs are operational in more than 10,000 schools spanning all 50 states.

The USDA began supporting these initiatives in 2000 with the establishment of the National Farm to School Program and later, in 2001, with the Small Farms/School Meals Initiative. The "Know Your Farmer, Know Your Food" initiative was formed as a USDA-wide effort to create new economic opportunities by better connecting consumers with local producers. One of the goals for this initiative is to break down barriers and support policies that focus on the connection between farmers and consumers. Out of this goal, and in response to the growing demand for Farm to School activities, in September of 2009 the "USDA Farm to School Team" was established. The Team works with local and state authorities, school districts, farmers, and community partners to develop mechanisms to 1) assist schools in accessing local markets, 2) enable food producers to effectively service their local schools, and 3) facilitate communication between interested stakeholders.

In South Carolina, the statewide South Carolina Farm to School Program originated as a two-year funded project from the Centers for Disease Control and Prevention. Currently, the South Carolina Farm to School is a joint effort of the South Carolina Department of Health and Environmental Control, the South Carolina Department of Agriculture, the South Carolina Department of Education, and Clemson University.

### Program Legislation:

#### National

Healthy Hunger-Free Kids Act: In December of 2010, the Healthy, Hunger-Free Kids Act was signed into law. This Act authorized and funded the USDA to provide technical assistance and competitive matching farm to school grants. The grants may be used for training, supporting operations, planning, purchasing equipment, developing school gardens, developing partnerships and implementing farm to school activities. The USDA will receive five million dollars each year beginning in October, 2012 (fiscal year 2013) to administer these grants and provide technical assistance.

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#### State

South Carolina Fresh on the Campus: On June 7, 2013 Governor Nikki Haley signed South Carolina's "Fresh on the Campus" legislation into law. Bill S. 191 created a program within the South Carolina Department of Agriculture to encourage schools to

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serve locally grown, minimally processed farm foods. This program will foster relationships between South Carolina farms, school districts, and other institutions and regularly consult with the staff of the South Carolina Department of Education, the South Carolina Department of Health and Environmental Control, and Clemson University, along with other state agencies concerning implementation.

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### **Goals and Requirements of the SC Farm to School Program:**

Core components of the South Carolina Farm to School Program include increasing the number of farmers that are certified to provide locally grown products into schools; providing education to foodservice staff and teachers on Farm to School practices; and providing hands-on learning activities to promote healthy eating among school children.

The South Carolina Farm to School Program supports schools in implementing the four components of Farm to School. Participating schools are required to: 1) source at least two SC grown fruits and vegetables per month to be served as a part of the school meal; 2) promote SC grown in the school cafeteria; 3) integrate nutrition and agriculture education into classroom activities; and 4) establish a school vegetable garden.

### **Program Administration:**

The USDA Farm to School Program is operated by the Department's Food and Nutrition Service (FNS), which has seven regional offices around the country; in each is a Farm to School Regional Lead who is available to provide Farm to School related support to state agencies and other entities in their region.

In South Carolina, staff supporting the South Carolina Farm to School Program are housed at the South Carolina Department of Education, the South Carolina Department of Health and Environmental Control, and the South Carolina Department of Agriculture.

### **Additional Info:**

For information on becoming a SC Farm to School Program site visit [www.scfarmtoschool.com](http://www.scfarmtoschool.com).

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To learn more about incorporating local produce and other Farm to School activities into your School Food Service operation, contact Sydney Daigle, SCDE Farm to School Coordinator.

Sydney Daigle  
Farm to School & Fresh Fruit and Vegetable  
Program Coordinator  
South Carolina Department of Education, Office of Nutrition Programs  
803-734-8045| phone  
803-917-2770| cell  
803-737-4148| fax  
[sdaigle@ed.sc.gov](mailto:sdaigle@ed.sc.gov)

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# Chapter 18 – Healthy School Environment & Wellness

## Overview of a Healthy School Environment

A healthy school environment gives students consistent reliable health information and ample opportunity to use it. For example, in a healthy environment:

- The classroom, the school dining room, and other school activities provide clear and consistent messages that explain and reinforce healthy eating and physical activity habits.
- Students learn to make healthy lifestyle choices not only in the classroom and the school dining room, but also at class parties, sports events and wherever they are throughout the day.
- Students have many opportunities to practice healthy habits. They can choose from an array of healthy food options, eat in relaxed and comfortable surroundings and enjoy daily physical activity.

## Why Is a Healthy School Environment Important?

Recent trends in childhood obesity and the health consequences of those trends make it more important than ever to provide a healthy school environment.

### Statistics and Trends among Children

- Data from the National Health and Nutrition Examination Survey (NHANES) shows that although obesity rates among children have been fairly stable since the 1990s, between a 1976-1980 survey and one conducted between 2003-2006, obesity rates increased as follows:
  - Children aged 2-5 years increased from 5.0 percent to 12.4 percent,
  - Children aged 6-11 years increased from 6.5 percent to 17.0 percent,
  - Children aged 12-19 years increased from 5.0 percent to 17.6 percent.
- According to South Carolina's data from the 2011 Youth Risk Behavior Survey:
  - 13 percent of high school students in South Carolina were obese in 2011 and an additional 16 percent were overweight.
  - 85 percent of South Carolina high school students do not eat the recommended five servings of fruits and vegetables each day.
  - 33 percent of high school students in South Carolina drink at least one sugar-sweetened soft drink a day.

### Health Consequences of Obesity

- Health risks now
  - Childhood obesity can have a harmful effect on the body in a variety of ways. Obese children are more likely to have–
    - High blood pressure and high cholesterol, which are risk factors for cardiovascular disease (CVD). In one study, 70% of obese children had at least one CVD risk factor, and 39% had two or more.
    - Increased risk of impaired glucose tolerance, insulin resistance and type 2 diabetes.
    - Breathing problems, such as sleep apnea, and asthma.
    - Joint problems and musculoskeletal discomfort.
    - Fatty liver disease, gallstones, and gastro-esophageal reflux (i.e., heartburn).
    - Obese children and adolescents have a greater risk of social and psychological problems, such as discrimination and poor self-esteem, which can continue into adulthood.
- Healthy risks later
  - Obese children are more likely to become obese adults. Adult obesity is associated with a number of serious health conditions including heart disease, diabetes, and some cancers.
  - If children are overweight, obesity in adulthood is likely to be more severe.

**For more information, please visit: [www.cdc.gov/obesity/childhood](http://www.cdc.gov/obesity/childhood)**

### Local Wellness Policies

The Child Nutrition and WIC Reauthorization Act of 2004 required all districts to establish local school wellness policies by School Year 2006-2007.

The Healthy, Hunger-Free Kids Act (HHFKA) of 2010 expands the scope of wellness policies; brings in additional stakeholders in its development, implementation and review; and requires public updates on the content and implementation of the wellness policies (Section 204). The intent is to strengthen local school wellness policies so they become useful tools in evaluating, establishing, and maintaining healthy school environments, and to provide transparency to the public on key areas that affect the nutrition environment in each school.

At a minimum, a local school wellness policy must:

- Include goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
- Include nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
- Permit parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and review and update of the local wellness policy.
- Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies.

## Chapter 18 – Healthy School Environment & Wellness

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- Be measured periodically on the extent to which schools are in compliance with the local wellness policy, the extent to which the local education agency's local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy, and make this assessment available to the public.

For School Year 2013-2014, local educational agencies are encouraged to continue reviewing and assessing their local wellness policies and implementing the new requirements.

Monitoring for Local School Wellness Policies falls under the General Areas of the Administrative Review. The scope of monitoring may require the SA to assess how unit(s) of the local educational agency, other than the school food service, implement their Local School Wellness Policy responsibilities, as applicable. See Chapter 16: Administrative Review (AR) for additional information.

For assistance with modifying or implementing a wellness policy, contact the Office of Nutrition Programs, SCDE at (803) 734-8188.

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**Comparison Chart of the 2004 and 2010 Requirements for Local School Wellness Policies (LWP)**

	<b>2004 Requirements Child Nutrition WIC Reauthorization</b>	<b>2010 Requirements Healthy, Hunger-Free Kids Act</b>
<b>Overview</b>	<b>Directs local educational agencies (LEAs) to have a LWP in place for each school under its jurisdiction.</b>	<b>Strengthens LWPs and adds requirements for public participation, transparency, and implementation.</b>
<b>Elements of the Local School Wellness Policy</b>	LWP to include, at a minimum, goals for nutrition education, physical activity, and other school-based activities to promote student wellness, as well as nutrition guidelines for all foods available on school campus.	In addition to the 2004 requirements, the LWP is also to include goals for nutrition promotion.
<b>Stakeholder Involvement</b>	LEAs are required to involve parents, students, and representatives of the school food authority, the school board, school administrators, and the public in the development of LWP.	In addition to the 2004 requirements, LEAs are now required to permit teachers of physical education and school health professionals to participate in the development of LWP.
<b>Stakeholder Participation</b>	The stakeholders named above are required to participate in the development of the LWP.	In addition to the 2004 requirements, LEAs are now required to permit all stakeholders named above and in 2004 to participate in the implementation and periodic review and update of LWP.
<b>Local Discretion</b>	LEAs can determine the specific policies appropriate for the schools under their jurisdiction, provided that those policies include all required elements specified in the Act.	Same as 2004 requirement.
<b>Public Notification</b>	None.	LEAs are required to inform and update the public (including parents, students, and others in the community) about the content and
<b>Measuring Implementation</b>	LEAs are required to establish a plan for measuring implementation of the LWP.	LEAs are required to periodically measure and make available to the public an assessment on the implementation of LWP, including the extent to which schools are in compliance with LWP, the extent to which the LWP compares to model LWP, and a description of the progress
<b>Local Designation</b>	LEAs are required to establish a plan for measuring LWP implementation to include delegating one or more persons with the responsibility for ensuring LWP compliance.	LEAs are required to designate one or more LEA officials or school officials to ensure that each school complies with the LWP.

Created by US Department of Agriculture’s Food and Nutrition Service (USDA FNS); US Department of Education (ED); and US Department of Health and Human Services, Centers for Disease Control and Prevention (CDC). (12/11; rev 12/12, 7/12/13)

### Additional Requirements for Elementary (K-5) School Food Service Meals and Competitive Foods

In addition to the menu planning requirements described in Chapter 19 and the regulations on competitive foods described in the [Chapter 22: Competitive Foods Policy](#), all public and charter schools that serve a K-5 population in South Carolina are required to follow all requirements provided in the “Student Health and Fitness Act of 2005.” Private and parochial schools and residential child care institutions are encouraged but not required to follow these regulations. Please be aware that new Competitive Foods guidelines will come out in 2015-16 as part of the Healthy Hunger –Free Kids Act of 2010 that will change these requirements. The current requirements are as follows:

#### Student Health and Fitness Act of 2005

##### 1. School Meals

- School meals should be made attractive to students by appealing to their taste preferences and meeting their cultural needs. Therefore, elementary schools must:
  - Offer at least two entrée choices at lunch (one choice may be an entrée salad).
  - Encourage input regarding the selection of food items to be offered in the school meal programs by promoting and encouraging student and parent participation in taste-testing events, in menu-review panels, and in online recipe reviewing.
  - Require that school cafeteria managers meet with student advisory committees in grades four through five a minimum of twice each year.
  - Allow students to purchase at à la carte prices additional servings of any food item that is part of a reimbursable school meal (serving sizes should be comparable to those of the meal components).
- School meals should not only provide the optimal nutrition that students need for growth, development, and academic achievement but should also support the development of healthful eating behaviors in students, including their learning to eat a variety of foods. Therefore, school districts must:
  - Offer a low-fat meal choice (30 percent or less of calories from fat) at every meal.
  - Provide low-fat and nonfat salad dressings.
  - Provide information on calories, percentages of fat, and serving sizes of school meal items to help children select appropriate portions of food.
  - Offer a minimum of four choices of fruits and vegetables daily, including fresh fruits and vegetables in season. Salad bars or prepackaged salads may be included. Students can take two to four servings based on the school district’s discretion.
  - Encourage students to try a variety of foods by serving the full reimbursable meal.

##### 2. Other Foods and Beverages (Competitive Foods)

- All foods sold at any K–5 public school site should not only provide the optimal nutrition that students need for growth, development, and academic achievement but should also support the development of healthful eating behaviors in students. Therefore, school districts must:
  - Ensure that one serving of snacks, sweets, and side dishes has no more than 30 percent of calories from fat, less than ten percent of calories from saturated fat, no more than one percent of calories from trans fatty acids, and no more than 35

- percent of added sugar by weight. (Note: Nuts, seeds, and some cheeses are exceptions. Although more than 30 percent of their calories come from fat, these foods can be considered appropriate and nutritious snacks when served in small portions.)
- Limit single-serving food items sold to students to the following maximum portion sizes: 1.25 ounces for snacks (includes baked chips, crackers, popcorn, cereal, trail mix, nuts, seeds, dried fruits, jerky); two ounces for cookies or cereal bars; three ounces for other bakery items (sweet rolls, muffins, etc.); four ounces for frozen desserts, including ice cream; eight ounces for yogurt (not frozen); and ½ cup for fried potatoes or other fried vegetables.
  - Ensure that single servings of entrée items and side dishes are no larger than the portions of those foods served by the CNP.
- All beverages sold or otherwise made available to students should not only provide the optimal nutrition that students need for growth, development, and academic achievement but should also support the development of healthful eating behaviors in students. Therefore, school districts must:
    - Make the following beverages available to all students: low-fat milk, nonfat milk, water, and 100% juices that do not contain added sugars or sweeteners.
    - Not sell or serve the following beverages to students until after the last regularly scheduled class: soda, soft drinks, sports drinks, punches, iced teas and coffees, and fruit-based drinks that contain less than 100% real fruit juice or that contain added sweeteners.
    - Not sell beverages—except water or nonfat, low fat milk—in portions larger than 12 ounces.

### Healthy Fundraising

Food items are often sold in schools to generate funds for programs and activities. However, often these foods are low in nutritional value, widely available to students and sold in competition with healthy school meals. Following are some proven ideas for “health” fundraisers, excerpted from “Twenty Ways to Raise Funds without Candy” developed by the Illinois Nutrition Education and Training Program.

**Plant Sale** – Ask parents to donate plants for sale. A garden club raises \$1,000 - \$2,000 each year from this type of entrepreneurship.

**G.S.T. (Goods, Services, Talents) Auction** – Solicit local businesses, parents, community members, or groups of school children to provide donations for an auction. One school that held such an auction had items available including a week at a time-share, a week at a cottage, hair care services, a lawn tractor, furniture, food and restaurant gift certificates. This school raised \$20,000.

**Administrative Fun** – Have jars available in which students can place money. On a daily bases, have the school secretary count the amount in the jars and post the total. At set increments (for example, \$100, \$200, \$500), the principal or a teacher could be required to do stunts such as dress as a cheerleader, do cheers, act out a scene from a play, etc. One school earned over \$3,300 in one year through this type of fundraiser.

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**Spring Yard Work** – A soccer team offered to rake yards and spread compost at a bargain rate. Ten players each worked for 3 ½ days, and made on average \$240 for the soccer team.

**Community Job Fair** – Ask local companies to rent a booth space for a fee and solicit free advertisements from local radio stations and/or newspapers. One school that held a job fair charged \$4 for admission and raised \$24,000 in the two years they have held the fair.

**School Event Planners** – These planners sold \$7 each at school registration. The planners included event dates such as football games, holidays, national tests, dances and band events. Fifty percent of the sales were profit.

**Advertisements of Seat Cushions** – Sell advertising space on seat cushions to local businesses. Sell seat cushions at sporting events.

Below are some creative fundraising ideas excerpted from “Creative Financing & Fun Fundraising for Schools, Sports & Clubs” developed by the California Department of Education, California Project LEAN.

### Items You Can Sell

Bumper stickers/decals  
Buttons, pins  
Candles  
Cookbook made by school  
Crafts  
Emergency kits for cars  
Erasers  
First aid kits  
Greeting cards  
Magazines  
Megaphones  
Pet treats/toys  
Rent a special parking space  
School Frisbees  
School supplies  
Souvenir cups  
Student directories  
Trendy pencils  
T-shirts with school insignia  
Valentine flowers

### Healthy Food Items

Frozen bananas  
Fruit and nut baskets  
Fruit and yogurt parfaits  
Fruit smoothies  
Trail mix

### Events that Involve the Community

Car wash  
Conference  
Gift wrapping  
Golf tournament  
Magic show  
Recycling  
Singing telegrams  
Talent show  
Treasure/scavenger hunt  
Walk-a-thon  
Workshop/class

**South Carolina  
School Food Service Program Reference Manual  
Contributors: All Education Associates  
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# Chapter 19 – Food-Based Menu Planning

## Overview

The Food Based Menu Planning Model specifies minimum quantities of foods that must be served from each of five food components:

1. Meat/Meat Alternate
2. Vegetables
3. Fruits
4. Grains/Breads
5. Fluid Milk

The Food-Based meal pattern is designed to meet the nutrition goals by providing the following:

- $\frac{1}{4}$  of the Recommended Dietary Allowances (RDA) for key nutrients and calories needed for specific age/grade groups for breakfast.
- $\frac{1}{3}$  of the RDA for key nutrients and calories for specific age/grade groups for lunch.
- Consistency with the Dietary Guidelines for Americans (DGAs).

Although SFAs may, and are encouraged to, complete a nutrient analysis as often as desired to determine how well the nutrition goals listed above are being met, it is not required. The South Carolina Department of Education (SCDE) may complete a nutrient analysis and will make this determination when conducting an Administrative Review (AR).

## Nutrient Standards

When menus are averaged over a school week, they should meet the nutrition goals listed above and should provide the required amounts of nutrients for the age/grade group(s) being served as shown in Table 19.1 for breakfast and Table 19.2 for lunch. The amounts shown in the tables are  $\frac{1}{4}$  of the RDA for breakfast and  $\frac{1}{3}$  of the RDA for lunch. They are the minimum amounts required for school meals when averaged over the course of a week.

**Table 19.1 –Nutrient Standards Required\* for BREAKFAST Using the Food-Based Meal Pattern (School Week Averages)**

<b>2013-2014 NEW USDA FOOD BASED <u>BREAKFAST</u> MEAL PATTERN</b>												
<b>Grades K-12 Breakfast: 450-500 calories a day</b>												
<b>Grades K-8 : 400-500 calories/day</b>						<b>Grades 6-12: 450-550 calories/day</b>						
	<b>Grades K-5</b>				<b>Grades 6-8</b>				<b>Grades 9-12</b>			
<b>Daily Calorie Range</b>	<b>350-500 calories a day</b>				<b>400-550 calories a day</b>				<b>450-600 calories a day</b>			
	Daily min	5 Day Max	6 day Max	7 Day Max	Daily min	5 Day Max	6 day Max	7 Day Max	Daily min	5 Day Max	6 day Max	7 Day Max
<b>Food Components</b>												
1. Fluid Milk	1 c	No Weekly Maximum			1c	No Weekly Maximum			1c	No Weekly Maximum		
2. Fruit/Veg of Juice	1/2 c	No Weekly Maximum			1/2 c	No Weekly Maximum			1/2 c	No Weekly Maximum		
3. Grain 2013-14 =50% WG-Rich 2014-15= 100% WG-Rich	1 oz	7-10 oz	8.5-12 oz	10-14 oz	1 oz	8-10 oz	9.5-12 oz	11-14 oz	1 oz	9-10 oz	11-12 oz	12.5-14 oz
Meat/Meat Alternate (M/MA)	Can be substituted for grain after 1 oz. equivalent of grain has been served or M/MA can be served as an "extra" food item fitting within the caloric range.											
Milk-must offer <b>two choices</b> for B & L daily						<b>Skim/Fat Free:</b> Flavored or Unflavored: fluid milk, lactose-reduced, buttermilk or acidified. <b>Low-fat/ 1%</b> Unflavored: fluid milk, lactose-reduced, buttermilk, acidified.						
***Meal pattern subject to future USDA updates.	OVS must take 3 of the 4 items											

**Table 19.2 – Nutrient Standards Required\* for LUNCH Using the Food-Based Meal Pattern (School Week Averages)**

		Grades K-8 600-650 calories											
		Grades K-5				Grades 6-8				Grades 9-12			
Daily Calorie Range		550-650 calories				600-700 calories				750-850 calories			
		Daily min	5 Day Max	6 day Max	7 Day Max	Daily min	5 Day Max	6 day Max	7 Day Max	Daily min	5 Day Max	6 day Max	7 Day Max
<b>Food Components</b>													
<b>1. Meat/Meat Alternate</b>	1 oz	8-10 oz	10-12 oz	12-14 oz	1 oz	9-10 oz	11-12 oz	12-13 oz	1 oz	10-12 oz	12-14 oz	14-16 oz	
<b>2. Fruit</b>	1/2 c	1/2 c	3 c	3 1/2	1/2 c	2 1/2 c	3 c	3 1/2	1 cup	5 cups	6 cups	7 cups	
<b>3. Veg: Total</b>	<u>3/4</u> c	<u>3.75</u> c	<b>4.5</b>	<b>5.25</b>	<u>3/4</u> c	<u>3.75</u> c	<b>4.5</b>	<b>5.25</b>	<u>1</u> cup	5 cups	6 cups	7 cups	
Dark green <b>Weekly</b>		1/2 c				1/2 c				1/2 c			
red/orange <b>Weekly</b>		3/4 c				3/4 c				1+ 1/4 c			
Beans/peas <b>Weekly</b>		1/2 c				1/2 c				1/2 c			
Other <b>Weekly</b>		1/2 c				1/2 c				1/2 c			
Starchy <b>Weekly</b>		1/2 c				1 c				1 c			
Additional <b>Weekly</b>		1/2c								+1/2 c			
	1 c	1 c											
<b>4. Grain</b> 2012-13=50% WG 2013-14= 100% WG	1 oz	8-9 oz	10-11 oz	11-12.5	1 oz	8-9 oz	10-11 oz	11-12.5	2 oz	10-12 oz	12-14 oz	14-16 oz	
<b>5. Milk- 8 oz every day</b>	<b>8 oz daily</b>				<b>8 oz daily</b>				<b>8 oz daily</b>				
Milk-must offer <b>two choices</b> for B & L daily					<b>Skim/Fat Free: Flavored or Unflavored:</b> fluid milk, lactose-reduced, buttermilk or acidified. <b>Low-fat/ 1% Unflavored:</b> fluid milk, lactose-reduced, buttermilk, acidified.								
***Meal pattern subject to future USDA updates.					<b>*OVS must take 3 of the 5 items and one of these must be 1/2 c Fruit or Vegetable. Students in grades 9-12, if a student select a 1/2 cup of fruit and vegetable and one other component the student must take one cup of fruit or vegetable to meet the offer vs. serve requirement.</b>								

**VEGETABLE SUB-GROUPS**

**Dark Green Vegetables**

bok choy  
broccoli  
  
collard greens  
dark green leafy  
lettuce  
  
kale  
  
mesclun  
mustard  
greens  
romaine  
lettuce  
  
spinach  
turnip greens  
  
watercress



**Red and Orange Vegetables**

acorn  
squash  
  
butternut  
squash  
  
carrots  
  
hubbard squash  
pumpkin  
red  
peppers  
  
sweet potatoes  
  
tomatoes  
tomato  
juice



**Starchy Vegetables**

cassava  
  
corn  
fresh cowpeas,  
field peas or  
black-eyed peas,  
(not dry)  
green bananas  
  
green peas  
green lima  
beans  
  
plantains  
  
potatoes  
  
taro  
water  
chestnuts

**Beans and Peas**

baked beans,  
black beans  
black-eyes peas  
(mature, dry)  
garbanzo beans  
(chickpeas)  
kidney  
beans  
lentils  
navy beans  
pinto beans  
soybeans  
split peas  
white beans

**Other Vegetables**

artichokes  
  
Asparagus  
  
avocado  
  
bean sprouts  
Brussels sprouts  
cabbage (red & green)  
cauliflower  
eggplant  
green  
beans  
iceberg (head) lettuce  
  
jicama  
mushrooms  
okra  
onions (all  
types)  
parsnips  
radishes  
turnips  
wax beans  
yellow  
peppers  
zucchini

## Breakfast Meal Pattern

The Food-Based breakfast meal pattern defines which food components must be included in a reimbursable meal. As shown below in [Table 19.3](#), there are two options available. Fluid milk and either a vegetable, fruit or juice are required in all three options. The variable is the Grains component and the meat/meat alternate component. The breakfast meal may consist of two servings of grains/breads or one serving of Grains and one ounce of meat/meat alternate substituted for the second one ounce serving of Grains.

**Table 19.3 Food-Based Meal Pattern for Breakfast**

Option 1	OR	Option 2
Fluid Milk (8 oz)		Fluid Milk (8 oz)
Vegetable/Fruit/Juice (½ c.)		Vegetable/Fruit/Juice (½ c.)
Grains/Breads (2 servings)		Grains (1 serving)
		Meat/Meat Alternate (1 oz)

## Food Components for Breakfast

### Fluid Milk

- Students in grades K-12 must be offered eight fluid ounces or half a pint of fluid milk at each breakfast.
- Fluid milk may be served as a beverage, on cereal or both.
- Product options include skim (flavored and unflavored), 1% unflavored, lactose-free (flavored and unflavored milks).

### Fruit/Juice

- The minimum creditable amount is ⅓ cup. These are minimums and have no upper limits except for juice considerations.
- Fresh, canned, and frozen may be used interchangeably.
- A serving of canned fruit may include the 100% juice, water packed or light syrup in which the fruit is packed unless otherwise indicated in the *Food Buying Guide for Child Nutrition Programs*.
- Dried fruits credits at twice the volume served (i.e. one quarter=cup of dried fruit counts as ½ cup of fruit)
- At breakfast, Pasteurized, 100%, full-strength juice may be used to meet the full vegetable/fruit/juice requirement. (Note, however, that at lunch, juice may only be used to meet half of the requirement.) Any product, either liquid or frozen, labeled “juice,” “full-strength juice,” “single-strength juice,” or “reconstituted juice” is considered full-strength juice.
- A serving of thawed frozen fruit is fruit plus the juice that accumulated during thawing.

### Vegetable

- The minimum creditable amount is ⅓ cup of vegetable juice. These are minimums and have no upper limits except for juice considerations.
- Raw leafy greens are credited as explained on slide. They count as half the amount served.
- Dry beans and peas used in items such as a breakfast burrito may count as a vegetable or meat alternate but not as both in the same meal.

- To aid in the absorption of iron from bread and cereal products, it is recommended that a fruit or vegetable high in vitamin C be offered daily.

### Grains

- Grain items may be counted toward meeting the meal component requirements only if they are made from enriched or whole grain meal or flour or bran or germ. At least half of the grains offered at lunch must be whole grain-rich during School Year 2012-2013 and 2013-2014. During SY 2012-13 and SY 2013-14 only, up to half of the required grains offered may be refined-grain foods that are enriched. Beginning SY 2014, all grains served must meet whole grain-rich criteria.
- Cereals must be whole grain, enriched or fortified.
- Serve whole grains whenever possible.
- Acceptable grains include but are not limited to:
  - A variety of hot and cold breads made with enriched or whole grain meal or flour including cornbread, biscuits, bagels, rolls, tortillas, muffins, and crackers.
  - Cereal grains (cooked) such as rice, bulgur, oatmeal, corn grits, wheat or couscous that are enriched, whole grain, or fortified.
  - Ready-to-eat breakfast cereals that are enriched, whole grain, or fortified. Note that some of the iron fortified cereals on the market may also contain considerable amounts of sugar and should be avoided.
  - Cereals or bread products that are used as an ingredient in another menu item such as crispy rice treats, oatmeal muffins, breading on French toast sticks, flour in pancake and waffle batter, and bread in breakfast sandwiches when they are enriched, whole grain, or fortified.
  - Macaroni or noodle products (cooked) made with enriched or whole grain flour.
  - Sweet foods such as toaster pastries, coffee cake, doughnuts, sweet rolls, or formulated grain-fruit products when made with enriched or whole grain meal or flour and served as permitted.
- School must offer at least a minimum amount of grains daily to meet the required weekly range. Table 19.14 – Whole Grain-Rich Ounce Equivalency (OZ EQ) Required for School Meal Program.

### Meat/Meat Alternate

- Schools have discretion to offer a meat/meat alternate item in place of grains after the minimum daily grains requirement (1 oz eq) is met. Schools have the option to serve one ounce equivalent servings of grains and a meat/meat alternate item every day at breakfast and count both toward the weekly grains requirement for all grade groups.
- Beans/peas (legumes) may be credited as a meat/meat alternate item and count toward the Grains component, provided that at least one oz eq of grains is also offered that day as part of a reimbursable breakfast. Additionally, if counted as a meat/meat alternate, they cannot be counted towards meeting the Fruit/Vegetable component.
- Schools may also offer a meat/meat alternate item as an “extra” food (not counting toward the weekly grains requirement) if it fits within the weekly dietary specifications.

## Lunch Meal Pattern

To meet the requirements of the National School Lunch Program (NSLP) using Traditional Food-Based Menu Planning, students must be offered minimum quantities of five food items from four food components:

- Meat/Meat Alternate - 1 serving
- Vegetables and/or Fruits - 2 servings
- Grains/Breads - 1 serving
- Fluid Milk - 1 serving

The minimum serving size required varies by age/grade group. Larger servings and other foods may be served at meals to improve acceptability, to satisfy students' appetites, to provide additional energy and, if carefully chosen, to increase the nutritional quality of the lunch. For detailed information on the Traditional Food-Based Menu Planning lunch pattern and on the minimum serving sizes required for each age/grade group, refer to Table 19.3 - Food-Based Meal Pattern Requirements for Lunch provided in this section of the *Program Reference Manual*.

### South Carolina Student Health and Fitness Act of 2005

The South Carolina Student Health and Fitness Act of 2005 requires all elementary schools serving a K-5 population to offer a choice of two entrees at lunch and at least four fruits and vegetables daily. See Chapter 18 – Healthy School Environment & Wellness in this *Program Reference Manual* for additional information on these and other requirements.

#### Definition of Terms

When planning menus, it is essential to understand the difference between a component, food item and menu item. Table 19.4 – Application of Terms provided below, illustrates the difference between these terms. Menu items are the actual foods served, such as tacos, fruit salad, and muffins. Food items are similar to components but the Food-Based Menu Planning lunch meal pattern requires that there be two different sources of fruits and/or vegetables. Each of these is a separate “food item.” The terms vegetable and fruit are components.

**Table 19.4 – Application of Terms**

Components	Food Items	Menu Items
1. Meat/Meat Alternate	1. Meat/Meat Alternate	1. Chicken
2. Vegetable	2. Fruit	2. Fruit Cup
3. Fruit	3. Vegetable	3. Green Beans
4. Grains	4. Grains	4. Whole Grain Roll
5. Milk	5. Milk	5. Milk

Table 19.5 - Menu Items Containing Two or More Food Items, provided in this section, gives examples that further explain the difference between components, food items and menu items.

**Table 19.5 – Menu Items Containing Two or More Food Items**

Components	Menu Items					
	Hamburger <i>* 3 food items *</i>		Tacos <i>* 3 food items *</i>		Cheese Pizza <i>* 3 food items *</i>	
Meat/Meat Alternate	Beef	2 oz	Beef	1.5 oz	Cheese	2 oz
			Cheese	0.5 oz		
Vegetable	Lettuce/ Tomato	½ cup (1 food item)	Lettuce/ Tomato	½ cup (1 food item)	Sauce	½ cup (1 food item)
Fruit	Small Apple	½ cup	Orange slices	½ cup	Fruit cup	½ cup
Grains	Bun	1 serving	Whole Grain	1 serving	Pizza Crust	1 serving

## Meat/Meat Alternate Component

### Creditable Foods

Any of the foods listed below may be counted as the meat/meat alternate when served alone or in combination with each other in a main dish or in a main dish and one other menu item. Two menu items is the maximum number that may be used to meet the meat/meat alternate requirement.

- Lean meat, poultry, or fish - 2 ounces (edible portion as served)
- Alternate protein product (APP) – 2 ounces
- Cheese – 2 ounces
- Egg – 1 egg
- Cooked dry beans or dry peas – ½ cup
- Peanut butter or other nut and seed butters – 4 Tbsp
- Yogurt – 8 ounces
- Peanuts, soy nuts, and tree nuts such as walnuts and nutritionally comparable seeds (not to exceed 50% of the total required amount of meat/meat alternate) – 1 ounce

### Minimum Amounts to Be Credited

- Small amounts (less than ¼ oz.) of meat/meat alternate used as garnishes, seasoning, or in breading (e.g. grated Parmesan cheese or egg) do not count toward meeting the meat/meat alternate requirement of the meal.
- Although use of such garnishes is encouraged to make the lunch more appealing, the amounts are not sufficient to make a real nutritional contribution to the lunch.

### Cooked Dry Beans or Peas

- May be used as a meat alternate or vegetable but may not count as both components in the same meal.
  - Example 1: Beans in chili served as the main dish. Count the beans either as the meat alternate or as the vegetable, not both.
  - Example 2: Beans in a burrito may not be counted as the meat alternate if beans are also served as a vegetable side dish in the same meal.

### Yogurt

- May be used to meet all or part of the meat/meat alternate requirement.
- Eight ounces or one cup of yogurt is the equivalent of two ounces of meat/meat alternate.
- May be plain or flavored, unsweetened or sweetened.
- Noncommercial and/or nonstandardized yogurt products, including the following, **MAY NOT** be used to meet the meat/meat alternate requirement:
  - Frozen yogurt
  - Homemade yogurt
  - Yogurt flavored products
  - Yogurt bars
  - Yogurt covered fruit and/or nuts
  - Similar products

### Nuts & Seeds

- Nuts (peanuts, soy nuts, tree nuts) and seeds may only be used to meet one half of the meat/meat alternate requirement. The other half must be met using another type of meat/meat alternate (such as lean meat, poultry, fish, cheese, large egg, peanut butter, etc.)

- Example 1: 1 ounce of chopped nuts served in a chicken dish with 1 ounce of chicken
- Example 2: 1 ounce of peanuts served with a sandwich containing 1 ounce of cheese
- Acorns, chestnuts and coconuts (a seed) cannot be counted as a meat alternate.

### Cheese

- Low fat and reduced fat cheeses may be counted, ounce for ounce, the same as regular fat cheeses as long as the products meet the U.S. Food and Drug Administration's (FDA's) requirements and regulations for use of those nutrient content claims which are as follows:
  - "Lowfat" cheese must contain three grams or less total fat per 50 grams of product.
  - "Reduced fat" cheese must contain at least 25 percent less fat per 50 grams than the regular product.
- Cheese substitutes may be counted. Cheese food substitutes and cheese spread substitutes receive the same credit as cheese foods and cheese spreads (2 ounces provide 1 ounce of equivalent meat alternate).
- Products labeled as "imitation" cheese or simply as "cheese product" **ARE NOT** creditable.

### Commercially Prepared Foods

Commercially prepared meats/meat alternatives **MAY NOT** be counted toward component requirements unless one of the following is obtained:

- A Child Nutrition (CN) label from the manufacturer providing information concerning the contribution the product makes toward the meat/meat alternate requirement.
- A product analysis sheet from the manufacturer.

### Meat and Poultry Topped Pizza

FSIS has exempted meat and poultry topped pizzas from federal meat inspection requirements. The principal provisions of the Rule include:

- Meat or poultry products must have been previously inspected and passed in a cooked or cured ready-to-eat form.
- Pizzas must be served in public or private nonprofit institutions.
- Pizzas must be transported directly to the receiving institution by employees of the preparing firm, receiving institution, or food service management company employed by the receiving institution.
- Firms claiming the exemption must comply with specific provisions of the FDA's 1976 *Food Service Sanitation Manual*, which have been incorporated by reference into the rule. In addition, the rule establishes specific requirements for the manual or machine cleaning of utensils and equipment.
- FSIS may withdraw or modify the exemption for any firm if necessary to ensure food safety and public health. The rule establishes due process procedures for taking such actions.
- Firms claiming the exemption are free to sell fresh meat or poultry topped pizzas to SFAs participating in the National School Lunch Program (NSLP).
- Under the exemption, state and local health inspection programs have primary responsibility for sanitation. FSIS also reserves the right to conduct any inspections it deems appropriate.

### Alternate Foods

Two alternate foods are authorized to meet part of the meat alternate requirement: whole grain macaroni with fortified protein and alternate protein products (APP).

#### How are commercially prepared products used in the NSLP?

Schools and institutions may use a commercially prepared meat or meat alternate product combined with APP or use a commercially prepared product that contains only APP.

### Foods That May Not Be Credited as a Meat/Meat Alternate

The following foods may be served but **MAY NOT** be used to meet the meat/meat alternate requirement. That is, they are considered “extra” food items.

- Acorns, chestnuts, coconuts
- Bacon
- Cream cheese, imitation cheese, cheese product, cheese sauce - processed
- Frozen yogurt, homemade yogurt, yogurt flavored products, yogurt bars, yogurt covered fruit and/or nuts

Refer to the *Food Buying Guide – Other Foods* section for a more complete list of non-creditable foods.

### Common Problems with the Meat/Meat Alternate Component

It is seldom noted on an Administrative Review (AR) that a menu did not offer a meat/meat alternate. However, it is often noted that the meat/meat alternate was offered in insufficient amounts. To assist in evaluating the meat/meat alternate menu items offered, refer to the flow chart in Table 19.10 – Determining the Contribution of a Menu Item to the M/MA Component of the School Lunch Pattern provided in this chapter of the *Program Reference Manual*.

Below are some specific problems commonly found during SMI reviews and a suggested solution for each problem.

1. Meat products with an unknown meat and fat content are being purchased and served as a reimbursable component of the lunch.

Solution: Secure a CN label or product analysis sheet before serving the menu item. Monitor deliveries to ensure products used are those ordered and documented. Use the USDA Standards for Meat and Poultry Products to determine the content of certain products used in the CNP.

2. The recipe does not include a sufficient amount of meat/meat alternate to yield the predicted number of servings.

Solution: Check all SFA recipes against the *Food Buying Guide*.

3. The menu item is served with the wrong-sized utensils, thus changing the contribution of the menu item to the meat/meat alternate component.

Solution: List serving size or proper utensil to be used on the production record as well as on the recipe. Monitor meal service and production records for unexpected leftovers or shortages.

4. Cooked dry beans or peas are used as meat alternate and vegetable in the same meal.

Solution: When using cooked dry beans or peas as the meat/meat alternate in a menu item such as bean burrito, remember to plan two other vegetables or fruits in sufficient amounts. (A reminder might be noted on the recipes for such menu items.)

**Table 19.6 - Determining the Contribution of a Menu Item to the M/MA Component of the School Lunch Pattern**

**Directions:**

1. Identify the product.
2. Begin with Question 1 and proceed through Question 4, advancing until the answer is “Yes.”
3. When the answer is yes, read across for guidance.

<p><b>Question 1</b> Is the product made in a kitchen in the SFA “from scratch?” <b>- OR -</b> Do you know the total weight or measure of the ingredients contributing to the meat/meat alternate component (and the fat content when applicable)?</p> <p><b>Examples</b> Kitchen made chili con carne, tuna noodle casserole, turkey pot pie, and beef patties shaped from bulk ground beef</p>	s a u c e s	Yes →
No ↓		Yes →
<p><b>Question 2</b> Is the purchased-prepared meat item 100% meat/meat alternate?</p> <p><b>Examples</b> Preformed ground beef patties and unbreaded fish portions</p>		Yes →
No ↓		Yes →
<p><b>Question 3</b> Is it possible to separate the meat/meat alternate from the other ingredients in the purchased-prepared menu item?</p> <p><b>Examples</b> Beef in BBQ sauce, corn dog, and breaded fish portions</p>		Yes →
No ↓		Yes →
<p><b>Question 4</b> Is the purchased-prepared menu item a combination of foods from which the meat/meat alternate cannot be separated from the other ingredients?</p> <p><b>Examples</b> All products containing APP and all canned and dry cheese</p>		Yes →

## Chapter 19 – Food-Based Menu Planning

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**Guidance** Using the *Food Buying Guide* and your SFA's recipe for the product, determine if the total amount of meat/meat alternate used will yield the projected number of servings.

**Guidance**

Weigh the cooked product.

**Guidance** Separate the meat/meat alternate from the other ingredients and weigh the cooked meat/meat alternate.

- OR -

Purchase a CN labeled product.

- OR -

Secure a product analysis sheet.

**Guidance** Purchase a CN labeled product.

- OR -

Secure a product analysis sheet.

## Fruit Component

### Amount Required

- Lunch
  - Grades K-8 must be offered at least a ½ cup per day of fruits daily.
  - Grades 9-12 must be offered at least a 1 cup per day of fruits daily.
  - Students in South Carolina elementary (K-5) schools must be offered a minimum of four choices of fruits and vegetables daily, including fresh fruits and vegetables in season. See [Chapter 18 – Healthy School Environment & Wellness](#) for additional information.
- Breakfast
  - Grades K-12 must be offered at least a ½ cup per day of fruits daily
  - Beginning the 2014-15 school year, grades K-12 must be offered at least a 1 cup per day of fruits daily.
  - Beginning the 2014-15 school year, grades K-12 may substitute an appropriate amount of vegetables for all or part of the fruit requirements for breakfast.

### Minimum Amounts to be Credited

- Small amounts (less than ⅛ cup) of fruits used for flavoring or as an optional ingredient such as a garnish, MAY NOT be counted toward the fruit requirement.
- A ⅛ cup or larger serving of fruits may be counted toward the fruit requirement.

### Combination Fruits

- Menu items such as fruit cocktail and fruit salads are considered one item/serving.
- However, large combination fruit salads which contain the minimum daily quantity by grade groups of fruits in combination with a meat/meat alternate intended to fulfill the role of an entrée, such as a chef's salad or a fruit plate with cottage cheese, are considered as two or more servings of fruit and will meet the full requirement.

### Juice and Juice Drinks

The following juice products may be used toward meeting the vegetable/fruit component when these conditions are met:

- Full-strength fruit or vegetable juice is an undiluted product obtained by extraction from sound fruit or vegetable. It may be fresh, canned, frozen, or reconstituted from a concentrate and may be served in either liquid or frozen state or as an ingredient in a recipe. The name of the full-strength fruit or vegetable juice as it appears on the label must include the word(s) “juice” or “full-strength juice” or “single-strength” or “100 percent juice” or “reconstituted juice” or “juice from concentrate.”
- A “juice drink” is a product resembling juice that contains full-strength juice along with added water and possibly other ingredients, such as sweeteners, spices, or flavorings. A juice drink may be canned, frozen or reconstituted from a frozen concentrate or a “juice base.” It may be served in either liquid or frozen state or as an ingredient in a recipe. A juice drink may be used toward meeting the vegetable/fruit component of the CNP under these conditions:
  - It must contain a minimum of 50 percent full-strength juice. (Note: Nectars and some common juice drinks, such as lemonade and cranberry juice cocktail do not contain sufficient quantities of full-strength juice to meet this criterion. Nectars do not commonly contain 50 percent juice. Lemonade and cranberry juice cocktail require dilution beyond the 50 percent limit for palatability.)
  - Only the full-strength juice portion of the juice drink may be counted toward meeting the vegetable/fruit component for the reimbursable breakfast and lunch.

- The name of the product as it appears on the label must contain words such as “juice drink” or “diluted juice beverage” and may indicate the percent full-strength juice in the product.
- The label ingredient statement must list “juice,” “full-strength juice,” “single strength juice,” “reconstituted juice,” “juice from concentrate,” or “juice concentrate.”
- A “juice concentrate” may be used toward meeting the vegetable/fruit component of the CNP. When a juice concentrate or a juice drink concentrate is used in its reconstituted form, it is considered a full-strength juice or a juice drink as appropriate, and is credited accordingly. When a juice concentrate is used in its concentrated form, it may be credited on a reconstituted basis; that is, credited as if it were reconstituted. For example, a gelatin product containing one tablespoon of orange juice concentrate per serving could receive ¼ cup vegetable/fruit credit since the orange juice concentrate theoretically could be reconstituted in a ratio of one part concentrate to three parts water (1 Tbsp. concentrate + 3 Tbsp. water = 4 Tbsp. or ¼ cup credit).

Good menu planning principles should be used in planning menus that use juices or juice drinks. For example, full-strength juice rather than a juice drink may be more desirable in order to keep the level of liquids in the meal at a reasonable level.

### **Important Point!**

Full-strength vegetable/fruit juice may not be used to meet more than one-half of the vegetable/fruit requirement at lunch. Any product, either liquid or frozen, labeled “juice,” “full-strength juice,” “single-strength juice,” or “reconstituted juice” is considered full-strength juice.

## Vegetable Component

### Amount Required

- Lunch
  - Grades K-8 must be offered at least a 3/4 cup per day of vegetables daily.
  - Grades 9-12 must be offered at least a 1 cup per day of vegetables daily.
  - Refer to Table 19c.2 for vegetable subgroups
  - Students in South Carolina elementary (K-5) schools must be offered a minimum of four choices of fruits and vegetables daily, including fresh fruits and vegetables in season. See [Chapter 18 – Healthy School Environment & Wellness](#) for additional information.
- Breakfast
  - Grades K-12 must be offered at least a ½ cup per day of vegetables daily
  - Beginning the 2014-15 school year, grades K-12 may substitute an appropriate amount of vegetables for all or part of the fruit requirements for breakfast.
  -

### Number of Vegetables Offered

- Students in South Carolina elementary (K-5) schools must be offered a minimum of four choices of fruits and vegetables daily, including fresh fruits and vegetables in season. See [Chapter 18 – Healthy School Environment & Wellness](#) for additional information.
- All other students must be offered two or more servings of different vegetables and/or fruits in order to meet the vegetable/fruit requirement.

### Minimum Amounts to be Credited

- Small amounts (less than 1/8 cup) of vegetables/fruits used for flavoring or as an optional ingredient such as a garnish, may not be counted toward the vegetable/fruit requirement.
- A 1/8 cup or larger serving of vegetables/fruits may be counted toward the vegetable/fruit requirement.

### Combination Vegetables

- Menu items such as fruit cocktail and mixed vegetables are considered one item/serving.
- However, large combination vegetable or fruit salads which contain the minimum daily quantity by grade groups of vegetables/fruits in combination with a meat/meat alternate intended to fulfill the role of an entrée, such as a chef's salad or a fruit plate with cottage cheese, are considered as two or more servings of vegetable/fruit and will meet the full requirement.

## Serving Salsa

*May salsa be credited as a vegetable/fruit component in the CNP?*

Yes, under certain circumstances. Most salsas contain only vegetable ingredients and are widely used as a side dish, rather than as a condiment, in amounts greater than 1/8 cup. Therefore, it may be credited towards the vegetable/fruit component if the following criteria are met:

1. A minimum of 1/8 cup must be served.
2. For products that contain all vegetable ingredients plus minor amounts of spices or flavorings, 100 percent of the product may be used to meet the volume requirement. The USDA commodity salsa fits into this category. For products that contain non-vegetable components, like gums, starches or stabilizers, only that portion of the product that is a vegetable ingredient may be counted towards the volume requirement.
3. The purchaser is responsible for maintaining documentation on the percentage of vegetable in the product. This will need to be supplied and documented by the manufacturer or can be written into a product specification that goes out for bid.

### Dry Peas and Beans

- Cooked dry peas or beans may be used as a vegetable or as a meat alternate but not as both in the same meal.

### Extruded Vegetable Products

- Meal pattern contributions of extruded vegetable products have not been determined for the *Food Buying Guide*. Therefore, a product analysis sheet should be requested from the manufacturer and used to determine the product's contribution toward the vegetable/fruit meal pattern requirement.
- For additional information, refer to the section entitled, "Product Analysis Sheets" provided later in this chapter of the *Program Reference Manual*.

### Sulfiting Agents in Foods

- Sulfiting agents (used to prevent fruits and vegetables from turning brown and to enhance their crispness) have caused life-threatening reactions in some individuals. USDA therefore **recommends that they not be used** in the CNP.

### Foods That May Not Be Credited as a Vegetable

- The following foods may not be used to meet the vegetable requirement:
  - Canned pie filling
  - Catsup
  - Hominy
  - Pasta
  - Pickle Relish
  - Potato or snack chips
  - Preserves
  - Rice
  - Salsa if it contains thickeners, sugars, gums
  - Taco or picante sauce

### **Increasing Consumption**

- When making the decision on portion sizes of vegetables/fruits to be served, plate waste must be a factor. Decreasing the quantity of less popular vegetables/fruits and increasing the quantity of popular vegetables/fruits served would lead to increased consumption of vegetables/fruits, which is a primary goal in meeting the *Dietary Guidelines*.
- Special promotions and classroom education has been shown to increase the acceptability of unfamiliar and/or less popular vegetables/fruits.

### **Foods High in Vitamin A, Vitamin C, and Iron**

Vegetables and fruits are particularly good sources of vitamin A, vitamin C and iron but some are better sources than others. See Table 19.7 for a list of nutrient-rich foods. To meet the nutrition goals, plan menus that include:

- 2 or 3 vitamin A foods each week.
- 4 vitamin C foods each week.
- A variety of iron rich foods each day.

**Table 19.7 – Foods Rich in Vitamin A, Vitamin C, and Iron**

Vegetables and Fruits that are Sources of <b>Vitamin A:</b>	Vegetables and Fruits that are Sources of <b>Vitamin C:</b>	Foods that are Sources of <b>Iron:</b>
<p><b>Excellent Sources:</b>                      Beet Greens                      Carrots                      Chili Peppers, red                      Collards                      Kale                      Mangoes                      Mustard Greens                      Peas and Carrots                      Pumpkin                      Spinach                      Squash, winter (acorn, butternut, hubbord)                      Sweet Potatoes                      Turnip Greens</p>	<p><b>Excellent Sources:</b>                      Broccoli                      Brussels Sprouts                      Cantaloupe                      Cauliflower                      Chili Peppers, red and green                      Grapefruit                      Grapefruit Juice                      Kiwi Fruit                      Mangos                      Mustard Greens                      Orange Juice                      Oranges                      Papaya                      Peppers, sweet red and green                      Strawberries                      Tangerines</p>	<p><b>Vegetable/Fruit Sources:</b>                      Apricots, dried                      Asparagus                      Beans (green, wax, lima)                      Broccoli                      Brussels Sprouts                      Dark Green Leafy Vegetables (collard, kale, mustard greens, spinach, swiss chard, turnip greens)                      Dried Fruits (apple, apricots, dates, figs, peaches, prunes, raisins)                      Prune Juice                      Sweet Potatoes                      Tomato Products (paste, puree)                      Tomatoes, canned</p>
<p><b>Good Sources:</b>                      Apricots                      Broccoli                      Cantaloupe                      Leaf Lettuce                      Mixed Vegetables (with carrots or broccoli)                      Peppers, sweet red                      Romaine Lettuce</p>	<p><b>Good Sources:</b>                      Asparagus                      Cabbage, red                      Pineapple                      Pineapple Juice                      Sweet Potatoes (except those canned in syrup)                      Tomatoes                      Turnip Greens</p>	<p><b>Grains Sources:</b>                      All enriched or whole-grains/breads</p>
<p><b>Fair Sources:</b>                      Asparagus, green                      Cabbage, red                      Chili Peppers, green                      Nectarines                      Papayas                      Peaches                      Peas, regular or edible pod                      Prunes                      Purple Plums                      Tomato Products (paste, salsa, sauce, spaghetti sauce)                      Tomatoes                      Watermelon</p>	<p><b>Fair Sources:</b>                      Cabbage, green                      Okra                      Potatoes (fresh or reconstituted instant mashed – vitamin C restored)                      Sauerkraut                      Spinach                      Tomato Products (juice, salsa, sauce, spaghetti sauce)</p>	<p><b>Meat/Meat Alternate Sources:</b>                      Beef and other red meats in general, especially liver and other organ meats                      Dry Beans and Peas                      Eggs                      Peanut and other nuts and seeds and their butters                      Shellfish</p>

### Common Problems with the Vegetable/Fruit Component

It is often noted during AR reviews that a menu did not offer two or more vegetable/fruit items or that the items were offered in insufficient amounts. Below are some specific problems found and suggested solutions for these problems.

1. Food items that do not count toward contributing to the vegetable/fruit component are mistakenly used and counted. Examples of such items include pasta and rice, which actually contribute to the grains/breads component, and hominy, pickle relish, potato chips, and tomato catsup, which are considered “other” foods and do not contribute to the school lunch pattern.

Solution: When in doubt about what contribution a particular food item makes to the school lunch patterns, consult the *Food Buying Guide* or contact SCDE.

2. Juice drinks are mistakenly credited as full-strength fruit juice in contributing to the vegetable/fruit component.

Solution: “Juice drinks” served either in liquid or frozen form may contain only a small amount of full-strength juice. The product label may or may not indicate the percentage of full-strength juice in the product. This information is needed to determine the contribution of the product to the meal. Read the labels of all juice products used in the SFA and determine the appropriate portion size and contribution to the school lunch pattern accordingly. Note that some frozen sweetened juice concentrates yield a full-strength juice when diluted one to one. Read the label for directions.

3. Breaded or extruded vegetable or fruit items are served and credited before a determination of the contribution of the product to the school lunch patterns has been made. Examples of breaded items include breaded okra, onion rings, and squash. Extruded items include a variety of vegetables or fruits combined with other ingredients and are often breaded.

Solution: Determine the contribution of breaded products by removing the breading of the cooked product and measuring the volume of vegetable; document findings. Determine the contribution of extruded products by obtaining a product analysis sheet before serving.

## Grains Component

### Number of Servings Required

The minimum required servings of grains by grade level is as follows:

- Grades K-5: 1 oz eq. min. daily (8-10 oz weekly)
- Grades 6-8: 1 oz eq. min. daily (9-10 oz weekly)
- Grades 9-12: 1 oz eq. min. daily (10-12 oz weekly)

At least half of the grains must be whole grain-rich beginning July 1, 2012. Beginning July 1 2014, all grains must be whole grain rich. For each day less than a five-day week, the school may decrease the servings per week by approximately 20 percent grains (one-fifth).

### **Creditable Grains**

Any of the following can be used as a serving of grain:

- One slice of whole grain or enriched flour bread.
- A whole grain or enriched meal or flour biscuit, bagel, roll, tortilla, muffin, cracker, etc.
- A serving of cooked whole grain or enriched cereal grains, such as rice, bulgur, oatmeal, corn grits, or couscous.
- A serving of whole grain, enriched or fortified ready-to-eat breakfast cereal.
- A serving of whole grain, enriched or fortified cereals or bread products that are used as an ingredient in another menu item (such as crispy rice treats, oatmeal cookies, or breading on meats, fish or poultry).
- A serving of cooked enriched or whole grain macaroni or noodle products. Enriched macaroni-type products with fortified protein (as specified in Appendix A of program regulations) may be counted as meeting either the grains/breads requirement or the meat/meat alternate requirement of lunches but not both in the same meal.
- A serving of pie crust when made from enriched or whole grain meal or flour from meat/meat alternate pies.
- A serving of snack products such as hard pretzels, hard bread sticks, and chips made from whole grain and/or enriched meal or flour.

### **Criteria for Determining Acceptable Grains**

The following criteria are used as a basis for crediting items to meet the grains requirement:

- The item must be whole grain or enriched or made from whole grain or enriched meal or flour. If it is a cereal, the product must be whole grain, enriched or fortified. Bran and germ are credited the same as enriched or whole grain meal or flour.
- The label must indicate that the product is enriched or whole grain, made from enriched or whole grain meal or flour as well as bran and/or germ, or fortified. If it is enriched, the item must meet the FDA's Standard's of Identity for enriched bread, macaroni and noodle products, rice, cornmeal, or corn grits.
- The item must be provided in quantities specified in the regulations and in minimum serving sizes.

## Chapter 19 – Food-Based Menu Planning

### EXHIBIT A: SCHOOL LUNCH AND BREAKFAST

#### WHOLE GRAIN-RICH OUNCE EQUIVALENCY (OZ EQ) REQUIREMENTS FOR SCHOOL MEAL PROGRAMS<sup>1,2</sup>

GROUP A	OZ EQ FOR GROUP A
<ul style="list-style-type: none"> <li>• Bread type coating</li> <li>• Bread sticks (hard)</li> <li>• Chow mein noodles</li> <li>• Savory Crackers (saltines and snack crackers)</li> <li>• Croutons</li> <li>• Pretzels (hard)</li> <li>• Stuffing (dry) Note: weights apply to bread in stuffing.</li> </ul>	<p>1 oz eq = 22 gm or 0.8 oz</p> <p>3/4 oz eq = 17 gm or 0.6 oz</p> <p>1/2 oz eq = 11 gm or 0.4 oz</p> <p>1/4 oz eq = 6 gm or 0.2 oz</p>
GROUP B	OZ EQ FOR GROUP B
<ul style="list-style-type: none"> <li>• Bagels</li> <li>• Batter type coating</li> <li>• Biscuits</li> <li>• Breads (sliced whole wheat, French, Italian)</li> <li>• Buns (hamburger and hot dog)</li> <li>• Sweet Crackers<sup>4</sup> (graham crackers - all shapes, animal crackers)</li> <li>• Egg roll skins</li> <li>• English muffins</li> <li>• Pita bread (whole wheat or whole grain-rich)</li> <li>• Pizza crust</li> <li>• Pretzels (soft)</li> <li>• Rolls (whole wheat or whole grain-rich)</li> <li>• Tortillas (whole wheat or whole corn)</li> <li>• Tortilla chips (whole wheat or whole corn)</li> <li>• Taco shells (whole wheat or whole corn)</li> </ul>	<p>1 oz eq = 28 gm or 1.0 oz</p> <p>3/4 oz eq = 21 gm or 0.75 oz</p> <p>1/2 oz eq = 14 gm or 0.5 oz</p> <p>1/4 oz eq = 7 gm or 0.25 oz</p>
GROUP C	OZ EQ FOR GROUP C
<ul style="list-style-type: none"> <li>• Cookies<sup>3</sup> (plain - includes vanilla wafers)</li> <li>• Cornbread</li> <li>• Corn muffins</li> <li>• Croissants</li> <li>• Pancakes</li> <li>• Pie crust (dessert pies<sup>3</sup>, cobbler<sup>3</sup>, fruit turnovers<sup>4</sup>, and meat/meat alternate pies)</li> <li>• Waffles</li> </ul>	<p>1 oz eq = 34 gm or 1.2 oz</p> <p>3/4 oz eq = 26 gm or 0.9 oz</p> <p>1/2 oz eq = 17 gm or 0.6 oz</p> <p>1/4 oz eq = 9 gm or 0.3 oz</p>

<sup>1</sup> The following food quantities from Groups A-G, must contain at least 16 grams of whole-grain or can be made with 8 grams of whole-grain and 8 grams of enriched meal and/or enriched flour to be considered whole grain-rich.

<sup>2</sup> Some of the following grains may contain more sugar, salt, and/or fat than others. This should be a consideration when deciding how often to serve them.

<sup>3</sup> Allowed only as dessert at lunch as specified in §210.10.

<sup>4</sup> Allowed for desserts at lunch as specified in §210.10, and for breakfasts served under the SBP.

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<b>GROUP D</b>	<b>OZ EQ FOR GROUP D</b>
<ul style="list-style-type: none"> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, unfrosted)</li> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (plain)</li> <li>• Muffins (all, except corn)</li> <li>• Sweet roll<sup>4</sup> (unfrosted)</li> <li>• Toaster pastry<sup>4</sup> (unfrosted)</li> </ul>	<p>1 oz eq = 55 gm or 2.0 oz</p> <p>3/4 oz eq = 42 gm or 1.5 oz</p> <p>1/2 oz eq = 28 gm or 1.0 oz</p> <p>1/4 oz eq = 14 gm or 0.5 oz</p>
<b>GROUP E</b>	<b>OZ EQ FOR GROUP E</b>
<ul style="list-style-type: none"> <li>• Cereal bars, breakfast bars, granola bars<sup>4</sup> (with nuts, dried fruit, and/or chocolate pieces)</li> <li>• Cookies<sup>3</sup> (with nuts, raisins, chocolate pieces and/or fruit purees)</li> <li>• Doughnuts<sup>4</sup> (cake and yeast raised, frosted or glazed)</li> <li>• French toast</li> <li>• Sweet rolls<sup>4</sup> (frosted)</li> <li>• Toaster pastry<sup>4</sup> (frosted)</li> </ul>	<p>1 oz eq = 69 gm or 2.4 oz</p> <p>3/4 oz eq = 52 gm or 1.8 oz</p> <p>1/2 oz eq = 35 gm or 1.2 oz</p> <p>1/4 oz eq = 18 gm or 0.6 oz</p>
<b>GROUP F</b>	<b>OZ EQ FOR GROUP F</b>
<ul style="list-style-type: none"> <li>• Cake<sup>3</sup> (plain, unfrosted)</li> <li>• Coffee cake<sup>4</sup></li> </ul>	<p>1 oz eq = 82 gm or 2.9 oz</p> <p>3/4 oz eq = 62 gm or 2.2 oz</p> <p>1/2 oz eq = 41 gm or 1.5 oz</p> <p>1/4 oz eq = 21 gm or 0.7 oz</p>
<b>GROUP G</b>	<b>OZ EQ FOR GROUP G</b>
<ul style="list-style-type: none"> <li>• Brownies<sup>3</sup> (plain)</li> <li>• Cake<sup>3</sup> (all varieties, frosted)</li> </ul>	<p>1 oz eq = 125 gm or 4.4 oz</p> <p>3/4 oz eq = 94 gm or 3.3 oz</p> <p>1/2 oz eq = 63 gm or 2.2 oz</p> <p>1/4 oz eq = 32 gm or 1.1 oz</p>
<b>GROUP H</b>	<b>OZ EQ FOR GROUP H</b>

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<ul style="list-style-type: none"> <li>• Cereal Grains (barley, quinoa, etc)</li> <li>• Breakfast cereals (cooked)<sup>5,6</sup></li> <li>• Bulgur or cracked wheat</li> <li>• Macaroni (all shapes)</li> <li>• Noodles (all varieties)</li> <li>• Pasta (all shapes)</li> <li>• Ravioli (noodle only)</li> <li>• Rice (enriched white or brown)</li> </ul>	<p>1 oz eq = 1/2 cup cooked or 1 ounce (28 g) dry</p>
<b>GROUP I</b>	<b>OZ EQ FOR GROUP I</b>
<ul style="list-style-type: none"> <li>• Ready to eat breakfast cereal (cold, dry)<sup>5,6</sup></li> </ul>	<p>1 oz eq = 1 cup or 1 ounce for flakes and rounds</p> <p>1 oz eq = 1.25 cups or 1 ounce for puffed cereal</p> <p>1 oz eq = 1/4 cup or 1 ounce for granola</p>

<sup>5</sup> Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; and meals served to children ages 1 through 5 and adult participants in the CACFP. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

<sup>6</sup> Cereals must be whole-grain, or whole grain and enriched or fortified cereal.

### Criteria for Determining Equivalent Minimum Weight of a Serving

The following criteria must be used in determining the minimum weight of Grains items. In calculating the reference servings, the amounts of key nutrients for each item were averaged from the available data for items of that type. It was determined that the key nutrients in the items were basically furnished by the enriched flour and/or whole grain ingredient. Food items have been divided into groups according to the product weight, which will yield the enriched flour and/or whole grain equivalent of a 28 gram (or 1.0 ounce slice of white bread. Within each group, all items have approximately the same nutrient and grain content per serving. The minimum weight of each group is based on the enriched flour and/or whole grain content of the product (exclusive of fillings, toppings, etc.).

- Crediting of foods will be determined by the total amount of enriched flour and/or whole grain in the recipe divided by the number of servings the recipe yields. Bran and germ are calculated in the same manner as enriched or whole grain meal and flour.
- One-fourth of a serving is the smallest amount allowable to be credited toward the grains requirement.

### Definitions

**“Breakfast Cereal”** is any cereal grain served in a cold and dry form. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

**“Cereal Grain”** is the edible part of a whole grain that has been processed for consumption.

**“Enriched”** means that the product has had specific nutrients (thiamin, riboflavin, niacin, folic acid, iron and sometimes calcium) added to it that were lost during processing. The taste, texture and appearance are not altered.

**“Fortified”** grains or grain products have had extra nutrients (that is, more than those required to meet the definition of “enriched”) added back into them after processing.

**“Flour”** is the product derived by finely grinding and bolting (sifting) wheat or other grains (such as corn, oats and rice), seeds, legumes and even vegetables.

**“Meal”** is the product derived by coarsely grinding grains (wheat, corn, oats, etc.)

**“Refined Flour”** is flour that has been processed and contains only one or two parts of the kernel and/or contains parts of the kernel in smaller proportions than grown naturally in the field.

**“Whole grain”** is flour or other products made with all three parts of the grain’s kernel (endosperm, bran and germ) in the same proportion in which they grow naturally in the field.

**“Whole grain- Rich”** are foods that contain 100-percent whole grain or contain a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50-percent is whole grain. Whole grain-rich products must contain at least 50-percent whole-grains and the remaining grain, if any, must be enriched.

**“Whole wheat”** is a whole grain product made solely from wheat kernels (as opposed to oat, corn, rye or any other type of grain).

### **Additional Reminders Regarding Grains**

- Do not include grain food items offered at breakfast as contributing to the required number of servings of grain per week required by the school lunch pattern.
- When a choice of two or more items which contain different amounts of grains is offered on a serving line, credit for the larger sized grain should be given for the day. For example, if the menu offers an entrée choice of Hamburger on Bun (two grains) or Breaded Chicken Nuggets (one grain), the entrée should be counted as offering two grains (assuming the portion sizes equal two bread servings).
- When any cereal grain is used as an ingredient in a grain product, use the serving size given for the appropriate grain group. For example, a serving of oatmeal bread should weigh 25 grams (Group B).
- Whole grain rich foods should be offered whenever possible.

### **Common Problems with the Grains Component**

It is often noted on an administrative review that a menu did not offer one serving of grain per day and/or eight servings of grains per week. Specific problems and recommended solutions are provided below.

1. Commercially prepared grains items are served and credited as contributing to the school lunch pattern before it has been determined whether the items are enriched and/or whole grain-rich. Examples include frozen pancakes and waffles, refrigerated rolls, taco shells, tortillas and tortilla pieces, dry biscuit and muffin mixes and prepared pizza crusts.

Solution: Secure an ingredient statement from the individual product wrapper, bulk packing container, or manufacturer demonstrating that the item contains whole grain and/or enriched flour and/or meal. Each serving must contain at least 16 grams of enriched flour and/or meal or whole grain to be credited as one full serving of grains or each serving must meet the minimum serving sizes.

Obtain a product analysis sheet from the manufacturer or obtain information using the Product Analysis Sheet for a Grains Product (Form 19-D) which is provided at the end of this chapter. Refer to the section entitled, "Purchasing Food for Child Nutrition Programs" provided later in this chapter of the *Program Reference Manual* for additional information.

2. A smaller-sized portion of the menu item being credited daily as a grain is served in the lower grades, thus reducing the serving size to less than one full serving. Examples of a grain for which the serving sizes might be commonly reduced for students in the lower grades include rice, macaroni, spaghetti, taco shells, and crackers.

Solution: When reducing the portion size of a grain menu item to less than a full-sized serving for students in the lower grades, be certain that the item is not the sole source of grains in the daily menu. Less than a full-sized serving of grains may be counted toward the weekly requirement, but the daily minimum requirement is one full serving of grains.

### **Foods That May Not Be Credited as Grains**

Certain snack-type foods, such as cheese-puffs, popcorn, and potato chips, do not qualify as grains and may not be credited toward meeting the grains requirement in meals served under the CNP. See the *Food Buying Guide*, Section 5 – Other Foods for specific items that are not creditable toward meeting the meal components but that may be served as extra food items.

### **Purchased Grains Products**

Form 19-D entitled Product Analysis Sheet for a Grains Product is a sample form which may be used to obtain information from manufacturers regarding product formulations. This will enable the SFA to determine how to credit these purchased products toward the grains requirement.

## **Milk Component**

### **Serving Size and Type of Milk Required**

- Students in grades K-12 must be offered eight fluid ounces or half a pint of milk as part of each lunch.
- Schools must offer fluid milk in a variety of fat contents (1% unflavored, fat free flavored, and/or fat free unflavored).
- A choice of flavored or 1% unflavored milk and lactose-free fluid milk may also be offered if desired.
- All milk served must be pasteurized fluid milk and must meet state and local standards for each type of milk.
- The milk must contain vitamins A and D at levels specified by the FDA and consistent with state and local standards.
- To meet the DGA, it is recommended that the fluid milk with the lowest fat and sugar content be offered.

### **Prohibition on Choice of Beverage**

USDA has ruled that a school may not offer juice for free to students who refuse milk, while charging other students who selected milk as part of their meal, an a la carte/special sales price for juice. Such a practice is prohibited because it violates the unit pricing requirement and effectively undermines the milk component as an integral part of the reimbursable meal by offering a substitute beverage at the unit price.

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A similar practice has also been observed in schools that mistakenly offer a choice among milk, tea and fruit-flavored drinks with “beverage” erroneously considered to be a meal component. As discussed above, schools are prohibited from charging extra for an alternate beverage for students who accept milk, while giving away an alternate beverage to those who refuse milk.

In the policy agreement, schools agree to price lunches as a unit. Schools using the Food Based menu planning systems agree to offer five food items at a locally established unit price for lunch (and to offer four food items at a given breakfast unit price). The school meal patterns specify fluid milk as a component; the only substitutions allowed are for documented medical reasons. Refer to Chapter 21 – Students with Special Dietary Needs provided in this *Program Reference Manual* for additional information on providing alternatives for students with allergies, intolerances and disabilities.

Regulations permit any of the following:

1. To offer milk as an integral part of the meal pattern and to charge a separate (a la carte/special sales) price for juice (or fruit-flavored drink or tea) to all students. Schools are urged to consider the offerings and the pricing structure with the goal of encouraging students to accept and consume a nutritionally balanced, reimbursable meal; or
2. To incorporate juice as a creditable vegetable/fruit item within the reimbursable meal (along with milk, grains, meat/meat alternate, and a second vegetable/fruit source at lunch). As always, the charge for additional servings beyond the unit-priced meal would be subject to the SFA's a la carte special sales pricing policy.

The school's policy should be clearly publicized so that students understand their options. If Offer versus Serve is implemented, the student would still be permitted to decline any one (or two) food item(s) at lunch and one food item at breakfast at the unit price. The student's decision to accept or decline the milk component, as such cannot be used to determine whether the school will charge that student for the juice or other beverage. The regulations continue to permit the establishment to offer different unit prices for different choice menus, provided that all students are offered the same selection regardless of free and reduced-price eligibility. Schools are encouraged to offer choices of food items in order to increase consumption and participation. Refer to the section entitled, “Offer versus Serve” provided later in this chapter of the *Program Reference Manual* for additional information on using Offer versus Serve.

### **Common Problems with the Milk Component**

Problems noted on administrative reviews related to the milk component as well as a recommended solution for each problem are provided below.

1. Milk is placed on the tray of students in lower grades, thus not allowing them to make a choice.

Solution: Allow each student to select his/her own milk.

2. Milk is offered as a choice against another beverage.

Solution: There is no substitute for milk. Therefore, it can never be offered as a choice against another food or beverage.

3. The SFA is temporarily unable to obtain a supply of milk.

Solution: If emergency conditions temporarily prevent an SFA from having milk available, SCDE may approve the service of reimbursable lunches during the emergency period without milk.

## Reimbursable Meal Patterns for Infants

All of the following criteria must be met in order for infant feeding programs to be eligible to participate in the NSLP and SBP in the school:

1. The infants must be enrolled in the SFA.
2. There must be an educational component in their care.
3. There must be an approved application on file for each student for which free or reduced-price reimbursement is claimed.
4. Meals served to these students must comply with the required infant meal patterns.

When planning meals for infants aged birth through 11 months, refer to the following information and use Table 19.8 - Infant Meal Pattern, provided in this chapter of the *Program Reference Manual*. When infants from birth through 11 months of age participate in the NSLP or SBP, infant meals must be served. Foods within the infant meal patterns shall be of texture and consistency appropriate for the particular age group being served and shall be served to the infant during a span of time consistent with the infant's eating habits. Schools are required to serve either breast milk or iron-fortified formula with all reimbursable meals served to infants under one year of age.

### Requirements for Infants 4-7 Months

- For infants four through seven months of age, solid foods are optional and should be introduced only when the infant is developmentally ready.
- Whenever possible the school should consult with the infant's parent in making the decision to introduce solid foods.
- Solid foods should be introduced one at a time on a gradual basis with the intent of ensuring health and nutritional well-being.

### Requirements for Infants 8-11 Months

- For infants eight through 11 months of age, the total amount of food authorized in the meal patterns must be provided in order to qualify for reimbursement.
- Additional foods may be served with the intent of improving their overall nutrition.

### Infant Formula

- The decision regarding which infant formula to feed a baby is one for the baby's doctor and parents/guardian to make together.
- A parent/guardian may elect to decline the offered infant formula and to supply another formula. However, a SFA may not claim reimbursement for meals containing parent-provided formula as the only component.
- Reimbursement is provided for meals that include a food item provided by a parent for a medical reason, such as infant formula, as long as the school supplies at least one required meal component.
- A medical statement is required for all infant formulas that do not meet the definition of "infant formula."
- According to regulations, infant formula means "any iron-fortified infant formula intended for dietary use solely as a food for normal healthy infants served in liquid state at manufacturer's recommended dilution."

**Breast Milk**

- Breast milk, provided by the infant’s mother, may be served in place of infant formula from birth through 11 months of age.
- Meals served to infants younger than eight months that contain only breast milk and no other items may be claimed for reimbursement.
- Meals containing breast milk or infant formula served to infants eight months of age or older may be claimed for reimbursement when other meal component(s) are supplied by the school, provided that the school offered a “formula which meets program requirements” and the decision to decline the offered infant formula was made by the parents/guardian.
- Meal providers must take care to ensure that breast milk is stored and handled properly to prevent possible tainting or spread of disease. In particular, all breast milk given to the provider should have a label stating the child’s name, and providers must make sure that each child receives only breast milk supplied by its mother.

**Table 19.8 – Infant Meal Pattern**

Menu	Birth - 3 months	4 - 7 months	8 - 11 months
<b>BREAKFAST</b>	4-6 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup>	4-8 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup> and 0-3 Tbsp. infant cereal <sup>1,4</sup>	6-8 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup> and 2-4 Tbsp. infant cereal <sup>1</sup> and 1-4 Tbsp. vegetable and/or fruit
<b>LUNCH</b>	4-6 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup>	4-8 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup> and 0-3 Tbsp. Infant cereal <sup>1,4</sup> and 0-3 Tbsp. vegetable and/or fruit	6-8 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup> and 2-4 Tbsp. infant cereal <sup>1</sup> and/or 1-4 Tbsp. meat, fish, poultry, egg yolk, cooked dry beans, or peas; or ½-2 oz. cheese; or 1-4 Tbsp. cottage cheese, cheese food or cheese spread; and 1-4 Tbsp. vegetable and/or fruit
<b>SUPPLEMENTS (Snacks)</b>	4-6 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup>	4-6 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup>	2-4 fl. oz. formula <sup>1</sup> or breast milk <sup>2,3</sup> ; or fruit juice <sup>5</sup> and 0-1/2 bread <sup>4,6</sup> or 0-2 crackers <sup>4,6</sup>

<sup>1</sup> Infant formula shall be iron-fortified.

<sup>2</sup> It is recommended that breast milk be served in place of formula from birth through 11 months.

<sup>3</sup> For some breastfed infants who regularly consume less than the minimum amount of breast milk per feeding, a serving of less than the minimum amount of breast milk may be offered with additional breast milk offered if the infant is still hungry.

<sup>4</sup> A serving of this component shall be optional.

<sup>5</sup> Fruit juice shall be full-strength.

<sup>6</sup> Bread and bread alternates shall be made from whole grain or enriched meal or flour. A serving of this component shall be optional.

## Kindergarten and Pre-Kindergarten Programs

The NSLP and SBP may be operated in schools of high school grade and under. This means that students attending kindergarten and pre-kindergarten programs are eligible to participate in the lunch and breakfast programs. Please refer to [Table 19.1 – Food-Based Meal Pattern Requirements for Breakfast](#) and to [Table 19.2 - Food-Based Meal Pattern Requirements for Lunch](#), provided earlier in this chapter of the *Program Reference Manual* when planning meals for these age groups. At the discretion of the SFA, students attending school on a half-day basis may participate in the lunch and breakfast programs in operation.

### Offer versus Serve

Offer versus Serve (OVS) allows students to decline a certain number of food items in the meal. The goals of OVS are to allow students to choose foods they prefer and to minimize food waste and food costs without jeopardizing the nutritional integrity of the meal. Food service managers report that students like having choices and are more likely to eat food items they choose themselves.

Federal regulations require OVS during lunch in high schools (grades 9-12) but it is optional at lunch in elementary, junior high and middle schools and during breakfast for all grade levels, including high schools. Where OVS is optional, if SFAs choose to implement OVS, they may choose to implement it:

- at some but not all schools within their district and/or
- for some but not all grades within a school and/or
- on some but not all days within a school.

When deciding when and where to use OVS, it is important to consider its benefits and the practicality of implementing it for some but not others.

### Notifying Households

Notifying households of the menu planning system you use and whether or not you have OVS in place is optional. However, it is recommended as it will help parents/guardians better understand your menus and how to guide their children in making healthy decisions. One option is to print a statement such as the following on one or more menus (e.g. the August and January menus) and/or on the school's website.

“We emphasize good nutrition and follow a meal pattern approved by the U.S. Department of Agriculture. The lunch meal consists of five food items from four components each day: meat or meat alternate (such as cheese), vegetable, fruits, grain and milk. To minimize food waste, save money and to encourage healthy choices, we allow students to choose the foods they plan to eat. Three of the foods from the lunch group must be chosen. Breakfast consists of four food components and students are required to take at least three. The price of the meal is the same regardless of whether all foods are taken. We encourage students to choose all items.”

*\* Adapt this as needed for your school or district.*

Another alternative is to send letters home explaining the Food-Based Menu Planning system and Offer versus Serve. Form 19-A entitled [Sample Letter Form 19-A to Explain the “Offer versus Serve” Option for Breakfast \(Food-Based Menus\)](#) and Form 19-B entitled [Sample Letter to Explain the “Offer versus Serve” Option for Lunch \(Food-Based Menus\)](#) have been provided at the end of this chapter of the *Program Reference Manual*. They may be used as is or may be edited to meet your needs.

**Key Points of Offer versus Serve**

1. All of the required components must be offered to all students:

<u>Breakfast (4 components)</u>	<u>Lunch (5 components)</u>
<ul style="list-style-type: none"> <li>▪ 1 serving of milk</li> <li>▪ 1 serving of vegetable</li> <li>1 serving of fruit/juice</li> <li>▪ 2 servings of grain (2 oz. eq.)</li> </ul>	<ul style="list-style-type: none"> <li>▪ 1 serving of milk</li> <li>▪ 1 serving of vegetable</li> <li>▪ 1 serving of fruit</li> <li>▪ 1 serving of meat/meat alternate</li> <li>▪ 1 serving of Grain</li> </ul>

Note: Meat/meat alternate may be substituted for grain after grain minimum is met

2. The serving sizes offered must be at least equal to the minimum required quantities for the age/grade group.
3. Under OVS, a student may decline:
  - Breakfast, all grades: one of the four components
  - Lunch, high school: two of the five components
  - Lunch, younger students: one or two of the components (SFA decision)
4. The minimum number of food items required to make up a reimbursable meal (i.e. three at breakfast and three or four at lunch) must be different food items. For example, if the lunch menu consists of baked chicken, French fries, peaches, a hot roll and milk, a student taking only chicken and two hot rolls would not have a reimbursable meal.
5. Students must take a full portion of the minimum required number of food items (e.g. three food items at breakfast) in order for the meal to be reimbursable.
6. When a full portion of a food item is declined, a smaller portion may be offered. Offering smaller portions is not mandatory and is a local decision. Only full portions of menu items may be credited toward meeting the requirements for reimbursable meals.

For example, if a breakfast menu consisted of ½ cup yogurt (one meat/meat alternate), a blueberry muffin (one Grain), ½ cup cut melon (one vegetable/fruit/juice) and milk, a student could take a full portion of the yogurt, muffin, and milk and a smaller portion of the cut melon and still have a reimbursable meal. However, if they took only the muffin and the milk and a smaller portion of the cut melon, their meal would not be reimbursable because they would only have full portions of two food items.

7. Schools are not required to offer another item if a student refuses one of the food items in the meal. Offering choices, for example a choice between two meat/meat alternates at lunch, is optional. Offer choices when possible, even within only one component such as vegetable/fruit, because it often results in increased customer satisfaction and less food waste. Note, however, that there is no alternate to the fluid milk component. Some schools offer one or more beverages, such as juice in addition to milk. These choices are not interchangeable though since they are in different food groups. A student must be permitted to take milk even if he has also chosen the juice. Any menus posted or published by a school must accurately reflect this.

8. The meal must be priced as a unit. That is, the charge for the meal must be the same whether the student takes the minimum or the maximum number of food items. This means that those students eligible for free meals will continue to pay nothing. Students eligible for reduced-price meals will still pay the current reduced-price charge. All other students will pay the full meal price.
9. In schools providing a la carte/special sales service, as long as all required food components are made available to each student, any combination of food containing the minimum three (or four) required food items of the planned meal may be sold at the unit price and claimed for reimbursement. If students choose less than three (or four) foods that are planned and merchandised as a part of the school meal, they must pay the a la carte/special sales price of those items. A la carte/special sales prices should be set to cover the total cost of each menu item. See [Chapter 7 – Meal Pricing](#) for additional information on establishing a la carte prices.
10. The student must be allowed to decide which food items to decline. The school may not require that certain components/food items (e.g. the meat/meat alternate or milk) be taken by the student.

### **Identifying Components at Breakfast**

When identifying components, consider the following:

1. A component is not the same as a menu item. A menu item is any planned meat/meat alternate, vegetable, fruit or juice, Grain or milk that is named on the menu to be served on a given day. Components make up menu items. A menu item may contain only one component or it may contain more than one component. For example, the following menu items each contain two components (meat/meat alternate and Grains): peanut butter toast, ham biscuit, and egg muffin. A student taking a full portion of any of these menu items would be taking two food items or components. See the section entitled, "[Definition of Terms](#)" and [Table 19.7 - Application of Terms](#) provided earlier in this chapter of the *Program Reference Manual* for additional information and definitions.
2. To count the grain as one of the three components needed for a reimbursable breakfast, a student must take a full serving. To count a meat/meat alternate component, a student must also take a full serving. For example, if a student selected a half slice of cheese toast (½ ounce cheese, ½ slice of bread) no credit would be given to either the meat alternate or the bread. The credit would only be given if the student selected the whole cheese toast (1 ounce cheese, 1 slice of bread).

See [Table 19.16](#) provided below for several examples of reimbursable and non-reimbursable breakfast meals taken by students under OVS.

Table 19.9 – Identifying a Reimbursable Breakfast under Offer versus Serve

**RULE: Student must take at least 3 food items and may not refuse more than 1.**

Foods Selected By Student	Creditable Food Items	Reimbursable?	Explanation
Milk, orange, and toast	3	Yes	Four (4) food items are offered (but we're offering a choice within the grain group.) The student may decline only one (1) food item so they must take at least three (3). They declined the cereal.
Milk, orange, cereal and toast	4	Yes	Each creditable ounce of grain counts as a food item.
Milk, orange and cinnamon roll	4	Yes	Each creditable ounce of grain counts as a food item so the cinnamon roll counts as 2 food items.
Milk, 2 pieces of toast	3	Yes	Two identical grains may be counted as two food items
Cereal, 2 pieces of toast	3	No	A maximum of 2 food items from any one component may be counted

**NOTE: Some cereals credit as 2 ounces (or grain servings) and some credit as 1 ounce. Make sure you ask for and look at the information from your suppliers.**

Foods Selected By Student	Creditable Food Items	Reimbursable?	Explanation
Milk and breakfast pizza	3	No	This counts as one (1) milk and two (2) grains but five (5) food items are being offered and the student may only decline one (1) so they must take at least four (4).
Milk, apple and breakfast pizza	4	Yes	The breakfast pizza counts as two (2) food items so the student has taken a total of four (4) food items.
Apple, juice and breakfast pizza	4	Yes	Each ½ cup of fruit (or vegetable or juice) counts as a food item and the breakfast pizza counts as two (2) food items

**If the menu planner does NOT count meat/meat alternate as a grain...**

Foods Selected By Student	Creditable Food Items	Reimbursable?	Explanation
Milk and breakfast pizza	2	No	If the meat/meat alternate is an "extra" and is not counted in the weekly grain range, the breakfast pizza is only one (1) food item
Milk, apple and breakfast pizza	3	Yes	Breakfast pizza counts as 1 food item but then only four (4) food items are being offered so the student only has to take three (3).
Apple, juice and breakfast pizza	3	Yes	Each ½ cup of fruit (or vegetable or juice) counts as a food item and the breakfast pizza counts as one (1) food item.

### Identifying Components at Lunch

#### Meat/Meat Alternate

The meat/meat alternate may be served in one menu item (for example, 2 ounces of sliced turkey) or in the main dish and one other menu item (for example ½ ounce of beef in beef vegetable soup served with 1 ½ ounces of cheese in a grilled cheese sandwich). If the meat/meat alternate is split between menu items, both items must be taken in order for the meat/meat alternate to count as one of the five food items.

If a student selects only one of the menu items containing meat/meat alternate, the lunch may still be reimbursable if it contains at least three full portions of other food items. For example, a student could take the sandwich, a ½ cup of fruit or vegetable and milk and have a reimbursable lunch because it contains full portions of three food items – bread in the sandwich, fruit, and milk.

### Using Offer versus Serve with Preplated and Prepackaged Delivery Systems

#### Preplated Delivery System

Schools using OVS with a preplated delivery system should inform the students that they may request the server to remove from their plate any item(s) they do not want. The server should either plate the items the student wants or remove from the plate any item that the student does not want. An announcement by the homeroom teachers, posters in the cafeteria, letters sent home (see Form 19-A and Form 19-B) or other suitable announcements should be used, so that all students will understand and know that they have the privilege of refusing any preplated item.

#### Prepackaged Delivery System

To allow students in schools with a prepackage delivery system some choice, these schools are allowed to implement OVS to the extent that is possible as long as students take at least three full portions.

## Purchasing Food for Child Nutrition Programs

Purchasing food for CNPs is a difficult and specialized job. Like all buyers, one must understand the customers' likes and dislikes and be able to recognize value and quality in order to make reliable price comparisons. Unlike other buyers however, the person purchasing for CNPs must understand and be able to purchase products that meet the federal meal pattern requirements for the CNPs.

### Purchasing Commercially Prepared Meat and Poultry Products

One area of particular concern is the procurement of commercially prepared meat and poultry products. It is often difficult to determine how these products contribute toward meal pattern requirements. Important questions that should be asked when purchasing meat and meat alternate products for school lunches include the following:

- What percent fat is in the meat?
- If cooked dry beans are used, what is the volume measure? (Note: Breakfast and lunch requirement for beans is measured by volume, not ounces.)
- What contribution does the total product make toward meeting the lunch requirement?

In order to determine a product’s contribution to the meal pattern, the following information is needed:

- Weight of raw portion
- Percent fat of the raw meat
- Weight of raw meat
- Amount of APP in the product if the product contains APP
- Percent as purchased protein content of the APP

When purchasing commercially prepared products, it is important to specify whether a raw or cooked product is desired. As shown below in Table 19.19 – Comparison of Nutrients in Beef Patties, the nutrient content can vary greatly between a raw product and a cooked product of the same weight.

**Table 19.10 – Comparison of Nutrients in Beef Patties**

Nutrient	RAW Ground Beef Patty (4 oz) <sup>a</sup>	COOKED Ground Beef Patty (4 oz) <sup>b</sup>	Difference between Raw and Cooked Patty
Protein	20.30 g	27.45 g	26.1%
Iron	3.05 mg	3.62 mg	16.0%
Thiamin	0.09 mg	0.10 mg	10.0%
Riboflavin	0.18 mg	0.24 mg	25.0%
Niacin	4.87 mg	6.12 mg	20.5%
Water	15.05%	13.55%	10.0%
Fat	24.05%	23.02%	4.3%

<sup>a</sup> Ground Beef (no more than 24% fat)

<sup>b</sup> Cooking Methods: oven broiled, pan broiled or sautéed

Data derived from Agricultural Handbook No. 456, *Nutritive Value of American Foods*, 1975

**Purchasing Tools**

The buyer has a few tools available to help them. While they all provide some helpful information, it is important to understand the differences between them. Refer to Table 19.11 – Comparison of Product Information Sources shown below to learn more about the differences between the following four sources of product information.

- Food Buying Guide
- CN Labels
- Product Analysis Sheets
- Advertising Literature

**Table 19.11 – Comparison of Product Information Sources**

<b>Information Available</b>	<b>Food Buying Guide</b>	<b>CN Labels</b>	<b>Product Analysis Sheets</b>	<b>Advertising Literature</b>
<b>Description</b>	Manual for CNPs with portion sizes, meal pattern contributions, etc. for many commercially prepared products	Product label that contains a statement which clearly identifies the meal pattern contribution of the product	Documents signed by a company official that describe the product, product's contents and meal pattern contribution(s)	Any printed material that contains varied information about one or more products
<b>Standard Information Required</b>	Yes	Yes	No	No
<b>Reviewed &amp; Monitored by USDA</b>	Yes	Yes	No	No
<b>Carries a USDA Guarantee</b>	Yes	Yes – provides warranty	No	No
<b>Product Identification</b>	Products are all easily identified by detailed descriptions and purchase unit	Each CN labeled product is assigned its own distinct 6-digit identification number.	Product must be identifiable by name, code number, weight, ingredient listing, etc.	No standards
<b>Accepted by SCDE on an SMI Review</b>	Yes	Yes	Yes	No

## Food Buying Guide

The USDA *Food Buying Guide for Child Nutrition Programs* provides information specifically for CNPs on some commercially prepared combination foods that have USDA FSIS standards. Products are divided into five categories:

- Section 1: Meats/Meat Alternates
- Section 2: Vegetables
- Section 3: Fruits
- Section 4: Grains
- Section 5: Milk
- Section 6: Other Foods

In addition to providing information on portion sizes and the purchase amount needed in order to meet the meal pattern requirements for Food-Based Menu Planning systems, the *Food Buying Guide* contains many charts, diagrams, lists and other helpful information.

For additional copies, go to [www.fns.usda.gov/tn/resources/foodbuyingguide.html](http://www.fns.usda.gov/tn/resources/foodbuyingguide.html) or contact:

USDA's Team Nutrition  
3101 Park Center Drive, Room 632  
Alexandria, VA 22302  
Phone: (703) 305-1624  
Fax: (703) 305-2549

## CN Labeling Program

### What is it?

The CN Labeling Program is a voluntary federal labeling program. It helps schools and SFAs using the Food-Based Menu Planning approaches to determine, with confidence, the contribution that commercial products make towards the meal pattern requirements.

### Who runs the program?

The CN Labeling Program is run by the Food and Nutrition Service (FNS) of the USDA in cooperation with the following agencies:

- Agricultural Marketing Service
- Food Safety and Inspection Service
- National Marine Fisheries Service

### How does the program work?

The program requires an evaluation of a product's formulation by review staff to determine its contribution toward meal pattern requirements. It allows manufacturers to state this contribution on their labels. The program provides a warranty against audit claims for purchases of CN-labeled products.

### What products are eligible for CN labels?

- Main dish products which contribute to the meat/meat alternate component of the meal pattern requirements. Examples of these products include beef patties, cheese or meat pizzas, meat or cheese and bean burritos, egg rolls and breaded fish portions.
- Juice and juice drink products which contain at least 50 percent full-strength juice by volume. This includes such products as grape drink, fruit punch, and juice drink bars.

To carry CN labels, eligible products must:

- Be produced under Federal Inspection by USDA or the U.S. Department of Commerce.
- Have the contribution of meat/meat alternate products determined using yields in the USDA *Food Buying Guide for Child Nutrition Programs*.

**Are manufacturers required to CN label products?**

There is no federal requirement that anyone make or purchase CN-labeled products. This purchasing decision is left to the local level. If a CN-labeled product is desired, this must be clearly stated in purchasing specifications.

**What are the advantages of using CN labels?**

- A CN label statement clearly identifies the contribution of a product toward the meal pattern requirements. It reduces exaggerated claims about a product.
- If a SFA purchases a CN labeled product and uses it according to the manufacturer's directions, the SFA has a warranty against audit claims related to meal pattern requirements if the CN label is later found to have errors. (That is, the SFA will not be held responsible for correctly following the claims of an inaccurate CN label.)

**Do CN-labeled products cost more?**

They should not. Cost comparisons between two meat products should be based on the cost per ounce or pound that contributes to the meal pattern requirements, not on the product cost per ounce or pound.

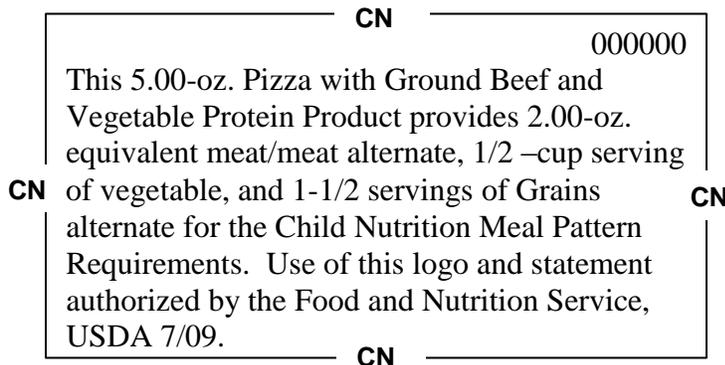
**How do I identify a CN label?**

A CN label will always contain the following:

- The CN logo which is a distinct border.
- The meal pattern contribution statement.
- A six-digit product identification number.
- USDA/FNS authorization
- The month and year of approval

**What does a CN label look like?**

All CN labels follow the format and have the border shown in the sample below.



### Who do I contact with questions?

For additional information about the CN Labeling Program, contact:

U.S. Department of Agriculture  
Food and Nutrition Service  
Child Nutrition Division, Room 632  
3101 Park Center Drive  
Alexandria, VA 22302  
(703) 305-2609

### A CN Label Statement Does Not:

- Assure that a product is “good for children.”
- Assure that a product is “acceptable” to children.
- Suggest that products without CN labels are inferior.
- Assure that a product meets the Dietary Guidelines for Americans.
- Provide enough information to complete a nutrient analysis.

### Federal Inspection

All CN labeled products must be produced under an appropriate USDA or U.S. Department of Commerce federal inspection program to ensure that the label statement accurately reflects the amount of each ingredient used in the product. This will help protect local food service directors from misinformation and will ensure that manufacturers with CN labeled products are competing for sales on a common basis. Federal agencies inspecting these products include:

- Agricultural Marketing Service (AMS) of USDA,
- Food Safety and Inspection Service (FSIS) of USDA, and
- National Marine Fisheries Services (NMFS) of the U.S. Department of Commerce

## Product Analysis Sheets

A product analysis sheet is also sometimes referred to as a manufacturer’s analysis sheet, a letter of certification, fact sheet, or nutritional analysis. It is designed, written, and distributed by each individual manufacturer of a product so no two sheets look exactly the same. However, the type of information provided is generally the same.

### Information Provided on Product Analysis Sheets

A product analysis sheet should provide the following information:

- The ingredients in the product.
- The product’s yield.
- The product’s contribution to the child nutrition meal pattern.
- The amount of cooked product that is needed in order to provide a creditable serving. For example, “If prepared in accordance with the label directions, a  $\frac{3}{8}$  cup serving of XYZ provides  $\frac{1}{4}$  cup vegetable.”

The information provided is based on formulation and/or laboratory testing. It must be signed by an official representative of the manufacturer; not a salesperson.

### Accuracy of Information Provided on Product Analysis Sheets

Although an officer of the company signs it to attest to the printed information, without a CN label, school officials must simply trust that the information provided by the company is correct. USDA does not monitor these documents or verify the accuracy of product analysis sheets and therefore they do not come with a warranty against audits. SCDE will accept signed product analysis sheets for the purpose of completing a nutrient analysis as part of an SMI review. However, the information provided will be reviewed for questionable statements.

### Questionable Language

Some product analysis sheets contain phrases such as “to the best of our knowledge” and/or “contribution of the product is approximately.” A SFA should not accept a product analysis sheet containing such language. Only product analysis sheets that certify the contribution of the product to the meal pattern requirements should be accepted.

### Tracking Products Identified in Product Analysis Sheets

**Q-2** *How can I identify and track a product referred to in a product analysis sheet?*

**A** Compare the product code and the name of the product indicated on the product analysis sheet with the label on the container of the delivered product to ensure that the two are identical. Be certain that a product analysis sheet is on file for any commercially prepared product.

### Advertising Literature

Advertising literature is information provided by the company that may contain valuable information about one or more of the company’s products, but it may not be used to support the contribution that a product makes toward the CN meal patterns.

#### Example of Advertising Literature

#### XYZ Food Products, 1200 Nowhere St., Anywhere, USA 00000

##### New School Lunch Products

*Fully Cooked Charbroiled Beef Pattie* (Product Code 0000)

Ingredients: Beef, Water, Fortified Textured Soy Protein Concentrate, Seasonings

Cooked Portion Size: 2.68 oz                      Case Pack: 40 pcs – 6.7 lb. case

*Fully Cooked Charbroiled Pork Pattie* (Product Code 0000)

Ingredients: Pork, Water, Fortified Textured Soy Protein Concentrate, Seasonings

Cooked Portion Size: 2.65 oz                      Case Pack: 45 pcs – 7.45 lb case

##### Preparation Instructions (from frozen state)

Conventional Oven: Preheat oven to 375°F. Cook for 50 minutes.

Convection Oven: Preheat oven to 350°F. Cook for 35 minutes.

##### Benefits

- Meets all requirements of FNS Notice 219.
- Provides 2 oz. of equivalent cooked lean meat for school lunch.
- Convenient packaging.
- Easy handling and preparation.
- Reduced sodium.

## Chapter 19 – Food-Based Menu Planning

The example of advertising literature shown above not only contains questionable information but also lacks necessary information to determine the product's contribution toward meal pattern requirements. The questionable information includes the following:

1. The ingredient statement lists beef, not ground beef. This means that the patties could contain partially defatted chopped beef and/or cheek meat. The fat level is not restricted to a 30 percent maximum level for these as with ground beef.
2. They claim that the soy protein concentrate used meets all requirements of FNS Notice 219. This automatically makes these products obsolete. Schools should only purchase products that contain APP which meet the more recent identity standards as described in Appendix A of 7 CFR 210.
3. They claim that the products described provide two ounces equivalent cooked lean meat for school lunch programs. The reader has no way of making this determination.
4. No certification statement is provided.
5. The information is not signed by a company official.

### Steps to Take Before Purchasing

**Q-3** *What steps can a buyer take before making a final purchasing decision?*

- A** Before purchasing any meat or poultry product:
- Request a sample of the product and the product label and be certain that the same product is purchased and the same label is received.
  - Check to see if the label has percentage ingredient listing (Request percent labeling on products purchased to know the product's ingredients that contribute to the meal pattern).
  - Check to see if the fat content of the meat is listed on the label.
  - Weigh the actual product to see if the net weight is correct.
  - Check to see if the USDA statement verifying the use of the APP in the CNP is printed on the label (if the product contains APP). This statement is not required to appear on meat and poultry labels but often does.

**Sample Letter to Explain the “Offer versus Serve” Option for Breakfast  
(Food-Based Menus)**

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*

Dear Student:

You have the opportunity to choose only those foods which you intend to eat in the School Breakfast Program. This feature of the School Breakfast Program is designed to give you the opportunity to select the foods that you want to eat and to reduce food waste.

Each day you will be offered a complete breakfast including a serving of:

1. Meat/Meat Alternate  
and/or
2. Grain
3. Fruit/Vegetable
4. Milk

A school breakfast provides approximately one-fourth of your daily nutritional needs. You are encouraged to take all four of the food items offered; however, you may decline one food item. The price per meal remains the same whether you select the minimum of three food items or all four. For example, if the menu is:

Orange Juice (Fruit/Vegetable)  
Cold Cereal (Grain)  
Whole Wheat Toast (Grain)  
Milk (Milk)

You could take all four food items (juice, cereal, toast and milk) or you could select full portions of three items such as:

Orange Juice Cold Cereal Milk	<i>OR</i>	Orange Juice Whole Wheat Toast Milk
<i>OR</i>		<i>OR</i>
Cold Cereal Whole Wheat Toast Milk	<i>OR</i>	Orange Juice Cold Cereal Whole Wheat Toast

Check the menu daily so you will know which items in the school breakfast you want to eat. Through your careful selection of only those foods you wish to eat, you will be helping to conserve food and money – two valuable resources. Enjoy your breakfast!

This institution is an equal opportunity provider

## Sample Letter to Explain the “Offer versus Serve” Option for Lunch (Food-Based Menus)

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

Dear Student:

You have the opportunity to choose only those foods which you intend to eat in the School Lunch Program. This feature of the National School Lunch Program is designed to give you the opportunity to select foods that you want to eat and to reduce food waste. Each day you will be offered a complete lunch including a serving of:

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

The servings of fruit and vegetables may be a combination of a serving of fruit and a serving of vegetables, or two servings of two different fruits, or two servings of two different vegetables.

A school lunch provides approximately one-third of your daily nutritional needs. You are encouraged to take all five of the foods offered; however, you may decline up to two items. The price of the meal remains the same whether you select the minimum of three food items or all five. For example, if the menu is:

Hamburger on a Bun (Meat and Grain)  
Tossed Salad (Vegetable)  
Corn (Vegetable)  
Fruit Cocktail (Fruit)  
Fresh Apple (Fruit)  
Milk (Milk)

...you could take all five food items (hamburger, bun, tossed salad, corn and milk) or you could select full portions of four items or a combination of a minimum of three items such as:

Hamburger		Hamburger		Hamburger
Bun	<i>OR</i>	Tossed Salad	<i>OR</i>	Bun
Fresh Apple		Milk		Corn
Milk				
	<i>OR</i>	<i>OR</i>		<i>OR</i>
Corn		Hamburger on		Hamburger
Tossed Salad	<i>OR</i>	Bun	<i>OR</i>	Bun
Milk		Fruit Cocktail		Tossed Salad
		Corn		

Other combinations could be chosen. You must select three different items. For example, two hamburger patties would count as only one food item. Check the menu daily so you will know which items in the school lunch you want to eat. Through your careful selection of only those foods you wish to eat, you will be helping to conserve food and money – two valuable resources. Enjoy your lunch!

This institution is an equal opportunity provider.

## Product Analysis Sheet for a Meat/Meat Alternate Product

### 1. Product Identification

New Product: No  Yes  Product Currently on Bid: No  Yes  Bid Item No.: \_\_\_\_\_

Product Name: \_\_\_\_\_

Brand Name: \_\_\_\_\_ Product Code No. \_\_\_\_\_

Is product in CN Database? No  Yes  CN Label No. (if appropriate) \_\_\_\_\_

CN Label Crediting: Meat/Meat Alternate: \_\_\_\_\_ Grains: \_\_\_\_\_ Veg/Fruit: \_\_\_\_\_

Establishment No.: \_\_\_\_\_

### 2. Product Description

Product Description: \_\_\_\_\_

\_\_\_\_\_

Ingredients: \_\_\_\_\_

\_\_\_\_\_

Preparation Instructions (to include ingredients to be added and amounts, cooking methods, time and temperature): \_\_\_\_\_

\_\_\_\_\_

List variety(ies) and cuts of meat used in product: \_\_\_\_\_

\_\_\_\_\_

Weight of raw meat per portion (list each variety separately): \_\_\_\_\_

\_\_\_\_\_

Percent of fat in raw meat (list fat in each variety separately): \_\_\_\_\_

\_\_\_\_\_

Weight/measure (as appropriate) of meat alternates (specify): \_\_\_\_\_

\_\_\_\_\_

Source (e.g. soy, peanut), type (e.g. flour, isolate, concentrate), and percent protein in alternate protein product (APP) as purchased: \_\_\_\_\_

---

---

**3. Package Size and Servings per Package**

Package Size: \_\_\_\_\_ grams | lbs. | | oz. | | fl. oz.   
Standard Serving Size (as purchased): \_\_\_\_\_ grams | lbs. | | oz. | | fl. oz.   
Number of Servings per Package: \_\_\_\_\_

I certify that the above information is true and correct, and that a \_\_\_\_\_ ounce serving of the above product (ready for serving) contains \_\_\_\_\_ ounces of cooked lean meat/meat alternate when prepared according to directions.

I further certify that any APP used in this product is authorized as an alternate food in the Child Nutrition Programs and its use conforms to Food and Consumer Service regulations (7 CFR Part 210, Appendix A).

---

Signature \_\_\_\_\_ Date \_\_\_\_\_

---

Printed Name \_\_\_\_\_ Title \_\_\_\_\_

**Manufacturer:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax No.: \_\_\_\_\_

**Broker/Manufacturer Representative:**

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax No.: \_\_\_\_\_

## Manufacturer's Product Information Sheet

Product Name: \_\_\_\_\_

Brand Name: \_\_\_\_\_

Product Code Number: \_\_\_\_\_

Data submitted for this product is on (check one):  "As Served" Basis OR  "As Purchased" Basis

Analysis is based on serving size of (enter value): \_\_\_\_\_ ounce(s) OR \_\_\_\_\_ gram(s)

Preparation method results in: \_\_\_\_\_ % Fat Change (+/-)

\_\_\_\_\_ % Moisture Change (+/-)

---

**Directions:** A value must be entered for each nutrient. If the food item does not contain a specific nutrient, enter zero (0).

Nutrient	Amount per _____ Ounce Serving
----------	--------------------------------

Calories	_____ kcal
----------	------------

Protein	_____ gm
---------	----------

Total Fat	_____ gm
-----------	----------

Saturated Fat	_____ gm
---------------	----------

Carbohydrate	_____ gm
--------------	----------

Dietary Fiber	_____ gm
---------------	----------

Calcium	_____ mg
---------	----------

Phosphorous	_____ mg
-------------	----------

Iron	_____ mg
------	----------

Sodium	_____ mg
--------	----------

Potassium	_____ mg
-----------	----------

Vitamin A	_____ RE*
-----------	-----------

Thiamin (vitamin B1)	_____ mg
----------------------	----------

Riboflavin (vitamin B2)	_____ mg
-------------------------	----------

Niacin (vitamin B3)	_____ mg
---------------------	----------

Ascorbic Acid (vitamin C)	_____ mg
---------------------------	----------

Cholesterol	_____ mg
-------------	----------

\* Retinol Equivalents (RE) = 1/5 International Units (IU)

What source of information was used to calculate the nutrient analysis?

Laboratory Analysis (analytical)

Handbook & Calculations

Combination of 1 and 2

Nutrient Label

Other (please specify): \_\_\_\_\_

## Product Analysis Sheet for a Grains Product

Product Name: \_\_\_\_\_

Manufacturer: \_\_\_\_\_

Product Code No.: \_\_\_\_\_

### 1. Package Size and Servings per Package

Package Size: \_\_\_\_\_ grams  lbs.  oz.

Standard Serving Size: Volume: \_\_\_\_\_ Weight: \_\_\_\_\_

Number of Servings Per Package: \_\_\_\_\_

### 2. Product Description

Product Description: \_\_\_\_\_

Grain ingredients in product (Note: Primary grain ingredient must be enriched or whole grain flour or meal.) \_\_\_\_\_

Weight of grain (The gram weight in one serving of product. Note: It takes 14.75 grams of whole grain or enriched flour or meal, bran or germ; or an equivalent amount of cereal as provided in FCS Instruction 783-1, Rev. 2, to equal 1 serving Grains/Breads. Grains/Breads may be credited in ¼ serving increments.): \_\_\_\_\_

I certify that the above information is true and correct, and that one serving of the above product (ready to eat) contains \_\_\_\_\_ serving(s) of Grains/Breads.

Signature

Date

Printed Name

Title

### Manufacturer:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax No.: \_\_\_\_\_

### Broker/Manufacturer Representative:

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Telephone: \_\_\_\_\_ Fax No.: \_\_\_\_\_

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Andrew Thomas, PhD, SNS  
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# Chapter 20

## Food Production Records

Contributor: Dr. Andrew Thomas

### Purpose of Food Production Records

The food production record serves multiple purposes both prior to and following service. The food production record:

- Provides proof of compliance with federal regulations for Child Nutrition Programs (CNPs).
- Serves as a tool when planning menus and forecasting amounts by providing a record of the amount of food planned and used.
- Helps to communicate the menu to CNP staff.
- Provides valuable information for cashiers to use in determining whether a reimbursable meal has been selected under Offer versus Serve guidelines.

If desired, it may also be used to:

- Assign responsibilities for each menu item.
- Designate serving utensils for each menu item to assure correct portion sizes.
- Assign pre-preparation tasks for future menu items.
- Assign cleaning duties.
- Give instructions for handling leftovers.

### Requirement for Use

Food production records are the **only records** that demonstrate that meals and snacks served and claimed met meal requirements and are entitled to reimbursement. They are therefore required when planning and serving meals and/or snacks under any of the following programs:

- Afterschool Snack Program
- Fresh Fruit and Vegetable Program
- National School Lunch Program
- School Breakfast Program
- Seamless Summer Option
- Summer Food Service Program

Food production records must be used for salad and other theme bars, quick lines, sack lunches, meals or snacks in the classroom and other non-traditional ways of serving meals or snacks in addition to all meals and snacks served in a cafeteria. All School Food Authorities (SFAs) including public schools, charter schools, residential child care institutions (RCCIs) and private/parochial schools **must** use the South Carolina Statewide Food Production Record (Form 20-A) provided at the end of this chapter or other approved production record form. One copy of this form must be completed each day for each serving site.

All food production records must be kept on file for three years plus the current year.

## **Review of Records**

During the Administrative Review (see Chapter 16 – Administrative Review (AR) in this *Program Reference Manual* for additional information), staff from the South Carolina Department of Education (SCDE) will review the SFA's records to evaluate menus and to assure compliance with federal regulations. The reviewer will look at:

- Meals served on the day of the review; and
- Menus and production records for the review day and for previously served meals.

If production records indicate that meals did not meet requirements (for example, components were missing, serving sizes were not adequate, etc.), overclaim will be assessed.

## **Master Production Records**

SFAs with more than one production site (i.e. several schools, each with their own kitchen) are encouraged to develop centrally planned menus and to record the menu, portion sizes, and other critical information on a master copy of the production record for each menu day. This copy can then be distributed to each production site to be completed with site-specific information such as the number of servings to prepare, quantity to prepare, leftovers, and comments. In addition to being an excellent method to communicate menu information to CNP personnel, this makes it easier for busy kitchen managers and increases the accuracy of production records.

# South Carolina Statewide Food Production Record

<b>Date:</b>		<b>Menu #1</b>	<b>Menu #2</b>	<b>Menu #3</b>	<b>Meal/Snack:</b> <input type="checkbox"/> SBP <input type="checkbox"/> NSLP <input type="checkbox"/> ASP <input type="checkbox"/> FFVP	
<b>District:</b>		<b>Entrée:</b>	<b>Entrée:</b>	<b>Entrée:</b>	<b>Students:</b>	
<b>School:</b>		<b>Other menu items:</b>				<b>InKind:</b>
<b>Grades:</b>					<b>Adults:</b>	
<b>Manager:</b>					<b>Other:</b>	
					<b>Total Meals Served:</b> _____	

(1) Menu Items	(2) Recipe #	(3) Meal Contribution	(4) Portion Size			(5) Serving Lines				(6) Total Servings  Planned	(7) Quantity Prepared (Recipe #, lbs, #10can, ea, etc.)		(8) Start Temp &	(9) End Temp &	Menu Planning System: <input type="checkbox"/> Food Based			
			Student	Adult	A la Carte	1	2	3	4		Forecasted	Actual Servings			(10) Servings Leftover	(11) Servings Used	(12) Comments	

Meat/Meat Alternate (M/MA)

Vegetable (V) Fruit/Juice (F)

Grains/Breads (G/B)

Milk (M)



# Instructions for Completing South Carolina Statewide Food Production Record

## Top, Left Box

1. Complete all five lines in this box (date, district name, school name, grades served, and the kitchen manager's name) **before** the menu is served.
2. The most important line is the date because information from inventory records and participation records should all match this date. List the day of the week as well as the calendar date (for example, "Tue., 4-20-10").
3. The grade levels served at the school are important because Food-Based meal pattern requirements vary by grade level (for example, "K-5, 6-8, 9-12").

## Top, Middle Box

1. Complete this box **before** the menu is served.
2. List each entrée item that will be served.
3. If all other menu items will be offered with each different entrée, only write them once. If items to be offered will vary depending on the entrée, then write the menu items to be served with each entrée under the appropriate entrée number.
4. Write **every** item on the menu that will be served as part of the **reimbursable meal** for this day. Condiments do not need to be listed here.

## Top, Right Box

1. Complete this box **after** the menu is served.
2. Indicate whether the production record is for the School Breakfast Program (SBP), National School Lunch Program (NSLP), Afterschool Snack Program (ASP), Fresh Fruit and Vegetable Program (FFVP), Summer Food Service Program (SFSP), or Seamless Summer Option (SSO) program.
3. Record the total number of:
  - Reimbursable student meals served;
  - In-kind meals served on this date (i.e. meals served at no charge to employees);
  - All other adult meals served (i.e. meals paid for by adults); and
  - Any other meals served (for example, to charter schools or Head Start).
4. Add up all of the above and record the total number of meals served on this date.

## Column 1 – Menu Items

1. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.
2. Record all foods prepared and served with a reimbursable meal (including single food items and combination foods). Substitutions and additions must be indicated. If you serve a food on the menu, it must be listed in this column.
3. Do include:
  - All foods listed in the menu area in the "Top, Middle Box" of the food production record;
  - Single food items (for example, chicken strips);
  - Combination foods;
  - Condiments, if served as part of the meal (because they must be included in the nutrient analysis);
  - Desserts, if served as part of the meal (because they must be included in the nutrient analysis);
  - Leftovers (to show that enough food was prepared for that day – use "L/O" after the menu item to indicate that it is a leftover item);
  - Each individual item listed separately; For example:

Menu Items
Chicken Patty
Hamburger Bun
Roast Beef
Cheese, sliced
Hamburger Bun

Not "Chicken Fillet Sandwich" (unless you have a recipe for "Chicken Fillet Sandwich")  
Not "Roast Beef and Cheese Sandwich" (unless you have and use a recipe with a number)

- A clear description of each item. For example...
    - Pepperoni Pizza, not pizza
    - Oranges, not chilled fruit
    - Shredded, cheddar cheese, not cheese
4. Do not include:

- A la carte items and other food and beverages that are not part of the reimbursable meal (for example, “Adult Tea”);
5. If you are using items such as “hamburger buns for all entrees, you can list all of the items together. You do not need to list them twice.

### Column 2 – Recipe Number

1. If the menu item was prepared using a recipe, put a checkmark in this column or, preferably, record the recipe number here.

### Column 3 – Meal Contribution

1. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.
2. The Traditional Food-Based Menu Planning System, in this column you must state how the item you are serving contributes to the meal pattern requirements. Refer to Chapter 19c – Traditional Food-Based Menu Planning in the *Program Reference Manual* for information on the component contributions and portion sizes required for each age/grade group. State the:

Component	Unit of Measure	Example for Column
Milk	(M) in ounces	M = 8 oz
Meat/Meat Alternate	(M/MA) in ounces	M/MA = 2 oz
Vegetables	(V) in cups	V = 1/2c
Fruits/Juice	(F) in cups	F = 1/2c
Grain/Bread	(G/B) in equivalents	G/B = 2

3. Some menu items (for example, Beef Pizza) may be counted toward more than one component. If you want it counted, you must list each meal contribution in this column (for example, M/MA = 2 oz, V = 1/2, F = 1/2 c, G/B = 2).
4. Note that the meal contribution of a food isn’t necessarily the same as the serving size. For example, 1.6 ounces of ham is equal to 1 ounce of countable ham (i.e. 1 oz M/MA).
5. Do not record anything in this column for condiments or for desserts that may not be credited.

### Column 4 – Portion Size

1. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.
2. State the portion size planned. List the portion size in terms that clearly describe the contribution of the menu item to the Food-Based meal pattern.

Component	Unit of Measure	Example for Column
Milk	In ounces	1 ea
Meat/Meat Alternate	In ounces	1 ea or 1 svg (serving)
Vegetable	In cups or scoops	1 ea / #16 or 1 ea
Fruit/Juice	In cups or scoops	1 ea / #16 or 1 ea
Grain/Bread	In ounces or “each”	1 ea
Condiments	In ounces or “each”	3 ea
	– give a range if appropriate	

3. All schools that are using “Offer versus Serve” may plan less than the enrollment if students are expected to choose some but not all menu items. Use historical data to adjust production from one menu service to another.
4. The number of servings planned should be on an item by item basis for students, adults, and A la Carte.

Portion Size		
Student	Adult	A la Carte
1 ea	1 ea	1 ea
250	10	5

### Column 5 – Serving Lines

1. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.
2. Put a checkmark (√) or (X) under each serving line number where the menu item will be served.

### Column 6 – Total Servings Planned

1. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.

2. Add student, adult (including in-kind meals), and A la Carte (special sales) servings together on an item by item basis to complete this column. Note that these numbers serve as the basis for the “Forecasted” amount under “Column 7 – Quantity Prepared.”

### **Column 7 – Quantity Prepared**

1. This column indicates the amounts of food prepared in pounds (lbs), ounces (oz), #10 cans, each (ea) or a recipe number times the number of servings (for example, you need 200 servings and the Recipe # D-32 yields 100 servings, your entry would be Recipe D-32 x 2 ). When in doubt as to how to list a particular food with regard to purchase units, check to see how the food is listed in the *Food Buying Guide for Child Nutrition Programs*.
2. **Forecasted**
  - a. Complete this column **before** the menu is served and preferably **before** food for the menu is ordered.
  - b. State the amount of food (in purchased unites, pounds, cans, cases, etc.) that must be prepared in order to provide the total number of servings planned (as listed in Column 6 – Total Servings Planned).
  - c. Always plan enough to meet the expected number of servings and plan a little more, never less.
  - d. List the pack size and what you are planning to serve or list the recipe number times the number of times you will make the recipe, (for example, you need 200 servings and the Recipe # D-32 yields 100 servings, your entry would be Recipe D-32 x 2).
3. **Actual**
  - a. Complete this column **after** the menu is served.
  - b. If the amount forecasted does not equal the amount prepared, calculate and record the difference in this column. If the amount forecasted equals the amount prepared, this column may be left blank.

### **Column 8 – Start Temp & Time**

1. Record the temperature of each potentially hazardous food at the beginning of the serving period prior to placing the food on the serving line and the time at which each temperature was taken.

### **Column 9 – End Temp & Time**

1. Record the temperature of each potentially hazardous food at the end of the serving period and the time at which each temperature was taken. If there are no leftovers to take the temperature of, this column may be left blank.

### **Column 10 – Servings Leftover**

1. Record the amount of food that was prepared but that was not served to customers. Numbers in this column should be explained in Column 12 – Comments.

### **Column 11 – Servings Used**

1. Record the number of portions served to customers. Count each serving/portion as one serving regardless of the serving size. (That is, a serving size specified for a kindergarten student and a serving size specified for an adult each count as one serving.)

### **Column 12 – Comments**

1. Record any changes or substitutions made in the menu. Include any special circumstances or situations. Provide clarification of any information necessary in this column.

### **Additional Notes**

1. Amounts taken from your inventory should accurately reflect what is on your daily food production record.
2. The amount of items such as hot dogs, hamburgers, etc. should reasonably match the number of buns withdrawn that day.
3. If you forget to take something off your usage, you can take it off your inventory the next day.

**South Carolina  
School Food Service Program Reference Manual  
Contributor: Janice Oates, RD, SNS  
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# Chapter 21 – Students with Special Dietary Needs

## School Food Authority's Responsibility for Special Diets

Regulations issued by the U.S. Department of Agriculture (USDA) for Child Nutrition Programs (CNPs):

- **Require** substitutions to the standard meal requirements for students who are considered disabled and whose disability restricts their diets. Altered meals (i.e. meals with omissions, substitutions and/or alterations such as texture modifications as prescribed by a licensed physician) are reimbursable.
- **Permit** substitutions for other students who are not disabled but who are unable to consume regular program meals because of medical or other special dietary needs.
  - Meals altered due to allergies or intolerances, if prescribed by a recognized medical authority, are reimbursable.
  - Meals altered for any reason other than disability, allergy or intolerance (e.g. ethnic preferences or religious reasons) and those not documented by a recognized medical authority, are only reimbursable if they meet meal pattern requirements for the menu planning system being used (i.e. Food-Based Menu Planning).

## Meal Substitutions for Students with Disabilities

Regulatory provisions requiring substitutions for disabled CNP participants address the requirements of:

- Section 504 of the Rehabilitation Act of 1973;
- 7 CFR Part 15b.3, which provide that no otherwise qualified disabled individuals shall, solely on the basis of disability, be excluded from participating in, be denied benefit of, or be subjected to discrimination under any program or activity receiving federal financial assistance;
- Individuals with Disabilities Education Act (IDEA); and
- The Americans with Disabilities Act (ADA).

School Food Authorities (SFAs) are required to offer program meals to students with disabilities whenever program meals are offered to the general populations served by the programs. SFAs should be aware that the Individual with Disabilities Education Act (IDEA) imposed requirements on states that may affect the service of meals even when such service is not required by the CNP.

For example, the Individualized Education Program (IEP) developed for a child under IDEA may require a meal to be served outside of the regular meal schedule. While the school may not claim these meals for reimbursement, it may use the same funds, food service facilities and/or food service Management Company to provide these meals as it uses to provide program meals.

### **Substitutions in Special Milk and Afterschool Snack Program**

Q-1 *Are substitutions for disabilities required for the Special Milk Program (SMP) and the Afterschool Snack Program (ASP)?*

A There are no reimbursable substitutions allowed in the SMP. For the ASP, substitutions are allowed using the same guidance as for the lunch program.

#### **Definition of “Disabled”**

“Disabled person” is defined as any person who has a “physical or mental impairment which substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.” “Major life activities” are defined as “functions such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, and working.” See Form 21-E or Form 21-F for a complete list of covered conditions.

SFA’s participating in the CNPs is required to make substitutions or modifications to the meal requirements for those students with disabilities who are unable to consume the meals offered to non-disabled students.

### **Disabled Students Without Special Dietary Needs**

Q-2 *Do all children with disabilities have special dietary needs?*

A No. Many children with disabilities have no special dietary needs. They can eat the same meals as other children participating in the Child Nutrition Programs.

#### **Accessibility for Disabled Students**

Where existing food service facilities are not completely accessible and usable to the disabled student, assistance should be provided. The SFA is responsible for the accessibility of food service sites and to provide aides where needed. SFA’s must provide food services in the most integrated setting appropriate to the needs of all students. The SFA must ensure that students with disabilities participate with students who are not disabled to the maximum extent appropriate to the needs of the disabled persons.

As with additional costs of substituted foods, any additional costs for adaptive feeding equipment or for aides are considered allowable costs; although no additional CNP reimbursement is available. Sources of supplemental funding may include special education funds (if specified in the student’s IEP or 504 plan), the SFA’s general account, or the nonprofit school food service account.

### Helping Disabled Students Eat

Q-3 *After the special meal has been provided, who is responsible for assisting with feeding if the child cannot feed himself/herself?*

A Providing assistance with feeding is the school's responsibility. It is not the responsibility of the food service manager. Many schools and institutions will already have aides available to provide this service as part of the child's total care plan.

### Cooperation

When implementing these guidelines, food service personnel should work closely with the parent(s) or guardian(s) and with all other school, child care, medical, and community personnel who are responsible for the health, well-being and education of students with disabilities or other special dietary needs.

Parents and guardians are encouraged to take some of the responsibility by participating in the planning of special meals for their child. Their involvement should be based on food substitutions recommended by the child's physician, availability of the special foods and the reasonableness of the preparation.

### Documentation of Disability

Use of the following forms to notify households to provide diet instructions for a student with a disability is recommended. Annual updates to diet instructions are also recommended but not required.

- Initial Letter to Parent/Guardian explaining Requirements for Special Diet Instructions (Form 21-A),  
OR
- Letter to Parent/Guardian Requesting Update of Special Diet Instructions (Form 21-C)

The SFA should also provide parents or guardians with:

- Letter to Physician/Medical Authority Requesting Instructions for Meal Substitutions for Disabilities, Allergies or Intolerances (Form 21-D)  
AND
- Medical Statement for Student Requiring Special Meals Due to Disability (Form 21-F)

A licensed physician determines whether a student has a disability that restricts his or her diet on an individual basis. The physician's medical statement of the student's disability must be based on the regulatory criteria for disability/handicap and contain a finding that the disability restricts the student's diet. These forms provide information to enable the physician to correctly assess whether an individual's disability meets the regulatory criteria.

In cases where SFA staff has consulted with the physician issuing the statement and it is still unclear whether the student meets the definition of "disabled," the SFA may consult the South Carolina Department of Education (SCDE), Office of Nutrition Programs for guidance at (803) 734-8188.

The medical statement (i.e. Form 21-F) should be updated whenever the doctor changes the student's diet and preferably at the beginning of each school year. Diet modifications should not be made by the SFA unless the statement with the required information is on file. Current statements must be maintained and are subject to review by SCDE staff.

Guidelines for special diets must be completely and clearly written because few SFAs have staff trained in special diet management. Certain situations may require the services of a registered dietician to assist in implementing the medical statement for some therapeutic diets.

Generally students who are obese or have food allergies or intolerances do not have a disability/handicap. SFAs are not required to make substitutions for them. Those types of requests for special diets are discussed later in this chapter. However, if a physician determines that food allergies result in severe life-threatening reactions (anaphylactic reactions – a sudden inability to breathe), or the obesity is severe enough to substantially limit a major life activity, the health condition meets the definition of disability/handicap and the food service personnel must make the substitutions prescribed by the physician.

### **Types of Disabilities**

Q-4 *What types of disabilities may call for meal modifications?*

A Cerebral Palsy, Cystic Fibrosis, Down's syndrome and Spina Bifida are among the disabilities that may require changes in food texture or caloric modifications. Diabetes may require control of calories and/or carbohydrates. Children with disabilities who have difficulty chewing and swallowing may need the physical characteristics of their foods changed. Menus may need modification to include softer foods; for example, cooked rather than raw carrots. Some foods may need to be chopped, ground or blended. See Form 21-E or Form 21-F for a complete list of disabilities.

### **Requirements of Medical Statement from Physician**

On a case-by-case basis, a student with disabilities shall be provided substitutions in foods **only** when supported by a statement signed by a physician licensed by the state. The supporting statement shall identify:

- The individual's disabling condition and an indication of how the disability restricts the student's diet.
- The major life activity affected by the condition.
- The food or foods to be omitted from the child's diet and the food choice or choice of foods that must be substituted.

For example, if the disability would require caloric modifications or the substitution of a liquid nutritive formula, this information must be included in the statement. If the disabled student requires only textural modification(s) to the regular meals, this information must be included in the statement. The purpose of the statement is to assist the SFA in providing the appropriate

textural modification(s). Unless otherwise specified by the physician, the meals modified for texture will consist only of food items and quantities specified in the regular menus.

When the food service personnel receive the letter from the physician listing foods that are to be omitted and foods that are to be substituted, they are required to:

- Abide by the determination of the physician.
- Make a reasonable effort to comply with diet modification.
- Make dietary substitutions only as directed by the physician's written instructions.

### **Providing Special Meals at a Parent's Request**

Q-5 *May a SFA provide a special diet at a parent's request without a letter from the recognized medical authority or physician?*

A No, if the meal does **not** meet menu planning requirements. Meals that do not meet menu planning requirements are only reimbursable if supported by a physician or recognized medical authority. The SFA should not serve modified menus to students with disabilities without a letter from a physician.

Yes, if the meal **will** still meet all menu planning requirements. For example, the parent could request that the child be offered USDA approved soy milk which is nutritionally equivalent to fluid cow's milk. Have the parent/guardian use Forms 21-B, 21-G and 21-I to request an acceptable substitute to fluid cow's milk. Note that instructions from a recognized medical authority are always preferred and SFAs have the right to require them.

### **Meal Substitutions for Students with Food Allergies or Intolerances**

The SFA may, at its discretion, make substitutions for individual students who are not "disabled persons" but who are unable to consume a food item because of medical or other special dietary needs. Such substitutions may only be made on a case-by-case basis when supported by a statement signed by a recognized medical authority. In these cases, the recognized medical authority may be a physician, physician's assistant, or nurse practitioner.

SFA's are not required to make substitutions for students whose conditions do not meet the definition of "disabled person." For example, individuals who are overweight or have elevated blood cholesterol generally do not have a health condition that meets the definition of a "disabled person" and thus SFAs are not required to make meal substitutions for them. In fact, in most cases, the special dietary needs of non-disabled participants may be managed within the normal program meal service when a well-planned variety of nutritious foods is available to students, and/or Offer versus Serve is available and implemented.

Use of the following forms to notify households to provide diet instructions for a student with food allergies or intolerances is recommended. Annual updates to diet instructions are also recommended, but not required.

- Initial Letter to Parent/Guardian Explaining Requirements for Special Diet Instructions (Form 21-A)  
OR

- Letter to Parent/Guardian Explaining Requirements to Omit Fluid Cow's Milk (Form 21-B)  
OR  
Letter to Parent/Guardian Requesting Update of Special Diet Instructions (Form 21-C)

The SFA should also provide parents or guardians with:

- Letter to Physician/Medical Authority Requesting Instructions for Meal Substitutions for Disabilities, Allergies or Intolerances (Form 21-D)  
AND
- Medical Statement for Student Requiring Special Meals Due to Food Allergy or Intolerance (Form 21-E)  
OR
- Request to Omit Fluid Cow's Milk (Form 21-G)

For students without disabilities, the medical statement must include, at a minimum, all of the following:

- An identification of the medical or other special dietary need that restricts the participants diet (i.e. allergy, intolerance or religious/ethical/cultural reasons).
- The food or foods to be omitted from the child's diet.
- The food or choice of foods that may be substituted.

The Medical Statements (i.e. Forms 21-E and 21-F) and the Request to Omit Fluid Cow's Milk (Form 21-G) should be updated whenever the student's diet needs to be changed and preferably at the beginning of each school year.

### **Milk Substitutions**

Milk substitutions for students who have a life-threatening food allergy or other "disability," (as previously defined in this chapter) that is confirmed by an IEP and/or physician's statement should be determined by instructions provided by the physician.

Effective with the 2009-2010 school year, new USDA policy guidelines apply for students who do not have a disability. A parent/guardian and/or physician may request (in writing) a milk substitute for any other medical or special dietary need, including but not limited to a non-life-threatening milk allergy/intolerance or vegan diet, as well as religious, cultural, or ethical reasons.

In these instances, a milk substitute may be provided at the discretion of the SFA. SFAs should be consistent in the response to these types of requests. If a school chooses to honor a substitution request and operates under Offer versus Serve provisions, then milk does not need to be served to the student in order for their meals to be reimbursable. If the school does not use Offer versus Serve, then an acceptable milk substitute (to be chosen by the SFA) must be provided. The SFA is under no obligation to provide multiple choices of milk substitutes.

Water and juice are not acceptable, reimbursable milk substitutes, even if previously approved and/or specified on a statement provided by a parent/guardian and/or physician. Lactose-free milk is an acceptable substitute, where practical. USDA only provides nutritional standards for milk substitutes and does not provide any list of actual products.

### Reimbursement and Availability of Food Substitutions

Reimbursement for meals served with an authorized substitute food to disabled students or to students with other medical or special dietary needs (i.e. those with allergies or intolerances verified by a recognized medical authority), shall be claimed at the same reimbursement rate as meals that meet meal requirements. These meals should be claimed in the category (i.e. free, reduced-price or paid) for which the students are eligible. Any other meals containing substitutions (e.g. for religious or ethnic reasons) may only be claimed for reimbursement if the meal meets all meal pattern requirements for the menu planning system used by the school or SFA.

SFAs “may not discriminate on the basis of disability” and “shall serve special meals at no extra charge to students whose disability restricts their diet.” SFAs that choose to provide substitutions for other medical reasons or special dietary needs (i.e. allergies or intolerances) are also responsible for any additional costs. However, additional costs associated with providing substituted foods are considered allowable program costs.

For students with a disability requiring substitutions, every effort should be made to obtain food substitutions described in the physician’s supporting statement. If the authorized substitute foods are not generally available in the local markets, the parent or guardian may be asked to provide the substitute food item prescribed by the physician.

#### Cost of Snacks

Q-7 *When a physician orders a snack outside of the meal period for a student with a disability, must the food service program bear the cost of the snack?*

A The student should be requested to bring the snack from home. However, that may not always be possible for some students. The cost of providing the snack for the student is an allowable cost to the food service program. The cost of the snack could also be paid from special education funds or other school funds.

#### Menu Documentation

SFAs are not required to document the special meals on menu production records. The special menu does not have to meet the component requirements for schools and SFAs using the Food-Based menu planning system.

#### Discontinuation of Special Diet Instructions

For some students, special diet orders are temporary. When a menu order is discontinued, the parent should ensure that the SFA is notified. Form 21-H, Discontinuation of Diet Instructions for Allergies, Intolerances or Disabilities or Form 21-I, Discontinuation of Fluid Cow’s Milk Omission can be used to document that the student is no longer in need of special school meals.

## Chapter 21- Students with Special Dietary Needs

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### Resources

For additional information refer to the guidance issued by the United States Department of Agriculture (USDA), *Accommodating Children with Special Dietary Needs in School Nutrition Programs: Guidance for School Food Service Staff*. It contains detailed information on school food service staff's responsibility in relation to special needs and disabled students. It was mailed to all SFAs in South Carolina and may be accessed at [www.fns.usda.gov/cnd/guidance](http://www.fns.usda.gov/cnd/guidance). If you are unable to access it, contact SCDE for assistance at (803) 734-8188.

For information concerning food allergies, contact the Food Allergy and Anaphylaxis Network (FAAN) at 1-800-929-4040 or go to [www.foodallergy.org](http://www.foodallergy.org).

For assistance in planning appropriate menus using acceptable foods from the physician's medical statement, contact the State Office of Public Health Nutrition at (803) 898-0809 or [www.scdhec.gov](http://www.scdhec.gov).

## Initial Letter to Parent/Guardian Explaining Requirements for Special Diet Instructions

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*

<Date>

Dear Parent/Guardian:

You have indicated that your student has a special dietary need that requires modification of the school menu. Federal regulations require the school to receive written instructions from an appropriate medical authority before the school can modify your student's meals. A recognized medical authority must complete one of the following forms to document your student's current special dietary needs.

- **Medical Statement for Student Requiring Special Meals Due to Disability:** If the student has a disability that affects his/her diet, a licensed physician must complete this form.
- **Medical Statement for Student Requiring Special Meals Due to Food Allergy or Intolerance:** If the student has a food allergy or intolerance, a physician or other recognized medical authority (i.e. physician's assistant or nurse practitioner) must complete this form.

The medical authority must list on the form all foods that are to be eliminated from the diet and foods that may be substituted. The appropriate medical statement should be dated no earlier than July 1, <Year>. To ensure your student's special dietary needs are met on the first day of school, return the completed medical statement by <Due Date> to <Contact's Name> at <Contact's Address>.

**IMPORTANT:** Please sign the appropriate medical statement. If the school staff needs additional information to clarify how to carry out the diet prescription, your signature is required for the physician or medical authority to share information with the school.

If you have questions or need assistance, please call <Contact's Name> at <Contact's Phone>.

Sincerely,

<Signature>

<Name>

<Title>

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly.** "The U.S. Department of Agriculture (USDA) prohibits Discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)

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

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

**Letter to Parent Guardian**  
**Explaining Requirements to Omit Fluid Cow's Milk**

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*

<Date>

Dear Parent/Guardian:

You have indicated that your student has a special dietary need due to a medical, religious, ethical, cultural or ethnic reason that requires the omission of fluid cow's milk. Federal regulations require the school to receive written instructions from the parent/guardian or an appropriate medical authority before the school can omit fluid cow's milk from your student's meals. The parent/guardian or a recognized medical authority must complete the following form to document your student's current special dietary needs: Request to Omit Fluid Cow's Milk.

The only milk substitutions allowed are:

- lactose-free milk or
- a nondairy beverage that is nutritionally equivalent to fluid milk and provides specific levels of nutrients as determined by the U.S. Department of Agriculture (USDA).

Please note that if the student has a disability that affects his/her diet, a licensed physician must complete form 19-F, Medical Statement for Students Requiring Special Meals Due to a Disability. The appropriate medical statement should be dated no earlier than July 1, <Year>. To ensure your student's special dietary needs are met on the first day of school, return the completed medical statement by <Due Date> to <Contact's Name> at <Contact's Address>.

If you have questions or need assistance, please call <Contact's Name> at <Contact's Phone>.

Sincerely,

<Signature>

<Name>

<Title>

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## Letter to Parent/Guardian Requesting Update of Special Diet Instructions

Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.

<Date>

Dear Parent/Guardian:

According to our records, during school year <School Year> your student had a special dietary need that required modification of the school menu. Federal regulations require the school to receive written instructions from an appropriate medical authority before the school can modify your student's meals. A recognized medical authority should complete one of the following forms to document your student's current special dietary needs. Annual updates to special diet instructions are recommended.

- Medical Statement for Student Requiring Special Meals Due to Disability: If the student has a disability that affects the diet, a licensed physician must complete this form.
- Medical Statement for Student Requiring Special Meals Due to Food Allergy or Intolerance: If the student has a food allergy or intolerance, a physician or other recognized medical authority must complete this form.

The medical authority must list on the form all foods that are to be eliminated from the diet and foods that may be substituted. The appropriate medical statement should be dated no earlier than July 1, <Year>. To ensure your student's special dietary needs are met on the first day of school, return the completed medical statement by <Due Date> to <Contact's Name> at <Contact's Address>.

**IMPORTANT:** Please sign the appropriate medical statement. If the school staff needs additional information to clarify how to carry out the diet prescription, your signature is required for the physician or medical authority to share information with the school.

If you have questions or need assistance, please call <Contact's Name> at <Contact's Phone>.

Sincerely,

<Signature>

<Name>

<Title>

**Non-discrimination Statement: This explains what to do if you believe you have been treated unfairly.** "The U.S. Department of Agriculture (USDA) prohibits Discrimination against its customers, employees, and applicants for employment on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or if all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by the Department. (Not all prohibited bases will apply to all programs and/or employment activities.)"

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**Letter to Physician/Medical Authority**  
**Requesting Instructions for Meal Substitutions for Disabilities, Allergies or Intolerances**

*Delete this text and title. Print on school letterhead or insert name, address and telephone number of school/SFA.*  
<Date>

Dear Physician or Medical Authority:

To allow the school food service department to comply with the USDA Child Nutrition Program regulations for meeting a student's special dietary needs, information must be provided using one of the enclosed forms. Please select the form to be completed based on the descriptions provided:

1. **Medical Statement for Student with Disability Requiring Special Meals:** A student with a disability is to be provided substitutions in foods only when supported by a statement signed by a physician licensed by the state. A "disabled person" means any person who has a physical or mental impairment which substantially limits one or more major life activities, has a record of such an impairment or is regarded as having such an impairment. The supporting statement must identify:
  - a. The individual's disabling condition and an indication how the disability restricts the child's diet;
  - b. The major life activity affected by the condition;
  - c. The food or foods to be omitted from the child's diet and the food or choice of foods that must be substituted.

**OR**

2. **Medical Statement for Student with Food Allergy or Intolerance:** A school will withhold and, at its discretion, may make substitutions for a student who is NOT disabled but is unable to consume food items because of food intolerances or allergies. A recognized medical authority, such as a physician, physician's assistant or nurse practitioner, must sign a supporting statement. The supporting statement must include:
  - a. An indication that the medical or other special dietary need restricts the child's diet and
  - b. The food or foods to be omitted from the child's diet and
  - c. The food or choice of foods that may be substituted.

Until complete information is received from your office, the student's special diet cannot be implemented. Your timely assistance is appreciated. It is extremely important for the parent/guardian to sign the Medical Statement. If the student's school needs to clarify the diet prescription, the physician or medical authority can provide further information ONLY if the parent/guardian has signed the Medical Statement. Please retain a copy of the completed Medical Statement with your medical records for the student.

If you have questions or need assistance, please call <Contact's Name> at <Contact's Phone>.

Sincerely,

<Signature>  
<Name>  
<Title>

Enclosures: Medical Statement for Student Requiring Special Meals due to Food Allergy or Intolerance  
Medical Statement for Student Requiring Special Meals due to Disability

This institution is an equal opportunity provider.

## Medical Statement for Student Requiring Special Meals Due to Food Allergy or Intolerance

Student Name: \_\_\_\_\_

District: \_\_\_\_\_

Birth Date: \_\_\_\_\_

School: \_\_\_\_\_

Parent Name: \_\_\_\_\_

School Contact: \_\_\_\_\_

Address: \_\_\_\_\_

School Address: \_\_\_\_\_

Phone: \_\_\_\_\_

School Phone: \_\_\_\_\_

**To be completed by a recognized medical authority (i.e. a licensed physician, physician's assistant or nurse practitioner)**

The school is not required to provide substitutions for an allergy or food intolerance, and is permitted to do so **ONLY** when omitted foods and appropriate substitutions are specified by a medical authority. If diet modifications are implemented by the school, they will continue until a medical authority specifies that they should be changed or stopped. Parents/guardians are asked to annually request updated instructions for diet modifications from a medical authority.

- Student has a disability affecting the diet that meets the definition of "disability" as described on the reverse side of this form. If yes, complete Medical Statement for Student Requiring Special Meals Due to Disability.

**Diet Prescription** (check all that apply):

- Milk/Dairy Products Allergy – No fluid cow's milk or any other food product made with cow's milk such as cheese, yogurt, dried milk powder, etc. \* \* \* If student has intolerance to milk and/or milk products, then please complete Form 21-G, Request to Omit Fluid Cow's Milk.
- Other (describe): \_\_\_\_\_
- Food allergies – Please check appropriate box(es):  ingestion  contact  inhalation

**List the specific food(s) to be omitted and food(s) that may be substituted.** If more space is needed for omitted foods or substitutions, please continue on reverse side of form. Specific foods to be omitted and specific foods to be substituted must be listed below or this statement will be returned to the physician/medical authority for clarification.

**Omit Foods Listed Below:**

**Substitute Foods Listed Below:**

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Continued on reverse side

**Medical Statement for Student Requiring Special Meals Due to Food Allergies or Intolerances**  
(continued)

**Comments:**

**Physician/Medical Authority's Certification:**

I certify that the student named on this form needs the prescribed food and/or beverage omission(s) and substitution(s) due to his/her food allergy (ies) and/or food intolerance(s).

\_\_\_\_\_  
Medical Authority's Printed Name

\_\_\_\_\_  
Medical Authority's Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Date

\_\_\_\_\_  
Preparer or Other Contact's Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Date

**Parent/Guardian's Consent**

I hereby give permission for the school staff to make the prescribed food and/or beverage omission(s) and substitution(s) in my child's school meals. Furthermore, should the school staff require additional information to clarify how to carry out the diet prescription or food omissions and substitutions; I hereby give permission for my child's physician/medical authority to provide any additional information necessary to clarify the diet prescription written on this form.

\_\_\_\_\_  
Parent/Guardian's Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Date

**Definition of Disability:**

Federal regulations governing the Child Nutrition Programs provide that schools must make substitutions in breakfasts, lunches and afterschool snacks for students who are considered to have a disability and whose disability restricts their diet.

Under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), a "person with a disability" means "any person who has a physical or mental impairment which substantially limits one or more major life activity, has a record of such impairment, or is regarded as having such an impairment." The term "physical or mental impairment" includes, but is not limited to, such diseases and conditions as:

- Cancer
- Cerebral Palsy
- Drug addiction and alcoholism
- Emotional illness
- Epilepsy
- Food anaphylaxis (severe food allergy)
- Heart disease
- HIV
- Mental retardation
- Metabolic diseases, such as diabetes or phenylketonuria (PKU)
- Multiple Sclerosis
- Muscular Dystrophy
- Orthopedic, visual, speech and hearing impairments
- Specific learning disabilities
- Tuberculosis

The Individuals with Disabilities Education Act (IDEA) includes the following conditions:

- Autism
- Deaf-blindness
- Deafness or other hearing impairments
- Emotional disturbance
- Mental retardation
- Multiple disabilities
- Orthopedic impairments
- Other health impairments due to chronic or acute health problems, such as asthma, diabetes, nephritis, sickle cell anemia, a heart condition, epilepsy, rheumatic fever, hemophilia, leukemia, lead poisoning, or tuberculosis
- Specific learning disabilities
- Traumatic brain injury
- Visual impairment, including blindness which adversely affects a child's educational performance

Major life activities covered by this definition include caring for one's self, eating, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

## Medical Statement for Student Requiring Special Meals Due to Disability

Student Name: \_\_\_\_\_ District: \_\_\_\_\_

Birth Date: \_\_\_\_\_ School: \_\_\_\_\_

Parent Name: \_\_\_\_\_ School Contact: \_\_\_\_\_

Address: \_\_\_\_\_ School Address: \_\_\_\_\_

Phone: \_\_\_\_\_ School Phone: \_\_\_\_\_

### To be Completed by a Licensed Physician:

The school will make diet modifications for a disability **ONLY** when omitted foods and appropriate substitutions are prescribed by a licensed physician. If diet modifications are implemented by the school, they will continue until a licensed physician specifies that they should be changed or stopped. Parents/guardians are encouraged to annually request updated instructions for diet modifications from a licensed physician.

### Disability:

Identify the disability (see definition on back of form) that causes the student to require diet modifications.

Describe the major life activities, affected by the disability, that require diet modifications.

**Diet Prescription:** Check all that apply.

Diabetic meal plan. Please specify \_\_\_\_\_  
\_\_\_\_\_

Gluten-free meal plan. Please omit all products containing wheat, rye, barley and oats.

Modified texture:  Regular  Chopped  Ground  Pureed

Other (describe): \_\_\_\_\_

Modified thickness of liquids:  Regular  Nectar  Honey  Pudding

Other (describe): \_\_\_\_\_

List the specific food(s) to be omitted and food(s) that may be substituted. If more space is needed for omitted foods or substitutions, please attach an additional page.

### Omit Foods Listed Below:

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### Substitute Foods Listed Below:

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**Special Feeding Equipment:** \_\_\_\_\_

Continued on reverse side.

**Comments:**

**Physician's Certification:**

I certify that the student named on this form needs the prescribed food and/or beverage omission(s) and substitution(s) due to his/her disability/disabilities.

\_\_\_\_\_  
Licensed Physician's Printed Name

\_\_\_\_\_  
Licensed Physician's Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Date

\_\_\_\_\_  
Preparer or Other Contact's Signature

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
Date

**Parent/Guardian's Consent:**

I hereby give permission for the school staff to make the prescribed food and/or beverage omission(s) and substitution(s) in my child's school meals. Furthermore, should the school staff require additional information to clarify how to carry out the diet prescription or food omissions and substitutions; I hereby give permission for my child's physician to provide any additional information necessary to clarify the diet prescription written on this form.

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

**Definition of Disability:**

Federal regulations governing the Child Nutrition Programs provide that schools must make substitutions in breakfasts, lunches and afterschool snacks for students who are considered to have a disability and whose disability restricts their diet.

Under Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act (ADA), a "person with a disability" means "any person who has a physical or mental impairment which substantially limits one or more major life activity, has a record of such impairment, or is regarded as having such an impairment." The term "physical or mental impairment" includes, but is not limited to, such diseases and conditions as:

- Cancer
- Cerebral Palsy
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- Emotional illness
- Epilepsy
- Food anaphylaxis (severe food allergy)
- Heart disease
- HIV
- Mental retardation
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- Tuberculosis

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- Specific learning disabilities
- Traumatic brain injury
- Visual impairment, including blindness which adversely affects a child's educational performance

Major life activities covered by this definition include caring for one's self, eating, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning and working.

## Request to Omit Fluid Cow's Milk

Student Name: \_\_\_\_\_ District: \_\_\_\_\_  
Birth Date: \_\_\_\_\_ School: \_\_\_\_\_  
Parent Name: \_\_\_\_\_ School Contact: \_\_\_\_\_  
Address: \_\_\_\_\_ School Address: \_\_\_\_\_  
Phone: \_\_\_\_\_ School Phone: \_\_\_\_\_

**To be completed by a recognized medical authority such as a physician, physician's assistant, nurse practitioner OR by a parent/guardian.**

The school is not required to provide substitutions for a milk allergy, lactose intolerance, or for any other non-medical reason, and is permitted to do so **only** when omitted foods and appropriate substitutions are specified by a recognized medical authority or parent/guardian. If diet modifications are implemented by the school, they will continue until either a recognized medical authority or a parent/guardian specifies that they should be changed or stopped. Parents/guardians are encouraged to annually provide updated instructions for diet modifications from a recognized medical authority or a parent/guardian.

**Dietary Accommodations:** Select one.

**Lactose Intolerance – Please offer student:**

Lactose-free milk     Milk substitute approved by USDA

**OR**

**Milk allergy – Instead of fluid cow's milk, please offer student:**

Milk substitute approved by USDA (Use Form 21-E to list specific omissions and substitutions)

**OR**

**Religious, ethical or cultural reasons – Instead of fluid cow's milk, please offer student:**

Milk substitute approved by USDA

**Certification:**

I certify that the student named on this form needs the prescribed fluid cow's milk omission and substitution(s) due to his/her milk allergy or lactose intolerance(s).

\_\_\_\_\_  
Medical Authority's Signature                      Phone Number                      Date

**OR**

I hereby give permission for the school staff to omit fluid cow's milk and make the above identified substitution(s) in my child's school meals.

\_\_\_\_\_  
Parent/Guardian's Signature                      Phone Number                      Date

## Discontinuation of Diet Instructions for Allergies, Intolerances or Disabilities

Name of Medical Authority: \_\_\_\_\_

Name of Student: \_\_\_\_\_

School: \_\_\_\_\_

I certify that the student named above is no longer in need of special school meals effective on the following date: \_\_\_\_\_.

\_\_\_\_\_  
Signature of Recognized Medical Authority

\_\_\_\_\_  
Date

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
City, State, Zip

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

### Parent/Guardian

I give \_\_\_\_\_ school's personnel permission to contact the medical  
(Name of School)  
authority named above in order to clarify dietary needs for my child.

\_\_\_\_\_  
Parent/Guardian Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Street Address, City, State, Zip

\_\_\_\_\_  
Phone Number

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## Discontinuation of Fluid Cow's Milk Omission

Name of Student: \_\_\_\_\_

School: \_\_\_\_\_

I certify that the student named above no longer needs the omission of fluid cow's milk from school meals effective on the following date: \_\_\_\_\_.

\_\_\_\_\_  
Parent/Guardian's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
City, State, Zip

### OR

Printed Name of Medical Authority: \_\_\_\_\_

\_\_\_\_\_  
Recognized Medical Authority's Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Street Address

\_\_\_\_\_  
Phone Number

\_\_\_\_\_  
City, State, Zip

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**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Keith Ringer

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# Chapter 22 – Competitive Foods Policy

U. S. Department of Agriculture (USDA) regulations limit the availability of some but not all competitive foods and only restrict access in the food service area. However, USDA regulations allow states and local School Food Authorities (SFAs) to establish stricter rules or regulations to control access to any and all competitive foods. As of 2004, 23 states had done so, using a variety of approaches. The South Carolina State legislature has passed regulations regarding competitive foods sold in schools and the School Boards Association has policies required as part of the accreditation process. All requirements are described or referenced in this chapter of the *Program Reference Manual*.

USDA has obtained new authority to establish nutrition standards for all foods and beverages sold outside of the Federal child nutrition programs in schools. **Nutrition Standards for All Foods Sold in School** is authorized by Sections 203 and 208 of the Healthy Hunger-Free Kids Act of 2010. The new regulation is set to go into effect during the 2014-2015 school year. Technical assistance and training will be provided to all SFAs during the 2013-2014 school year to assist in fully implementing the new regulation.

## Food Service Area and Meal Period

USDA policy defines the food service area as areas on school premises where Child Nutrition Program (CNP) meals are prepared, served and/or eaten, to include dining rooms and student “commons” areas. The meal period begins when the first student enters the food service area to eat breakfast or lunch, and ends when the last student leaves the service area after eating breakfast or lunch.

## Competitive Foods

Competitive foods are any foods or beverages served outside of USDA’s meal programs (National School Lunch Program, School Breakfast Program, etc.), regardless of nutritional value. They include foods of minimal nutritional value (FMNV) as well as nonrestricted foods. USDA’s regulations regarding competitive foods are as follows:

- FMNV may **not** be sold in the food service area during the breakfast or lunch period.
- FMNV **may** be sold, unless prohibited by state or local rules or regulations, in other areas of the school campus throughout the school day.
- Nonrestricted foods **may** be sold in the food service area and in other areas of the school throughout the school day, unless prohibited by state or local rules or regulations.
- Proceeds from the sale of all competitive foods must accrue to the food service account, to the school, or to an approved student organization.
- Costs charged to the nonprofit food service account must be both necessary and reasonable. The costs of FMNV purchased for service in the food service area during meal periods are neither necessary nor reasonable, so they are not allowed. In some circumstances, the cost of minor quantities of FMNV used to garnish or enhance a food or menu item is allowable. Any other costs of FMNV for service in the food service area during meal periods are not permitted.

## Chapter 22 – Competitive Foods Policy

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- If money from the SFA's food service account is used to purchase FMNV for sale outside of the meal period(s), money from another source must be deposited in the food service account in an amount sufficient to cover all direct and indirect costs relating to the purchase and service of FMNV. Records documenting the deposit of outside funds must be maintained for five years and must be available for review or audit.

### South Carolina Student Health and Fitness Act

Public and charter schools in South Carolina that serve a K-5 population are subject to additional guidelines on what food and beverages may be sold during the regular school day. For additional information, see [Chapter 18 – Healthy School Environment & Wellness](#).

### Nonrestricted Foods

Although they are competitive foods because they reduce a student's appetite for nutritious, reimbursable school meals, the foods listed below are not restricted by USDA regulations. When permitted by state regulations, they **may** be sold, at the discretion of local school officials, in the food service area during the breakfast and lunch periods. However, revenues from such sales must accrue to the food service account, to the school, or to an approved student organization.

- Ice cream and ice milk
- Water ices that include fruit or fruit juice
- Certain non-carbonated beverages
- Chips
- Flavored (chocolate, strawberry, vanilla, etc.) candies that may contain any of the following: nuts, peanut butter, caramel, coconut, nougat centers, milk-based fillings, or other similar ingredients

See [Chapter 18 – Healthy School Environment & Wellness](#) for additional information on what can be sold in public and charter schools serving a K-5 population.

### Foods of Minimal Nutritional Value (FMNV)

The sale of FMNV is not permitted in the food service area during meal periods because these foods provide less than five percent of the Reference Daily Intake (RDI) for any one of several key nutrients. The four categories of FMNV are:

- **Soda Water** – Includes colas and similar soft drinks, as well as other beverages that are carbonated (produced from either natural or artificial means) with or without any amount of natural or artificial flavoring(s), artificial sweetener(s), added nutrient(s), juice concentrate(s), or single strength juice(s). Also includes with few exceptions, most sparkling waters.

## Chapter 22 – Competitive Foods Policy

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- **Water Ices** – Includes any frozen, sweetened water such as “...sicles” and flavored ice; does **not** include products that contain fruit or fruit juice.
- **Chewing Gum** – Includes any flavored products from natural or synthetic gums and other ingredients that form an insoluble mass for chewing.
- **Certain Candies** – Includes processed foods made predominantly from sweeteners or artificial sweeteners with a variety of minor ingredients that characterize the following types:
  - **Hard Candy** – A product made predominantly from sugar (sucrose) and corn syrup that may be flavored and colored and is characterized by a hard, brittle texture. Includes such foods as sourballs, fruit balls, candy sticks, lollipops, starlight mints, after dinner mints, sugar wafers, rock candy, cinnamon candies, breath mints, jaw breakers and cough drops.
  - **Jellies and Gums** – A mixture of carbohydrates that are combined to form a stable gelatinous system of jellylike character and are generally flavored and colored. Includes such foods as gumdrops, jelly beans, jellied and fruit-flavored slices.
  - **Marshmallow Candies** – An aerated confection composed of sugar, corn syrup, invert sugar, 20 percent water, and gelatin or egg white to which flavors and colors may be added.
  - **Fondant** – A product consisting of microscopic sized sugar crystals that are separated by a thin film of sugar and/or invert sugar in solution. Includes foods such as candy corn and soft mints.
  - **Licorice** – A product made predominantly from sugar and corn syrup that is flavored with an extract made from the licorice root.
  - **Spun Candy** – A product that is made from sugar that has been boiled at high temperature and spun at a high speed in a special machine.
  - **Candy Coated Popcorn** – Popcorn that is coated with a mixture made predominantly from sugar and corn syrup.

### Exemptions to FMNV

USDA periodically reviews food manufacturer’s requests to have food items granted an exemption from classification as a FMNV. Foods that receive an exemption are considered a nonrestricted competitive food rather than a FMNV and may be sold in food service areas during breakfast and/or lunch periods. The list of exemptions is updated too frequently to include in this publication. However, the latest exemptions are available on the South Carolina Office of Health and Nutrition website at <http://ed.sc.gov/agency/os/Nutrition-Programs/>, under “USDA Policies and Memoranda.”

Exempted foods are not endorsed by the Food and Nutrition Service (FNS) of the USDA and their placement on any list of exemptions does not mean they have significant nutritional value. In addition, this exemption should not be perceived as encouragement to purchase these products. Please note that the exemption of one product does not extend to similar products or a family of products. SFA personnel should check the ingredients statement of each exempted food to differentiate between exempted products and similar non-exempted products.

### South Carolina Nutrition Policies

#### State Legislation Regarding School Nutrition and Food Services

Provision 28.100 of the 1990 Appropriations Act requires that the State Board of Education develop nutrition policies for foods available to students during the school day based on the *United States Dietary Guidelines for Americans* (DGA) and the nutritional requirements of the National Child Nutrition Program (CNP).

#### Beginning School Year 1990-1991

All food made available for sale or service to students in the elementary, middle, and junior high schools during the school day<sup>a</sup> should be consistent with the USDA/Department of Health and Human Services (HHS) DGA and the requirements of the CNP (National School Lunch Program, School Breakfast Program, etc.).

#### Beginning School Year 1994-1995

In order to encourage students to adopt and maintain healthy lifestyles which promote wellness and prevent diet related diseases, all schools by school year 1994-1995 should provide only foods and beverages to students during the school day<sup>a</sup> which meet the USDA/HHS DGA and/or nutritional requirements of the CNP.

By the 1994-1995 school year, when a high school operates a canteen, concession stand, or vending program, all food and beverages should be healthy choices as identified by USDA dietary guidance.

<sup>a</sup> School day is defined as follows: Beginning with the breakfast program or when the first bus arrives and through the instructional day.

#### South Carolina School Boards Association

In 1998, the South Carolina School Boards Association (SCSBA) published the Policy and Legislative Update which addressed competitive foods. As explained in the publication, one of the accreditation standards is student services and activities and nutrition falls under this category. To assist districts in developing a policy on competitive foods, the SCSBA developed a model policy with several options (see Form 22-A, Model Competitive Foods Policy from SCSBA).

Note that although this policy states that, “The (*principal/school food supervisor*) is responsible for ensuring that foods from vending machines and/or other non-cafeteria/competitive foods are sold in compliance with federal guidelines, state regulations and district policy,” the policy does not include details of every rule and regulation. Therefore, when adapting this policy for school and district use, it may be helpful to insert information from this chapter into the model policy. For example, the following paragraph could be added:

“Proceeds from the sale of all competitive foods will accrue to the (*food service account, school’s general fund, specific student organization*).”

To view sample competitive foods policies from other districts, go to the South Carolina School Boards Association (SCSBA) web site at <http://scsba.org>.

**Additional Help**

For additional help with writing a policy on competitive foods or to have questions answered about the rules and regulations, please contact one of the following:

Office of Nutrition Programs  
South Carolina Department of Education  
Phone: (803) 734-8188  
Web Site: <http://ed.sc.gov/agency/os/Nutrition-Programs/>

Pat Kinsey, Director of Policy Services  
South Carolina School Boards Association  
Phone: 1-800-326-3679  
Web Site: <http://scsba.org>

# Model Competitive Foods Policy from SCSBA

*Policy*

## COMPETITIVE FOOD SALES/VENDING MACHINES

Code **EFE** Issued **MODEL/06**

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Purpose: To establish the basic structure for the sale of competitive foods at school.

Good nutrition is essential to peak academic performance for students and to long-term health. The district supports nutrition programs and nutrition education as an integral part of a high-quality education.

To ensure that foods served at schools address modern nutritional needs and to protect the health of students, the *(principal/school food supervisor)* will exercise control over the sale of non-cafeteria/competitive food. For purposes of this policy, “competitive food” means any food that is sold in competition with the school lunch or breakfast program.

The district *(will/will not)* permit vending machines and the sale of competitive foods in the elementary schools, middle schools, high schools and career centers in accordance with this policy.

Schools will not offer or sell any foods of minimal nutritional value in the food service area during meal periods. Foods of minimal nutritional value are those which contribute less than five percent of the Reference Daily Intake (RDI) for any one of several key nutrients and are grouped into the following four categories: soda water (which includes all carbonated beverages), water ices, chewing gum and certain candies.

Schools *(will/will not)* operate any vending machines that are accessible to students on any campus from \_\_\_\_\_ to \_\_\_\_\_. *(Board needs to determine the timeframe; for example, the beginning of the school day/breakfast period until the last 10 minutes of the lunch period/end of the instructional day).*

Schools *(will/will not)* offer or sell other non-cafeteria/competitive foods to students on campus from \_\_\_\_\_ to \_\_\_\_\_. *(Board needs to determine the timeframe; for example, one hour prior to the first lunch period to one-half hour after the last lunch period).*

The *(principal/school food supervisor)* is responsible for ensuring that foods from vending machines and/or other non-cafeteria/competitive foods are sold in compliance with federal guidelines, state regulations and district policy.

The board authorizes the *(superintendent/principal)* to close a canteen or discontinue the sale of competitive foods if not properly operated.

Adopted: \_\_\_\_\_

Legal references:

A. S. C. Code of Laws, 1976 as amended:

1. Students Health and Fitness Act of 2005, Sections 59-10-310 through 380 - Nutrition standards.

B. State Board of Education Regulations:

1. R43-168 - Nutrition standards for elementary (K-5) school food service meals and competitive foods.

## **Chapter 22 – Competitive Foods Policy**

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South Carolina School Boards Association (SCSBA)

**South Carolina  
School Food Service Program Reference Manual**

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# Chapter 23 - Student & Parent Involvement

Federal and state regulations require that schools involve students and parents in the National School Lunch Program. In schools with kindergarten through 5<sup>th</sup> grade, food service managers must meet with the 4<sup>th</sup> and 5<sup>th</sup> graders at least twice per year. Student and parent involvement improves the overall acceptance of school meals and increases participation levels. Such activities may include menu planning, enhancement of the school nutrition environment, program promotion, wellness policy, and related community support activities.

## Document Activities

Since involvement of students and parents is a requirement, schools should document all activities. Form 23-A, Documentation of Activities for Parent/Student Involvement & Nutrition Education may be used or the school/School Food Authority (SFA) may document activities using an alternate method of their choice.

## Develop a Plan for Student and Parent Involvement

### Assess Current Activities

The type of parent and student involvement is left to the discretion of the individual school. This gives the school flexibility to plan and implement a program to meet its individual needs. Before designing a program of student and parent involvement, identify existing activities. Are any of the following or similar activities currently being conducted in your school?

- Are menus distributed to students and sent home to parents?
- Are student and/or parent advisory committees participating in planning Child Nutrition Program (CNP) activities?
- Do CNP personnel speak at parent, teacher, student and/or school board meetings?
- Are surveys conducted to determine students' food preferences?
- Is nutrition education taught in the classroom?
- Is the CNP department used as a "learning laboratory" to supplement classroom instruction?

### Determine Needs

Determine if current activities are adequate to involve students and parents in the CNP or if additional activities should be planned. It may be helpful to form a committee of interested parties to assist in assessing the need and planning future actions.

### Collect Resources

There are many resources available for parent and student involvement activities. For a more complete list, see Chapter 31 – Resources, in this *Program Reference Manual*. Some resources that may be of specific interest include the following:

- **Student, parent and other school and community organizations**
  - Parent-Teacher Organization
  - Student Council
  - Student Government Association
  - Site Council
  - Rotary Club
  - Lions Club
  - School Improvement Council
  - C-SHACs
  
- **Nutrition education and promotional materials**
  - The U.S. Department of Agriculture (USDA) distributed *Changing the Scene – Improving the School Nutrition Environment* to all SFAs in 2000. Copies may be obtained (while supplies last) from [www.fns.usda.gov/tn](http://www.fns.usda.gov/tn). This kit provides suggestions for examining your school’s nutrition environment, developing a plan for improvement and putting the plan into action.
  - Team Nutrition
  - *Dietary Guidelines for Americans 2010*
  - [www.MyPlate.Gov](http://www.MyPlate.Gov)
  
- **School and community health and nutrition professionals**
  - School nurse
  - Registered Dietician
  - Food and Consumer Science Extension Agents
  - Department of Health and Environmental Control (DHEC) or county health departments
  
- **Allied Health and Professional Organizations**
  - American Heart Association
  - American Cancer Society
  - Academy of Nutrition and Dietetics
  - School Nutrition Association
  - National Food Service Management Institute
  
- **Media**
  - School newspapers and websites
  - Local radio and TV stations
  - Local newspapers
  
- **Agricultural Producer Organizations** – See Chapter 31 - Resources for contact information
  - National Cattleman’s Beef Association
  - National Dairy Council
  - Others (e.g. wheat, egg, specific fruits and vegetables)

## Chapter 23 – Student & Parent Involvement

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### Plan for Involvement

Establish objectives and goals for a program to promote student and parent involvement that are realistic and consistent with the identified needs. The plan of action should be designed to use existing resources and meet the established goals and objectives. The plan could include:

- Description of activities to be performed;
- List of resources needed to carry out the activities;
- Description of how to use existing resources;
- Timetable for implementing each activity;
- Person(s) responsible for each activity; and/or
- Evaluation procedures to determine the effectiveness of the activities.

In order to effectively implement a program of student and parent involvement, it is essential to:

- Establish communication with all groups who will be affected and/or directly involved;
- Present the plan to these groups; and
- Gain approval and support.

The approval and support of local school officials are vital to an effective program of student and parent involvement. The attitudes and acceptance of the CNP by local school administrators often have a direct impact on students' and parents' attitudes.

### Activities to Involve Students and Parents

Many activities can be implemented to promote student and parent involvement. Activities can be very simple or complex. Work to develop a comprehensive plan consistent with local needs and abilities to involve students and parents in all aspects of program operations. Try some of the activities listed below to involve students and parents in the program.

1. Provide program information in student and parent handbooks or other school enrollment materials.
2. Design creative menus to post in the school and distribute to parents and students. Advertise the day's menu on an attractive menu board. Print menus in the school or local newspaper and include on the school website.
3. Celebrate special occasions with special menus. Examples include holiday meals, ethnic meals, National School Lunch Week, National School Breakfast Week, athletic victories, etc. Coordinate ethnic meals with language studies, social studies, and/or history classes. Have students participate by decorating the dining area, designing costumes, providing music, etc.
4. Invite parents, grandparents, business partners, or other people in the community to have lunch at school.
5. Sponsor a Parents' Night and invite families to enjoy a school meal.
6. Create a dinner theater by serving a meal to accompany a school theatrical production.

## Chapter 23 – Student & Parent Involvement

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7. Plan projects to improve the appearance of the dining area. Use bulletin boards, special holiday or seasonal decorations, and student artwork, etc.
8. Prepare articles and/or pictures for use in the local newspaper, student newsletter and/or school website. Articles might feature menus, meal statistics, special activities, Offer versus Serve, or nutrition information.
9. Write news items for the school and local newspapers, highlighting a nutrition education item for the week or month, or assist students in writing such articles.
10. Supply weekly or monthly news bulletins to parents on the school menus, suggestions for home meals, recipes, marketing and nutritional tips. These bulletins could be placed in local newspapers or printed on the back of lunch menus sent home to parents.
11. Conduct guided tours of the kitchen and serving area for students and parents.
12. Allow classes to plan menus. Before the menu is planned, visit the classroom to discuss requirements and good nutrition principles.
13. Discuss nutrition in the classroom. Plan to evaluate one week's cafeteria menus to determine if they meet the *Dietary Guidelines for Americans 2010*. Evaluate the menus as to variety, texture and color.
14. Have students complete a nutrient analysis of the school lunch menus. Provide a nutrient analysis of the school lunch menus for parents.
15. Serve as a resource person for food and nutrition subject areas. Provide and/or present information on the CNP and nutrition to classes.
16. Sponsor food and nutrition fairs and exhibits with school and community health professionals and/or teachers. Students and parents can assist in planning, organizing, providing publicity or designing and staffing exhibits.
17. Establish a nutrition education resource center in cooperation with the school media specialist and make materials available for checkout to students and school personnel.
18. Establish a Nutrition Advisory Council (NAC) to help with planning activities – menus, nutrition education, decorating and improving the cafeteria environment, etc. See the section entitled, "Nutrition Advisory Councils (NACs)" provided in this chapter of the *Program Reference Manual* for additional information.
19. Form a parent advisory committee from within the local Parent Teacher Association (PTA) or Parent Teacher Organization (PTO) to discuss topics such as school nutrition regulations, , budgets, , food allergies, breakfast in the classroom, the commodity program, school wellness policy, ways of increasing participation, alternate menu items and possible menu changes.
20. Use the child nutrition program as a learning laboratory for science classes in relation to food and food handling.

## Chapter 23 – Student & Parent Involvement

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21. Provide a special training session for student athletes on sports nutrition education.
22. Discuss the CNP and nutrition at student assemblies, PTA/PTO meetings and other meetings of students, parents and teachers.
23. Invite a guest speaker, such as a local health professional, to speak to the student body on nutrition and health.
24. Conduct taste-testing event to evaluate new products and recipes. Students, parents and teachers could serve on the taste-test panel. See Form 23-B, Taste Testers Survey for Elementary School Students and Form 23-C, Let Us Hear From You provided in this chapter of the *Program Reference Manual* for sample taste test forms.
25. Have students or parents complete a food preference questionnaire to determine their likes and dislikes. See the section provided in this chapter entitled, "How to Develop a Food Preference Survey" (p.23-7) and Form 23-D, Sample Customer Survey for Middle and High School Students.
26. Conduct a plate waste survey and discuss with students possible improvements to reduce waste.
27. Sponsor contests to improve school lunch participation, nutrition awareness, etc. Contests could help to select the best student-made nutrition poster, ideas for cafeteria design, recipes, etc. Use rewards that promote good nutrition.
28. Sponsor a student advertising campaign to increase participation in the CNP.

### Nutrition Advisory Councils (NACs)

NACs are student organizations or clubs that provide advice to nutrition programs and fellow students. They can be an excellent resource for the child nutrition program and for other students. A NAC can help by:

1. Assisting with marketing efforts by providing ideas and by decorating the dining area and serving line(s).
2. Providing an opportunity for students to learn about nutrition and health.
3. Serving as a communication bridge between students, administrators, CNP personnel, faculty, parents and the community.

#### How to Form a NAC

To form a NAC, follow these easy steps.

1. Establish a few realistic goals for the NAC to accomplish in the first year.
2. Obtain the support of the principal and other administrators. Be prepared to market your program and to discuss your goals for your program and for the NAC.

## Chapter 23 – Student & Parent Involvement

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3. Enlist the support of the CNP staff. Be prepared to discuss the time commitment required by involvement with the NAC and the advantages of the NAC (for example, assistance with marketing efforts, increased participation, improved communication within school community, etc.)
4. Recruit a faculty member to lead the group (for example, the school nurse, physical education teacher, counselor, classroom teacher, etc.). Someone visible to students can help publicize it and support the efforts of the group.
5. Recruit approximately 10-15 students to serve on the NAC. Members may be of any age. Possibilities include the following:
  - The NAC may be a sub-committee of the Student Council.
  - The principal or school faculty may choose members for the NAC.
  - Student elections may be held to determine who should serve on the NAC.
6. Join the national NAC organization sponsored by the School Nutrition Association (SNA) to obtain a handbook, newsletters, technical support, etc. Call SNA at 1-301-686-3100 for more information.
7. Plan a small budget to meet anticipated NAC expenses each year. NAC activities may include fund raising events that support other NAC efforts.

### Activities for a NAC

NACs can conduct several types of activities and contribute in many ways. Urge students to play meaningful roles though. Steer them away from activities that are just fun and games. Possibilities include the following:

1. Menu Planning – Provide a worksheet and help your student advisors plan menus that reflect the dietary guidelines and new SLP/SPB meal patterns. Be sure to recognize student input by printing their names on the menus or posting them in the dining area..
2. Taste Testing – Have NAC members taste test new products from vendors, school-made products and fresh fruits and vegetables. Discuss the nutritional contribution of the food. Ask for their advice on how to prepare the food and on how to introduce them to the other students.
3. Marketing – Let NAC members develop a marketing campaign for the year, decorate bulletin boards, make announcements over the school PA system, develop advertisements and/or posters, and then evaluate their efforts.
4. Customer Survey – Work with NAC members to develop and conduct a survey. Students may be more likely to complete a questionnaire if conducted by their peers. Ask teachers to encourage and collect responses.

### Rewards for NAC Members

NAC student advisors not only gain new skills but often find their work fun. Still, it's important to reward them in tangible ways. Such recognition keeps commitment high. Here are a few popular ideas.

1. **Publicity** – Everyone likes to see their name in print. List the names of NAC members in school newsletters, local newspapers, on menus, bulletin boards, etc. Print nametags for members to wear at meetings and at an Open House. Present certificates of appreciation at a board meeting.
2. **Special Identification** – Reward group members with logo items such as T-shirts, water bottles, visors, note pads, etc. Limit distribution so they remain “special” and encourage their use as a sign of distinction. Give as “welcome aboard” items or as thank you gifts.
3. **Food** – Provide healthy snacks at meetings and offer taste tests.

## How to Develop a Food Preference Survey

### Design the Survey

- Identify the topics on which you want the students' opinions. Possibilities include the variety of food offered, quality of food, attractiveness of food on the serving line, friendliness of servers and atmosphere in the cafeteria.
- Phrase questions carefully to avoid prompting either a positive or negative response.
- Use a mix of multiple-choice and open-ended questions.
- Ask the students to identify their age, gender and whether they do or do not regularly participate in the CNP in question (i.e. breakfast, lunch, snack, etc.)
- Ask for opinions on only those things that the program is willing to change or implement. For example, do not ask students if they want a particular food available daily if it is not a realistic possibility.

### Administer the Survey

- If necessary, secure approval and support from administrators, teachers and parents.
- Select the most appropriate setting by asking yourself which will reach the broadest group of students and encourage them to take the survey seriously.
- Consider the month, day and time that the survey is to be administered.

### Collect and Combine the Results

Get help if possible. Some SFAs have equipment available to scan computer surveys. Consider asking a math or science class or the NAC to combine the results as part of a project. Have students interpret the results and make recommendations for solving any problems that they identify.

### Share the Results

Report the results to the students so that they know you heard them. Let them know what you plan to do with the new information.

## Chapter 23 – Student & Parent Involvement

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### Plan for Improvement

- Meet with the CNP staff and administrators if appropriate to plan a few changes.
- Make changes gradually.
- Tell the students when you make a change that they recommended just in case they don't notice.

See Form 23-D for a sample customer satisfaction survey for middle and high school students. The National Food Service Management Institute also has a variety of surveys available at reduced prices. Access information at [www.nfsmi.org](http://www.nfsmi.org)

Use Form 23-A, Documentation of Activities for Parent/Student Involvement & Nutrition Education or an alternate method of your choice to document activities each year. Make additional copies of the form as needed and keep the forms on file. Review the success of current activities when planning future activities.

**Documentation of Activities for Parent/Student Involvement & Nutrition Education**

See Chapter 23 – Student & Parent Involvement of the *Program Reference Manual* for information and suggested activities.

\*\*\*\*\*

Target Date \_\_\_\_\_ Actual Completion Date: \_\_\_\_\_

Description of Activity:

Evaluation/Comments:

Number of Attendees: \_\_\_\_\_ Group Type (parents, students, etc.): \_\_\_\_\_

\*\*\*\*\*

Target Date \_\_\_\_\_ Actual Completion Date: \_\_\_\_\_

Description of Activity:

Evaluation/Comments:

Number of Attendees: \_\_\_\_\_ Group Type (parents, students, etc.): \_\_\_\_\_

\*\*\*\*\*

Target Date \_\_\_\_\_ Actual Completion Date: \_\_\_\_\_

Description of Activity:

Evaluation/Comments:

Number of Attendees: \_\_\_\_\_ Group Type (parents, students, etc.): \_\_\_\_\_

# Taste Testers Survey for Elementary School Students

Grade: \_\_\_\_\_

Please put a mark in the box that describes how much you do or do not like each food.

Food: \_\_\_\_\_



Good

O.K.

Not so  
Good

Food: \_\_\_\_\_



Good

O.K.

Not so  
Good

Food: \_\_\_\_\_



Good

O.K.

Not so  
Good

Food: \_\_\_\_\_



Good

O.K.

Not so  
Good

# Sample Customer Survey for Elementary and Middle School Students

## Let Us Hear From You

You can help us provide the very best quality food by taking just a few minutes to complete these questions.

Menu Item: \_\_\_\_\_

	Good	Fair	Unsatisfactory
1. Food appearance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Food taste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Food texture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Food temperature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments or suggestions:

Date: \_\_\_\_\_ Grade: \_\_\_\_\_

**THANK YOU!**

---

## Let Us Hear From You

You can help us provide the very best quality food by taking just a few minutes to complete these questions.

Menu Item: \_\_\_\_\_

	Good	Fair	Unsatisfactory
1. Food appearance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Food taste	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Food texture	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Food temperature	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Comments or suggestions:

Date: \_\_\_\_\_ Grade: \_\_\_\_\_

**THANK YOU!**

## Sample Customer Survey for Middle and High School Students

Please take a minute to give us your feedback. Your opinions are very important to us!

<b>Food Choices &amp; Quality</b>	<b>Very Satisfied</b>			<b>Not Satisfied</b>	
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
Overall, how satisfied are you with the food:					
Quality?	<input type="checkbox"/>				
Appearance?	<input type="checkbox"/>				
Taste?	<input type="checkbox"/>				
Temperature?	<input type="checkbox"/>				
Quantity?	<input type="checkbox"/>				
Choices?	<input type="checkbox"/>				

<b>Customer Service</b>	<b>Very Satisfied</b>			<b>Not Satisfied</b>	
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
Overall, how satisfied are you with the:					
Courtesy and friendliness of the staff?	<input type="checkbox"/>				
Speed of service?	<input type="checkbox"/>				

<b>Cafeteria Environment</b>	<b>Very Satisfied</b>			<b>Not Satisfied</b>	
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
Overall, how satisfied are you with the:					
Cafeteria's cleanliness?	<input type="checkbox"/>				
Cafeteria's appearance?	<input type="checkbox"/>				
Cafeteria's noise level?	<input type="checkbox"/>				
Cafeteria's overall atmosphere?	<input type="checkbox"/>				
Amount of time available to eat?	<input type="checkbox"/>				

<b>Prices</b>	<b>Very Satisfied</b>			<b>Not Satisfied</b>	
	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
Overall, how satisfied are you with the prices charged for:					
Complete meals?	<input type="checkbox"/>				
Individually priced items?	<input type="checkbox"/>				

(Over please)

**Sample Customer Survey for Middle and High School Students, Page 2**

Please tell us about you.

When you eat lunch at school, which items below do you usually take? (Check all that apply.)

- Milk
- Fruit
- Vegetable
- Main dish/entrée
- Bread
- Dessert

How often do you eat lunch provided by the school?

- Every day
- 3 or 4 days a week
- 1 or 2 days a week
- Less than once a week
- Never

How often do you bring lunch from home?

- All the time
- 3 or 4 days a week
- 1 or 2 days a week
- Less than once a week
- Never

How often do you go somewhere else for lunch besides home or school?

- All the time
- 3 or 4 days a week
- 1 or 2 days a week
- Less than once a week
- Never

What ideas or suggestions do you have for improving any aspect of the Child Nutrition Program at your school?

What is your grade? \_\_\_\_\_

What is your name? (Optional) \_\_\_\_\_

**THANK YOU!**

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributors: All

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# Chapter 24 – School Breakfast Program

The School Breakfast Program (SBP) is a federally-assisted meal program which is operated in public and private nonprofit schools as well as residential child care institutions (RCCIs). Due to a joint resolution passed by the South Carolina General Assembly in 1992, all public schools in South Carolina are required to offer the SBP. South Carolina schools and RCCIs provide a nutritious breakfast for approximately 260,000 students in South Carolina each day.

The SBP began as a pilot project in 1966 and was made permanent in 1975. It operates in the same manner as the National School Lunch Program (NSLP). School Food Authorities (SFAs) that participate in the SBP receive reimbursement for each meal served. In return, they must serve breakfasts that meet federal requirements and offer free and reduced-price breakfasts to eligible children.

## Breakfast Requirements and Policies

### Meal Requirements

School breakfasts must meet the *Dietary Guidelines for Americans 2010* which recommend that less than 10 percent of calories should come from saturated fat and zero grams of trans fat (less than 0.5g). In addition, breakfasts must provide one-fourth of the Recommended Dietary Allowance for calories. See [Chapter 19 – Menu Planning Basics](#) of the *Program Reference Manual* for menu planning guidelines and requirements. Local SFAs and schools are responsible for determining the menus, the specific food items served and how they are prepared.

### Meal Charges and Reimbursements

Any child at a participating school may purchase a meal through the SBP. SFAs may charge no more than 30 cents for a reduced-price breakfast. SFAs set their own prices for breakfasts served to students who pay the full meal price, although they must operate their food service as a non-profit program. See [Chapter 7 – Meal Pricing](#) for additional information and guidance on establishing meal prices for students in the paid category and for adult meals.

Most of the support provided by the U.S. Department of Agriculture (USDA) to SFAs in the SBP comes in the form of cash reimbursement for each breakfast served. The reimbursement rates are established annually by USDA and are distributed following their release by the South Carolina Department of Education (SCDE) to all SFAs in South Carolina. They are available at any time at <http://ed.sc.gov/agency/os/Nutrition-Programs/> or by calling the Office of Nutrition Programs, SCDE at (803) 734-8188.

### Serving Breakfast in Alternative Schools

Alternative schools are often considered to be a “program” of another school, rather than a separate school. When a SFA indicates that an alternative school operates as a program of another school, breakfast does not have to be served at the alternative site as long as the students have access to breakfast at the related, “home” school.

Each student may only be claimed once per meal for reimbursement; either at the “home” school or at the alternative school. SFAs should be consistent in how each student is claimed.

## Chapter 24- School Breakfast Program

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### **Offering Breakfast for Preschool/Pre-Kindergarten Children**

Preschoolers and pre-kindergarten students may participate in the SBP. However, if these students do not have access to the regular meal programs, federal regulations allow SFAs to participate in the Special Milk Program in addition to the NSLP and SBP in order to provide them with milk. Refer to [Chapter 29 – Other Food Service Related Programs](#) in the *Program Reference Manual* for additional information on the Special Milk Program.

### **Serving Times for School Breakfasts**

Breakfast is to be served before 10:00 AM, or close to the beginning, of the child's school day. Bus routes need to be coordinated with school start times to be certain that breakfast is available to students who ride the bus as well as to other students. The serving time for breakfast may be altered as needed from one school to another within the same SFA and from one class to another within the same school.

### **Location of Breakfast Serving and Dining Areas**

The school may determine the most appropriate method of dispensing breakfast. It may be served in the cafeteria, in the classroom or from a central area in the school from a portable service area. Regardless of the location of the breakfast service, there must be a point-of-service accountability and consideration of the need for disposal of waste products.

### **Length of Time for Breakfast Service**

The length of service will depend on the menu, the number of students to be served and the location of service (for example, the classroom versus the cafeteria). All students must have sufficient time to eat their breakfast meal.

### **Breakfast When School Starts Late**

Schools should offer breakfast on days with late buses or late starts when it will be two hours or more from the time of the students' arrival until all students have been served lunch. Some students may have had longer bus rides and upset schedules that prevented them from having breakfast at home. Students should be informed about breakfast procedures on late-start days. The school breakfast menu must still meet program requirements. However, it may be simplified (for example, cereal/crackers, juice/fruit and milk) to facilitate quick, easy service.

## **Severe Need Breakfast**

USDA provides additional reimbursement to schools determined to be in "severe need" based on high percentages of students eligible for free or reduced-price meal benefits. The additional reimbursement is to allow those schools serving many low-income students to provide a more substantial breakfast than is required.

To be eligible, existing schools must have served at least 40 percent of lunches free or reduced-price in the second preceding school year. Existing schools will automatically receive the additional reimbursement via the South Carolina Automated Payment System (SCAPS). New schools should contact the Office of Nutrition Programs, SCDE at (803) 734-8188 to find out whether or not they are eligible. Eligibility to participate in the Severe Need Breakfast (SNB) is determined on a school by school basis. SFAs must apply annually to participate in SNB.

### Breakfast Research

A number of studies have reported students are more alert and perform better in class if they eat breakfast.

- Researchers at Harvard Medical/Massachusetts General Hospital in Boston reported that hungry children are more likely to have behavioral and academic problems than children who get enough to eat. At school, hungry children had more problems with irritability, anxiety and aggression, as well as more absences and tardiness. (*Pediatrics*, January, 1998; *Journal of the American Academy of Child and Adolescent Psychiatry*, February, 1998)
- A Tufts University Statement in 1998 titled *The Link Between Nutrition and Cognitive Development in Children* states: “Recent research provides compelling evidence that under-nutrition impacts the behavior of children, their school performance and their overall cognitive development.”
- The *Minnesota Breakfast Study* found that students who ate breakfast before starting school had a general increase in math grades and reading scores, increased student attention, reduced nurse visits and improved student behaviors. (December, 1997)
- USDA’s *School Nutrition Dietary Assessment Study* (1993) showed that School Breakfast Program meals are nutritionally superior in many key nutrients to other breakfasts, including breakfasts at home.
- A 1989 study published in the *American Journal of Diseases of Children* reported that “participation in the School Breakfast Program is associated with significant improvements in academic functioning among low-income elementary school children.”

### Marketing the SBP

To increase participation in the SBP, consider marketing the program. Marketing includes promoting, advertising, and merchandising breakfast products. It involves the following activities:

- Determining what the customer wants and needs.
- Providing products or services that meet those wants and needs.
- Informing the customer that the products and services are available and of the benefits to be gained by using them.
- Selling the products at prices the customer considers being fair.

The National Food Service Management Institute (NFSMI) recommends barriers to SBP participation and strategies to increase student participation in the School Breakfast Program:

### **Barrier 1: Perception that school breakfast is only for free and reduced-price students**

- Make a brochure or flyer for parents and students that can be handed out at orientation.
- Promote breakfast over PA, school radio station, or web site.
- Put a short announcement on the school's answering machine.
- Send press releases to local newspapers or community newsletters.
- Advertise school breakfast in programs for football games, plays, band concerts, etc.
- Ask journalism students to make a video promoting school breakfast.

### **Barrier 2: Negative Child Nutrition Program image**

- Survey students about their food preferences.
- Maintain a positive attitude.
- Invite parents to school for breakfast.
- Enlist the support of teachers.
- Give out free samples of school breakfast items at lunch or during break times.

### **Barrier 3: Lack of time to enjoy breakfast**

- Use a different form of service. Example: hallway vendor cart for a quick-stop breakfast.
- Allow students to eat in the classroom.
- Serve breakfast on the bus.
- Offer breakfast later in the morning.
- Use two serving lines or self-service stations.

## Chapter 24- School Breakfast Program

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### Promotion Ideas

Below are a few ideas from NFSMI to promote the SBP.

- **Teddy Bear Breakfast** – Ask students to bring their favorite stuffed bear to breakfast. Offer teddy bear shaped graham crackers on the menu and give students a picture of a bear to color.
- **Pajama Party** – Ask students and staff to wear pajamas to school. Award prizes to the students and staff members with the most colorful, silliest, or warmest pajamas.
- **Sports Day** – Ask students to wear something with their favorite team’s logo. Invite local sports personalities to have breakfast with the students.
- **Cereal Box Contest** – Ask the cafeteria staff to come up with a silly name for a new cereal. Invite students to enter a contest to design the cereal box. Ask high school art students to judge the boxes. Award small prizes to all contestants and a grand prize to the winner.
- **Backwards Day** – Serve breakfast for lunch and lunch for breakfast (but be sure to observe the meal pattern for the true meal time). Encourage students and staff to wear their clothes backwards.
- **Story Time** – Invite the librarian to read a book at breakfast. Choose a story with a food theme like *Green Eggs and Ham* by Dr. Seuss. Try to serve the same food item for breakfast.
- **Advertise** new food items before serving them for breakfast with posters and “teaser” signs.
- **Wear a costume** and hand out free samples.
- Make the cafeteria the **“place to be”** in the mornings.
- **Use decorations** to give the cafeteria a fun and exciting atmosphere.
- Obtain **promotional material** from outside sources or use artwork created by the students.
- Show **videos or play popular music**, being certain that either is age- or content-appropriate.

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**School Food Service Program Reference Manual**  
Contributors: Andrew Thomas, PhD and Julie Hartwell, PhD  
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# Chapter 25 – Afterschool Snack Program

The Child Nutrition Reauthorization Act of 1998 enhanced nutrition benefits for all children by authorizing the reimbursement of healthy snacks served to eligible children who participate in afterschool care programs. The intent of these provisions is to encourage and assist schools to operate organized programs of care which include education or enrichment activities known to help improve student achievement and/or reduce or prevent children's involvement in juvenile crime or other high risk behavior.

The South Carolina Department of Education (SCDE) is responsible for administering the Afterschool Snack Program (ASP) in South Carolina schools and residential child care institutions (RCCIs).

## Agreement with SCDE

All South Carolina schools and RCCIs wishing to participate in the ASP must provide sufficient information to enable SCDE to determine whether or not the afterschool care program is eligible and, if so, whether or not it qualifies for free reimbursement for all snacks based on area eligibility. (See the section entitled "Snack Reimbursement" in this chapter of the *Program Reference Manual* for additional information.) Upon approval, SCDE will complete and/or amend an agreement with the School Food Authority (SFA) to provide for the requirements of the ASP.

## Eligible Programs

To qualify for reimbursement, afterschool care programs must meet the following criteria:

1. At least one of the attendance centers in the SFA must operate the National School Lunch Program.
2. The SFA must sponsor or operate the afterschool care program. An outside organization can operate the ASP and non-school personnel may work in the program, however, the SFA must retain final administrative and management responsibility for the ASP. Furthermore, the SFA must be the party that enters into the agreement with SCDE and must assume full responsibility for meeting all program requirements. The school may then, if it wishes, arrange with another organization (such as the Parent Teacher Association) to perform the day-to-day operations.
3. The purpose of the SFA's program must be to provide care in afterschool settings.
  - The program is not required to offer formal child care as recognized by a licensing authority.
  - The program must be organized to provide students with regularly scheduled activities in a setting that is structured and supervised. This does not mean the program must occur daily.
4. The program must include educational or enrichment activities.

## Chapter 25 – Afterschool Snack Program

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- Extracurricular activities (such as the school choir, debate team, drama club, etc.) can only qualify to participate if their basic purpose is to provide afterschool care as defined above.
  - Organized athletic programs engaged in interscholastic sports cannot be approved as an afterschool care program under this provision.
  - Programs which include supervised “open to all” athletic activities along with education or enrichment activities may participate. The key is that they are open to all and do not limit membership for reasons other than space or security considerations, or, where applicable, licensing requirements.
5. The program must have a way of determining which students are present on a given day, such as a roster or sign-in sheet. See Form 25-A, *Afterschool Snack Program Roster* provided at the end of this chapter of the *Program Reference Manual* for a sample sign-in sheet that can be used or adapted for use.
  6. All activities must take place **after** the end of the regular school day. Mid-morning and/or mid-afternoon snacks can **not** be provided by the ASP.

### Eligible Sites

Requirements and limitations for sites include the following:

1. The program may be held in a school or a non-school facility.
2. The SFA is not required to be licensed separately to provide day care unless there are specific state or local requirements for this. If the SFA is required, due to state or local requirements, to be licensed, then the license is required for participation in the ASP.
3. All non-licensed sites must meet state and local health and safety standards.

### Eligible Students

Children are eligible to be reimbursed for snacks in the ASP through age 18. If a child’s nineteenth birthday occurs during the school year, reimbursement may be claimed for snacks served to that child for the remainder of the year. Reimbursement may also be claimed for snacks served to individuals, regardless of age, who are determined by SCDE to be mentally or physically disabled.

### Snack Reimbursement

Schools may claim reimbursement for one snack per child per day. Reimbursement rates for the ASP are effective from July 1 to June 30 and are announced annually by the U.S. Department of Agriculture (USDA). They are distributed to SFAs by SCDE at the beginning of each school year. Current reimbursement rates are available from [www.fns.usda.gov/cnd/lunch](http://www.fns.usda.gov/cnd/lunch) or by contacting the Office of Nutrition Programs, SCDE at (803) 734-8188. Reimbursement payments are determined based on the characteristics of each individual program site. Two reimbursement options are available.

## Chapter 25 – Afterschool Snack Program

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### Area Eligibility

If an ASP site is Area Eligible, then all snacks served to students are eligible for free reimbursement, regardless of each child's eligibility for free or reduced-price lunches. In order to qualify as Area Eligible, the ASP site must be located in the attendance area of a school in which 50 percent or more of the enrolled students are eligible for free or reduced-price Child Nutrition Program benefits. For example, if a high school with less than 50 percent of the enrolled students eligible for free or reduced-price benefits is located in the attendance area of a middle school that has 50 percent or more of the enrolled children eligible for free or reduced-price benefits, then the high school's ASP would be Area Eligible. Area eligibility for the ASP will follow the Summer Food Service Program's (SFSP) policies for area eligibility using school data. Schools determined to be area eligible for the SFSP would also be area eligible as afterschool care facilities.

### Individual Eligibility

All sites which are not in areas served by a school in which at least 50 percent of the enrolled children are eligible for free or reduced-price meals must claim snacks using Individual Eligibility. For ASP sites using Individual Eligibility, reimbursement rates are based on the free, reduced-price and paid eligibility status of each individual student served. Each student's eligibility for free or reduced-price snacks must be documented and is determined using the "Free and Reduced-Price School Meals Family Application" form provided in [Chapter 3 – Policy Statement](#) of this *Program Reference Manual*. Accountability procedures must assure that students are not overtly identified as eligible for free or reduced-price snack (for example, through the use of colored tickets). Refer to [Chapter 12 – Counting & Claiming](#) for additional information on approved procedures.

### Claiming Reimbursement When the Child Missed School

**Q-1** *Can an ASP site claim reimbursement for a snack served to a child who did not attend school that day (e.g. the child was ill)?*

**A** Yes, if and only if, the child did participate in an approved afterschool program on that day. Whether or not he/she attended school that day does not matter.

### Pricing and Non-Pricing Programs

Program sites that are Area Eligible are all non-pricing. Sites that use Individual Eligibility may choose to be pricing or non-pricing. These are described below.

#### Pricing Programs

Paid and reduced-price eligible students pay for their snacks. Students eligible for free snacks do not pay. Note that under no circumstances may a school charge children for snacks claimed at the free reimbursement rate. The SFA determines the snack charge for students in the paid and reduced-price categories and reports those charges annually to SCDE on the "Application for Participation" (see [Chapter 3 – Application for Participation](#) provided in this *Program Reference Manual* for additional information). The reduced-price snack charge may not exceed \$0.15 per snack.

#### Non-Pricing Programs

The SFA is reimbursed for snacks at the current free, reduced-price and paid snack rates but students are not charged for the snacks. In non-pricing programs, the cost of the reduced-price and paid snack is recovered from other funding sources. For program sites that are Area Eligible,

## Chapter 25 – Afterschool Snack Program

all snacks are claimed at the free snack reimbursement rate and students are not charged for the snack.

### Times of Operation

The time of day when a snack is reimbursable is based on when an eligible student's scheduled school day ends.

Reimbursement may **not** be claimed:

- For snacks served before or during the student's school day.
- For snacks served on weekends, holidays or during vacation periods.

Reimbursement **may** be claimed:

- For programs that take place only after a student's school day has ended.
- For students in a kindergarten program which ends at noon if the children remain in school to attend an afterschool care program.
- For older students enrolled in schools that have split sessions (i.e. for older students enrolled in the early session who then remain on campus to participate in an approved afterschool care program even though the school continues to operate a later academic session).

### Snack Meal Pattern

The snack meal pattern defines the food components and portion sizes required by USDA regulations (7-CFR-210.10 a (j) and 210 (n)) for a reimbursable snack. The portions shown below are for students ages 6-12. If financial resources are available, larger portions are recommended for older students, ages 13-18 due to their greater food energy requirements.

A reimbursable snack includes two different Food-Based menu components from the four listed below. Juice may not be served when milk is served as the only other component.

1 cup (8 ounces)	Fluid Milk
¾ cup	Vegetable or Fruit (V/F)
1 serving	Grains (G)
1 ounce	Meat/Meat Alternate (M/MA)

For additional information on foods creditable for the above snack components, see [Chapter 19 – Enhanced Food-Based Menu Planning](#) provided in this *Program Reference Manual*.

Although there are several combinations of acceptable snack menus, below are a few sample menus.

Lowfat Chocolate Milk (8 fl oz) .....Milk	Lowfat Milk, unflavored (8 fl oz) ..... Milk
Banana (1 medium) .....V/F	Graham Crackers (.9 oz) ..... G

Apple Juice (¾ cup) .....V/F	Lowfat Flavored Yogurt (4 oz) .....M/MA
Lowfat American Cheese Cubes (1 oz) .M/MA	Sliced Peaches (¾ cup) ..... V/F

Peanut Butter Sandwich

- \* Wheat Bread (.9 oz).....G
- \* Peanut Butter (2 Tbsp) .....M/MA
- \* Jelly (1 Tbsp)

## Chapter 25 – Afterschool Snack Program

Orange Juice (3/4 cup)..... V/F  
Pretzel Sticks (.9 oz) ..... G

Lowfat Milk (8 fl oz) ..... Milk  
Oatmeal Raisin Cookie (2.2. oz) ..... G

Pineapple Chunks (3/4 cup) ..... V/F  
Bagel (.9 oz) ..... G  
with light cream cheese (1 oz)

Apple Juice (3/4 cup)..... V/F  
Tortilla Chips (.9 oz) ..... G  
with salsa (1/4 cup)

Lowfat Chocolate Milk (8 fl oz) ..... Milk  
Raisin Bread (.9 oz)..... G  
with light cream cheese (1 oz)

### Students Refusing Food Items

**Q-2** *May students take only one of the two food items offered for the ASP?*

**A** Yes but if they do, the snack may **NOT** be claimed for reimbursement. For the snack to be reimbursable, the student must take the minimum amounts of the two required components.



**Q-3** *May a student take two of the same item (e.g. two milk cartons) and refuse the other component item (e.g. a banana)?*

**A** In order to have a reimbursable snack, the student must take two different items.

### Monitoring Requirements

Local SFAs are required to monitor each ASP site two times per year. The first of these on-site monitoring visits must occur during the first four weeks that the site is in operation each school year. All reviews completed by the SFA must be fully documented and are subject to audit by SCDE and/or by USDA. Form 25-B, On-Site Review of Afterschool Snack Program, provided in this chapter of the *Program Reference Manual* may be used to conduct and document each visit or local SFAs may develop and use their own similar monitoring form.

### Record Keeping Requirements

SFAs participating in the ASP must maintain the following records and retain them for the current year plus three years.

1. If all snacks are claimed free, documentation must be maintained showing that the site is located in an area served by a school in which at least 50 percent of the enrolled students are certified eligible for free or reduced-price meals.

## Chapter 25 – Afterschool Snack Program

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2. For all other sites, documentation of free and reduced-price eligibility for all children for whom free and reduced-price snacks are claimed must be on file. The “Free and Reduced-Price School Meals Family Application” form provided in Chapter 3 – Policy Statement of this *Program Reference Manual* should be used and filed as documentation of each student’s eligibility status.
3. Documentation of each student’s attendance on a daily basis. Names of participating children must be included in this information. Form 25-A, Afterschool Snack Program Roster, provided in this chapter of the *Program Reference Manual*, may be used to record this information as well as daily snack counts described below. If preferred, documentation of attendance and daily snack counts may be kept on two separate forms, either or both of which may be developed by the SFA.
4. Daily snack counts taken at the point of service. Area eligible sites may record the total number of snacks served. Individual eligible sites must record the number of snacks served in each eligibility category (i.e. free, reduced-price and paid). Form 25-C, Daily Afterschool Snack Count Form, provided in this chapter of the *Program Reference Manual*, may be used to record this information. If preferred, the SFA may develop and use their own form.
5. Menus and production records must be maintained to serve as documentation of compliance with meal pattern requirements. Any changes in planned menus must be noted. SFA’s may use Form 25-D, Monthly Production Record for Afterschool Snacks provided in this chapter of the *Program Reference Manual*, the South Carolina Statewide Food Production Record (Form 20-A) provided in Chapter 20 – Food Production Records or a form developed by the SFA.

### Afterschool Snacks in Residential Child Care Institutions (RCCIs)

Any residential child care institution (RCCI) that participates in the National School Lunch or School Breakfast Programs may participate in the ASP as long as the institution operates an afterschool care program with enrichment or education activities in organized, structured and supervised environments.

RCCIs may **NOT** claim reimbursement for snacks served on weekends, holidays or vacation days unless the snack is served during an activity that takes place after an education activity that is determined to be an **integral part** of the curriculum or an actual extension of the local education system. The limitation imposed is only for snacks. RCCIs may continue to claim breakfasts and lunches served on weekends, holidays and school vacations.

The age limitation for the ASP is 18 years old or under. However, if a student turns 19 before the end of the school year that ends on June 30, the RCCI may continue to claim reimbursement for the snacks until the end of that school year. Under no circumstances can an RCCI continue to be reimbursed for snacks served to students after the school year in which they become 19. As soon as a student reaches age 21, the RCCI can no longer claim reimbursement for the student’s breakfasts or lunches either.

**Claiming the Evening Meal as a Snack in an RCCI**

Q-4 *If the afterschool care activities occur late in the afternoon and coincide with the evening meal, may the RCCI claim that meal as a snack?*

A No. The afterschool snack is intended to be an additional food benefit that, in all likelihood, would not have been otherwise available to children. Therefore, if an RCCI already has a scheduled evening meal service, as would generally be the case, it would have to serve a separate snack as an additional offering at some other time during the afternoon or evening in order to receive the reimbursement. The snack must always be served in association with the afterschool education activities in organized, structured, and supervised environments.



## On-Site Review of Afterschool Snack Program

**Directions:** School Food Authorities (SFAs) must review each Afterschool Snack Program (ASP) site two times per school year. The first review must be conducted within the first four weeks of the snack program's operation. This form may be used for both reviews. File the completed forms for audit and review purposes.

School District/SFA: \_\_\_\_\_ Program Name: \_\_\_\_\_

ASP Contact Person: \_\_\_\_\_ Reviewer: \_\_\_\_\_

ASP Operates:  Mon  Tue  Wed  Thu  Fri Time Snack is Served: \_\_\_\_\_

Site is:  Area Eligible (all snacks claimed as free) **OR**  Individual Eligible (claimed according to child's eligibility status)  
 Non-pricing (no students charged for snacks) **OR**  Pricing (reduced-price and paid students charged for snacks)

Program Requirements:	1 <sup>st</sup> Review Date			2 <sup>nd</sup> Review Date		
	Yes	No	NA	Yes	No	NA
<b>1. Monitoring:</b> a. Have all corrections requested during last site monitoring been implemented?						
<b>2. Accountability:</b> a. Are daily attendance rosters maintained? b. Are snack counts taken at the point of service? c. Do all students take all required food components? d. If no, are the snacks which do not meet requirements recorded as non-reimbursable snacks? e. Are students claimed in the correct eligibility category? (If Area Eligible, all students are free.) f. If site is an Individual Eligible program, does the meal count system prevent overt identification of students' eligibility status? g. Were daily income records maintained for cash collected, if applicable? h. Were claims for reimbursement correctly filed (i.e. only one snack per child per day in the correct eligibility category)? i. Are all snacks claimed served only to enrolled students?						
<b>3. Menus and Production Records:</b> a. Does the menu on the day of monitoring meet requirements? Specify below: <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span>1<sup>st</sup> REVIEW</span> <span>2<sup>nd</sup> REVIEW</span> </div> <div style="display: flex; justify-content: space-around; margin-top: 5px;"> <span>Menu</span> <span>Portion Size</span> <span>Menu</span> <span>Portion Size</span> </div> b. Are production records and menus maintained for each day? c. Do production records reflect that menus meet component and serving size requirements?						
<b>4. Safety and Sanitation:</b> a. Are facilities/equipment adequate to allow good sanitation practices? b. Do personnel use good hygiene and sanitation practices?						
<b>5. Educational Component:</b> a. Is there an education component during afterschool care? Describe.						
<b>1<sup>st</sup> Review</b> Corrections Needed: <input type="checkbox"/> Yes <input type="checkbox"/> No Comments:   _____ Signature and Title of ASP Reviewer	<b>2<sup>nd</sup> Review</b> Corrections Needed: <input type="checkbox"/> Yes <input type="checkbox"/> No Comments:   _____ Signature and Title of ASP Reviewer					

## Daily Afterschool Snack Count Form

Program Name: \_\_\_\_\_

<b>DATE:</b>	<b>Total snacks received/ prepared:</b>											
<b>TODAY'S SNACK MENU</b>	Mark each number as a snack is served. Count only one snack per child per day.											
	1	2	3	4	5	6	7	8	9	10	11	12
	13	14	15	16	17	18	19	20	21	22	23	24
	25	26	27	28	29	30	31	32	33	34	35	36
	37	38	39	40	41	42	43	44	45	46	47	48
	49	50	51	52	53	54	55	56	57	58	59	60
Snack Supervisor's Initials:	Total Snacks Served to Students:						No. Snacks Served to Adults:					

<b>DATE:</b>	<b>Total snacks received/ prepared:</b>											
<b>TODAY'S SNACK MENU</b>	Mark each number as a snack is served. Count only one snack per child per day.											
	1	2	3	4	5	6	7	8	9	10	11	12
	13	14	15	16	17	18	19	20	21	22	23	24
	25	26	27	28	29	30	31	32	33	34	35	36
	37	38	39	40	41	42	43	44	45	46	47	48
	49	50	51	52	53	54	55	56	57	58	59	60
Snack Supervisor's Initials:	Total Snacks Served to Students:						No. Snacks Served to Adults:					

<b>DATE:</b>	<b>Total snacks received/ prepared:</b>											
<b>TODAY'S SNACK MENU</b>	Mark each number as a snack is served. Count only one snack per child per day.											
	1	2	3	4	5	6	7	8	9	10	11	12
	13	14	15	16	17	18	19	20	21	22	23	24
	25	26	27	28	29	30	31	32	33	34	35	36
	37	38	39	40	41	42	43	44	45	46	47	48
	49	50	51	52	53	54	55	56	57	58	59	60
Snack Supervisor's Initials:	Total Snacks Served to Students:						No. Snacks Served to Adults:					

**Daily Afterschool Snack Count Form Continued**

<b>DATE:</b>	<b>Total snacks received/ prepared:</b>											
<b>TODAY'S SNACK MENU</b>	Mark each number as a snack is served. Count only one snack per child per day.											
	1	2	3	4	5	6	7	8	9	10	11	12
	13	14	15	16	17	18	19	20	21	22	23	24
	25	26	27	28	29	30	31	32	33	34	35	36
	37	38	39	40	41	42	43	44	45	46	47	48
	49	50	51	52	53	54	55	56	57	58	59	60
Snack Supervisor's Initials:	Total Snacks Served to Students:						No. Snacks Served to Adults:					

<b>DATE:</b>	<b>Total snacks received/ prepared:</b>											
<b>TODAY'S SNACK MENU</b>	Mark each number as a snack is served. Count only one snack per child per day.											
	1	2	3	4	5	6	7	8	9	10	11	12
	13	14	15	16	17	18	19	20	21	22	23	24
	25	26	27	28	29	30	31	32	33	34	35	36
	37	38	39	40	41	42	43	44	45	46	47	48
	49	50	51	52	53	54	55	56	57	58	59	60
Snack Supervisor's Initials:	Total Snacks Served to Students:						No. Snacks Served to Adults:					



**South Carolina**  
**School Food Service Program Reference Manual**  
Contributors: Andrew Thomas, PhD, SNS & Julie Hartwell, PhD

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# Chapter 26 – Summer Nutrition Programs

## Hunger Doesn't Take a Vacation

Just as learning does not end when school lets out, neither does a child's need for good nutrition. Schools and other non-profit organizations are encouraged to participate in federally-funded child nutrition programs to provide free, nutritious meals and snacks to help children in low-income areas get the nutrition they need to learn, play, and grow, throughout the summer months when they are out of school.

### Program Administration

The Food and Nutrition Service, a division of the U.S. Department of Agriculture (USDA), administers the summer nutrition programs at the federal level. State agencies administer the programs at the state level. Locally, programs are run by approved sponsors, including School Food Authorities (SFAs), local government agencies, camps, or private nonprofit organizations. Sponsors provide meals to a group of children at a central site, such as a school or a community center. They receive payments from USDA, through their state agency, for the meals they serve.

The South Carolina Department of Education (SCDE) is the state agency responsible for administering the summer nutrition program options available to schools. There are three options available to school sponsors and they are all described in this chapter of the *Program Reference Manual*. In South Carolina, the Department of Social Services (DSS) is responsible for administering the Summer Food Service Program (SFSP) for non-school sponsors (such as churches and community centers).

### How to Provide Summer Meals

SFAs may provide summer meals using any of the following three options:

1. Continuation of the School Breakfast Program (SBP) and/or the National School Lunch Program (NSLP)
2. The Seamless Summer Option (SSO)
3. The Summer Food Service Program (SFSP)

#### 1. Continuation of the SBP and/or the NSLP

This option is only available to SFAs and it is the only way to provide reimbursable meals for closed academic summer school sites. It allows SFAs to simply continue the operation of the SBP and NSLP which includes the Afterschool Snack Program (ASP) into the summer months or other vacation periods. All of the requirements regarding menu planning and patterns, Offer versus Serve options, and service times remain the same for summer meals. For additional information, refer to [Chapter 19– Food-Based Menu Planning Basics](#), [Chapter 24 – School Breakfast Program](#) and [Chapter 25 – Afterschool Snack Program](#) or call SCDE at (803) 734-8188. Meals are reimbursed according to the child's eligibility status as determined during the school year (i.e. at the free, reduced-price or paid rate). Applications must be complete and approved before any free or reduced-price meal benefits are claimed for students. See the

## Chapter 26 – Summer Nutrition Programs

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“Free and Reduced-Price School Meals Family Application” form provided in Chapter 3 – Policy Agreement of this *Program Reference Manual* for additional information.) The requirements for records and the procedures for filing monthly claims for meals served during summer school are the same as during the regular school year. SCDE is the state agency responsible for ensuring that SFAs implement all program requirements correctly.

### 2. The SSO

This option is also only available to SFAs. It also allows SFAs to continue the operation of the SBP and/or the NSLP which includes the ASP into vacation months. All menu planning requirements remain the same. For additional information on menu planning guidelines, refer to Chapter 19 – Food-Based Menu Planning Basics, Chapter 24 – School Breakfast Program and Chapter 25 – Afterschool Snack Program or call SCDE at (803) 734-8188. One important difference between the SSO and a continuation of the SBP/NSLP as described above is that once approved for participation in this program, all complete meals served to eligible children are reimbursed at the SBP and NSLP **free** rates. Additional information on eligible sites and requirements regarding meal service, monitoring and record keeping is provided in this chapter of the *Program Reference Manual*. Note that closed academic summer schools are **not** eligible for participation in the SSO. SCDE is the state agency responsible for ensuring that SFAs implement all SSO program requirements correctly.

### 3. The SFSP

Both public and private non-profit organizations including schools, camps, universities operating the National Youth Sports Program and government organizations are eligible to apply to be a SFSP sponsor. Under this program, complete meals served to eligible children are reimbursed at the current SFSP rate for the applicable meal type. There are several regulations for participating sponsors and sites, many of which are similar to or the same as those for the SSO. An overview of these requirements is provided in this chapter of the *Program Reference Manual*. Detailed instructions for program administration may be obtained from USDA’s *Summer Food Service Program; 2013 Administrative Guidance for Sponsors*. This resource can be downloaded from [www.fns.usda.gov/cnd/summer/library/handbooks.html](http://www.fns.usda.gov/cnd/summer/library/handbooks.html). As explained in the section entitled, “Program Administration” SCDE is responsible for administering the SSO for school sponsors, while DSS is responsible for administering the SFSP in other non-profit organizations in South Carolina.

For additional information and a summary of the three options described above, refer to Table 26.1 - Comparison of Summer Nutrition Programs Available provided on the next page.

## Chapter 26 – Summer Nutrition Programs

**Table 26.1 - Comparison of Summer Nutrition Programs Available**

Topic	Continuation of School Breakfast Program (SBP) and National School Lunch Program (NSLP)	Seamless Summer Option (SSO)	Summer Food Service Program (SFSP)
<b>Eligible Sponsors</b>	School Food Authorities (SFAs)	Same as SBP/NSLP	SFAs Local government agencies Private non-profit organizations Universities or Colleges Community and faith-based organizations
<b>Months of Operation</b>	When school is in season as established by the school district, including academic summer school.	Same as SFSP	May to September for sites operating on traditional school calendar areas  October to April during unanticipated school closures (i.e. emergencies)  During student vacations for schools on a continuous year calendar (During extended breaks for schools operating on a year-round calendar)
<b>Meal Service Locations</b>	Schools Residential Child Care Institutions (RCCIs)	Same as SFSP	Schools Camps Churches Community Centers Housing Projects Other public sites where children gather  Libraries Migrant Centers Parks Playgrounds Pools
<b>Establishing Site Eligibility</b>	<u>Schools:</u> Public and private non-profit schools of high school grade and under that are part of the state's education system  <u>RCCIs:</u> Public and licensed, non-profit, private organizations/sites	Same as SFSP	<u>Open Sites:</u> 50 percent or more of the children in an area qualify for free or reduced price school meals, based on school or census data, and open to the community.  <u>Enrolled Sites:</u> 50 percent or more of enrolled children are eligible for free or reduced price meals, determined by approved applications, or sites operating in an eligible area.  <u>Migrant Sites:</u> Certification by a migrant organization that the sites serve children of migrant farm workers.  <u>Camps:</u> Offer a regularly scheduled food service as part of an organized program for enrolled children.

## Chapter 26 – Summer Nutrition Programs

Table 26.1 continued

Topic	SBP/NSLP	SSO	SFSP
<b>Eligible Participants</b>	Students enrolled in a school of high school grade and under as determined by SCDE, including persons enrolled in a school program for the mentally or physically disabled; and persons under 21 enrolled in an RCCL.	Same as SFSP	Persons ≤ 18 years and persons ≥ 19 with a physical or mental disability, as defined by SCDE (or DSS if applicable).
<b>Meal Pattern</b>	Must use one of the five (5) approved menu planning approaches. (See Chapter 19 – Menu Planning in <i>Program Reference Manual</i> .)	Same as SBP/NSLP	Must use SFSP Meal Pattern as described in this chapter of the <i>Program Reference Manual</i> . However, SFAs may substitute SBP/NSLP meal patterns if approved by SCDE.
<b>Type of Meals</b>	Breakfast Lunch Afterschool Snacks	Same as SFSP	Breakfast Lunch Snack (AM or PM) Supper Lunch & supper cannot be reimbursed for the same day by the same site, except for camp and migrant sites.
<b>Maximum Number of Meals</b>	3 meals (breakfast, lunch and afterschool snack)	Same as SFSP	2 meals (including snacks) for most sites  3 meals (including snacks) for migrant sites and camps
<b>Meal Time Restrictions</b>	Breakfast must begin before 10 AM. Lunch must be served between 10 AM and 2 PM. Snacks must be served after close of school.	Breakfast must begin before 10 AM. Lunch must be served between 10 AM and 2 PM. Supper must begin before 7 PM and end by 8 PM. Snacks must be evenly and adequately spaced between other meal times.	Breakfast must begin before 10 AM, lunch must be served between 10 AM and 2 PM. Three (3) hours must elapse from the start of the first meal to the start of the second meal.
<b>POS Accountability</b>	Roster/meal count by category (i.e. free, reduced-price, paid)	Same as SFSP	Written tally
<b>Meal Cost for Children</b>	Meal cost (free, reduced-price and paid) for children is based on their income eligibility	Same as SFSP	All meals are free  (Although camps are only reimbursed for children who qualify for free or reduced price meals, camp sponsors may, and usually do, provide meals free of charge to all children.)
<b>Commodities</b>	23.25 cents per meal (2013-2014 school year) May also receive bonus commodities, as available, in accordance with statute.	Same as SBP/NSLP	1.5 cents per meal for sponsors and self-prep sites May also receive bonus commodities, as available, in accordance with statute.

## Chapter 26 – Summer Nutrition Programs

Table 26.1 continued

Topic	SBP/NSLP	SSO	SFSP																												
<b>Reimbursement Rates</b>	<p>Less than 60% &amp; severe need</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Type of Meal</th> <th style="text-align: center;">Breakfast</th> <th style="text-align: center;">Lunch</th> <th style="text-align: center;">Snack</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Paid</td> <td style="text-align: center;">0.27</td> <td style="text-align: center;">0.27</td> <td style="text-align: center;">0.07</td> </tr> <tr> <td style="text-align: center;">R/P</td> <td style="text-align: center;">1.55</td> <td style="text-align: center;">2.46</td> <td style="text-align: center;">0.39</td> </tr> <tr> <td style="text-align: center;">Free</td> <td style="text-align: center;">1.85</td> <td style="text-align: center;">2.86</td> <td style="text-align: center;">0.78</td> </tr> </tbody> </table> <p>School Year 2012-2013</p>	Type of Meal	Breakfast	Lunch	Snack	Paid	0.27	0.27	0.07	R/P	1.55	2.46	0.39	Free	1.85	2.86	0.78	<p>All eligible meals provided under SSO paid at SBP/NSLP applicable rates</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: center;">Type of Meal</th> <th style="text-align: center;">Breakfast</th> <th style="text-align: center;">Lunch or Supper</th> <th style="text-align: center;">Snack</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Self-Prep or Rural</td> <td style="text-align: center;">1.98</td> <td style="text-align: center;">3.47</td> <td style="text-align: center;">0.82</td> </tr> <tr> <td style="text-align: center;">Other Types of Sites</td> <td style="text-align: center;">1.9425</td> <td style="text-align: center;">3.4125</td> <td style="text-align: center;">0.80</td> </tr> </tbody> </table> <p>Calendar Year 2013</p>	Type of Meal	Breakfast	Lunch or Supper	Snack	Self-Prep or Rural	1.98	3.47	0.82	Other Types of Sites	1.9425	3.4125	0.80
Type of Meal	Breakfast	Lunch	Snack																												
Paid	0.27	0.27	0.07																												
R/P	1.55	2.46	0.39																												
Free	1.85	2.86	0.78																												
Type of Meal	Breakfast	Lunch or Supper	Snack																												
Self-Prep or Rural	1.98	3.47	0.82																												
Other Types of Sites	1.9425	3.4125	0.80																												
<b>Reimbursement Method</b>	<p>Total meals by type times the free, reduced-price, or paid rate for each type of meal.</p> <p>Extra \$.02 per lunch if 60 percent or more of lunches in second preceding year were free or reduced price.</p> <p>Additional payments for free or reduced price breakfasts in severe need schools.</p>	<p>If area eligible, all meals reimbursed at SBP/NSLP free rates.</p> <p>If applications required (camps or closed enrolled in non-eligible area), free and reduced price meals reimbursed at free SBP/NSLP rate. No reimbursement for paid meals.</p> <p>No separate administrative reimbursement provided.</p>	<p>SFSP sponsors receive the maximum amount of operating and administrative reimbursements (meals times rates) without regard to their actual or budgeted costs.</p> <p>Sponsors may use reimbursements to pay for any allowable program cost.</p> <p>Camps are reimbursed only for meals served to eligible children.</p>																												
<b>Monitoring Required of SFA/Sponsors</b>	<p>Onsite review of lunch counting and claiming system for each school by February 1<sup>st</sup> each year.</p>	<p>Review of meal counting, claiming and meal pattern compliance at least once during each site's operation.</p>	<p>Pre-operational visits before a new or problem site operates the summer program.</p> <p>Site visits the first week of operation (may be waived by SCDE for experienced school sponsors).</p> <p>Site review during first 4 weeks of operation, followed by additional monitoring as needed.</p>																												
<b>Monitoring Required of State</b>	<p>Administrative Review (AR) every 3 years.</p> <p>School Meals Initiative (SMI) review every 5 years to determine how well the SFA is meeting the nutrition standards.</p>	<p>AR every 3 years. If SFA is participating in SSO, one SSO site must be included in the Administrative review.</p>	<p>Review every 3 years; more frequently based on program size and prior problems identified by SCDE (or DSS if applicable).</p>																												
<b>Public Notification</b>	<p>SFA must send public media notice regarding program and letter or notice with an application to parents for all children in attendance at the school at the beginning of each school year.</p>	<p>Public media notice may be done but is not required.</p> <p>SFA must state in application how each site (excluding closed enrolled sites) will advertise availability of meals to neighborhood community.</p>	<p>Sponsor must send public media notice regarding program and eligibility.</p>																												

### Eligible Sponsors

Both public and private non-profit schools are eligible to participate in the above programs under the administration of SCDE. Public or private non-profit residential child care centers (RCCIs) may provide summer meals by continuing the SBP and NSLP during the summer months.

In order to be approved for participation in the SFSP or SSO, sponsors must:

- Demonstrate financial and administrative capability;
- Not have been declared seriously deficient;
- Serve low-income children (camps are exempt from this requirement);
- Provide some type of year-round service to the community (unless exemption granted by SCDE);
- Assure they will exercise management control over their site(s);
- Conduct pre-operational visit(s) (SFSP sites only/SSO when applicable);
- Sign a written agreement with SCDE.

### Selection of SSO

Sponsors may operate the SSO or SFSP at one or more sites, which are the actual locations where meals are served and children eat in a supervised setting. When selecting sites, two types of factors must be considered: the site's eligibility and the ability of the site to meet requirements.

#### Site Eligibility

Eligible sites are those that serve children in low-income areas or specific groups of low-income children. Sponsors must provide documentation that proposed sites meet the income eligibility criteria required by law. There are three common types of sites: open sites, camps (residential and nonresidential), and closed enrolled sites. Restricted open and migrant sites are two additional types of open sites.

#### Open Sites

Open sites must be located in a needy area: one in which 50 percent or more of the children are eligible for free or reduced-price meals. The meals are available to all children in the surrounding area at no charge on a first-come, first-served basis. Under the SSO, all complete meals served to eligible children are reimbursed at the free rate regardless of each child's eligibility status. Under the SFSP, complete meals served to eligible children are reimbursed according to meal type at the current SFSP reimbursement rate. A maximum of **two** (2) meals (including snacks) per child per day may be claimed for reimbursement. Lunch and supper may **not** be claimed on the same day for the same child. The site's eligibility or status as an open site or restricted open site (see below) must be documented every five years if free and reduced-price application information from area schools is used. If U.S. census data was used to establish eligibility in the prior year, eligibility must be updated when significant changes occur and/or new information is available.

**“Open” Summer School Sites**

Q-1 *Can a Seamless Summer Option (SSO) sponsor invite children in the community to participate in a meal service at a site where an academic summer school program is in session?*

A Yes. If the meal service is open to all children residing in the needy area served by the site, the academic summer school is considered an open site and is eligible for participation in the SSO.

**Restricted Open Sites**

These are the same as open sites except that following initial broad community participation, attendance is restricted or limited for reasons of space, security, control or safety. When an open site is restricted, the sponsor must:

- Use recent data to document that the area in which the site is located (or draws participation) is actually eligible;
- Make it publicly known in its media release that the site is open on a first-come, first-served basis to all children of the community at large; and
- Give the reason(s) that the site’s enrollment will be limited (i.e. space, security, control or safety).

See the previous section entitled, “Open Sites” for additional information.

**Migrant Sites**

A migrant site is a type of open or restricted open site. Sponsors must certify that the site only serves or primarily serves children of migrant workers. Determination of site eligibility is required on an annual basis through a migrant coordinator. Under the SSO, meals are provided at no charge and complete meals served to eligible children are reimbursed at the free rate. Under the SFSP, meals are provided at no charge but are reimbursed at the current SFSP rates for the meal type(s) being served. A maximum of **three** meals (including snacks) per child per day may be claimed for reimbursement. Lunch and supper **may** be claimed for the same child on the same day.

**Residential/Nonresidential Camp Sites**

Camps that offer regularly scheduled food service as part of an organized program for enrolled children may receive reimbursement for meals served to children eligible for free or reduced-price school meals. Under the SSO, all meals served to these children are reimbursed at the free rate. Under the SFSP, these meals are reimbursed at the current SFSP rates for the applicable meal type. No reimbursement is received under either program for children eligible for meals at the paid rate. A maximum of **three** meals (including snacks) per child per day may be claimed for reimbursement. Lunch and supper **may** be claimed for the same child on the same day. The eligibility of each child must be determined annually using information from area schools or the “Free and Reduced-Price School Meals Family Application” provided in Chapter 3– Policy Agreement of this *Program Reference Manual*.

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### Closed Enrolled Sites

A closed enrolled site serves only specific groups of enrolled children on a daily basis and the food service site is not open for area children to drop-in. Examples of closed enrolled sites include recreation programs and enrichment classes or programs. The SFA could sponsor and operate these sites or sponsor sites that are operated by local government, school or private non-profit organizations. Closed enrolled sites are usually established where:

- An identified group of needy children live in a “pocket of poverty;” not reflective of the community’s economic status;
- Identified needy children are transported to a congregate meal site located in an area with less than 50 percent eligible children;
- A program providing recreational, cultural, religious, or other types of organized activities operates for a specific group of children with the exception of an accredited summer school.

To qualify as a closed enrolled site, at least 50 percent of the enrolled children must have been individually determined to be eligible for free or reduced-price school meals. All children in attendance then receive a free meal. Under the SSO, all complete meals served to eligible children are reimbursed at the free rate. Under the SFSP, these meals are reimbursed at the current SFSP rates. A maximum of **two** meals (including snacks) per child per day may be claimed for reimbursement. Lunch and supper may **not** be claimed on the same day for the same child.

Eligibility must be determined annually and may be determined using school application data or U.S. census data. Non-school sponsors may request free and reduced-price meal application and direct certification information collected by SFAs during the school year. However, it is important to note that SFAs are not required by law to share this information.

### Site Evaluation

Each SFA is responsible for all sponsored sites and should only approve sites that demonstrate that they have the financial and administrative capabilities to operate a summer feeding program. Where possible, SFAs are encouraged to expand their summer feeding programs by sponsoring non-school sites that are operated by non-profit organizations. It is essential, however, to ensure that all sites under a SFA’s sponsorship, both schools and non-schools, meet all requirements. All sites must be public spaces, easily accessible by children, and in safe/secure surroundings.

If possible, sponsors should select sites that offer organized activities during the day (for example, year-round public-service programs in the community). These sites will usually have facilities that can be used for the meal service and have permanent staff.

Select sites with adequate space and equipment for both the service and preparation of meals (if applicable) for the anticipated number of children. To determine the expected number of children, consider the site’s capacity and the number of children living in the area who are likely to attend. Contact schools and other children’s organizations in the area and then determine the number of needy children within a short walking distance of each site. An accurate estimate is essential for proper planning. It impacts everything from administrative and facility needs to the total potential reimbursement the sponsor will receive.

Ensure that all sites meet state and local public health standards. The sanitation or health inspector from the local health department can assist in establishing compliance with state and local rules and regulations. For additional information, contact the South Carolina Department of Health and Environmental Control (DHEC) at (803) 896-0640.

## Chapter 26 – Summer Nutrition Programs

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When considering how many sites to sponsor, keep in mind that the SFA is responsible for providing adequate supervision at all sites in order to enforce program requirements and ensure student safety.

### Eligible Participants

#### Participation in SBP and NSLP

Any student enrolled in a school of high school grade or under, including persons enrolled in a school program for mentally or physically disabled, and persons under 21 enrolled in an RCCI, are eligible to receive reimbursable meals.

#### Participation in SSO and SFSP

Children eligible to participate in all three summer feeding programs are those who are 18 years of age and under. Those over age 18, who are determined by the applicable state agency to be mentally or physically disabled and who participate during the school year in a public or private non-profit program for mentally or physically disabled persons, are also eligible.

If meals are served to additional persons, they may not be claimed for reimbursement.

### Menu Planning

The goal of all Child Nutrition Programs, including the SBP, NSLP, SSO and the SFSP, is to serve nutritious meals that are appetizing to children. Careful menu planning is necessary to meet this goal. Meal pattern requirements assure well-balanced meals that supply the kinds and amounts of foods that children require to help meet their nutrient and energy needs.

#### Planning Summer Meals under the SBP, NSLP and SSO

SFAs providing meals under the SBP, NSLP or SSO should plan lunches (and suppers under the SSO) following the food based menu planning system, breakfasts following the guidance provided in [Chapter 24 – School Breakfast Program](#), and morning and afternoon snacks following the meal pattern described in [Chapter 25 – Afterschool Snack Program](#). The Offer versus Serve option, which allows children to refuse one or more menu items while still consuming a reimbursable meal, may be used at breakfast, lunch and/or supper but does not apply to snacks.

#### Planning Summer Meals under the SFSP

Breakfasts provided under the SFSP must consist of:

- One serving of fluid milk;
- One serving of a vegetable or fruit or full-strength juice; and
- One serving of grain or bread.

A meat or meat alternate is optional.

## Chapter 26 – Summer Nutrition Programs

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Lunches and suppers provided under the SFSP must consist of:

- One serving of fluid milk;
- Two or more servings of vegetables and/or fruits;
- One serving of grain/bread; and
- One serving of meat/meat alternate.

Snacks provided under the SFSP must:

- Contain at least two food items from different food components. (Food components are milk, vegetable/fruit, grain/bread, and meat/meat alternate.)
- Not consist only of milk and full-strength juice. (That is, two beverages alone do not make a reimbursable snack.)

Refer to Table 26.2 – Summer Food Service Program Meal Pattern for detailed information on the meal pattern and portion sizes required for each meal and snack. SFSP sponsors serving meals that are prepared in schools may, with prior approval from SCDE, use the SBP, NSLP and ASP meal pattern requirements which they are accustomed to using instead of the SFSP meal patterns described in this chapter.

## Chapter 26 – Summer Nutrition Programs

**Table 26.2 – Summer Food Service Program Meal Pattern**

Food Component / Item	Breakfast	Lunch or Supper	Snack <sup>1</sup> (Choose 2 of the 4)
<b>Milk</b> Milk, fluid	8 fl. oz. or 1 cup <sup>2</sup>	8 fl. oz. or 1 cup <sup>3</sup>	8 fl. oz. or 1 cup <sup>2</sup>
<b>Vegetables and/or Fruits</b> Vegetable(s) and/or fruit(s)	½ cup	¾ cup <sup>4</sup> (K-8) 1 cup (9-12)	¾ cup
Full-strength vegetable or fruit juice	½ cup or 4 fl. oz.		¾ cup or 6 fl. oz
An equivalent quantity of any combination of vegetable(s), fruit(s), and juice			
<b>Breads and Grains<sup>5</sup></b> Bread	≥1 oz. eq.	≥1 oz. eq. (K-8) ≥2 oz. eq. (9-12)	≥1 oz. eq.
Cornbread, biscuits, rolls, muffins, etc.	1 serving	1 serving	1 serving
Cold, dry cereal	¾ cup or 1 oz <sup>6</sup>		¾ cup or 1 oz <sup>6</sup>
Cooked pasta or noodle product	½ cup	½ cup	½ cup
Cooked cereal or cereal grains or an equivalent quantity of any combination of grains/breads	½ cup	½ cup	½ cup
<b>Meat and Meat Alternates</b> Lean meat or poultry or fish or alternate protein product <sup>7</sup>	1 oz.	1 oz. (K-8) 2 oz. (9-12)	1 oz.
Cheese	1 oz.	2 oz.	1 oz.
Eggs	½ large egg	1 large egg	½ large egg
Cooked dry beans or peas	¼ cup	½ cup	¼ cup
Peanut butter or soy nut butter or other nut or seed butters	2 Tbsp.	4 Tbsp.	2 Tbsp.
Peanuts or soy nuts or tree nuts or seeds	1 oz.	1 oz. = 50% <sup>8</sup>	1 oz.
Yogurt, plain or sweetened and flavored	4 oz. or ½ cup	8 oz. or 1 cup	4 oz. or ½ cup
An equivalent quantity of any combination of the above meat/meat alternates			

1 Serve two food items. Each food item must be from a different food component. Juice may not be served when milk is served as the only other component.

2 Must be served as a beverage, or on cereal, or use part of it for each purpose.

3 Must be served as a beverage.

4 Serve two or more kinds of vegetable(s) and/or fruit(s) or a combination of both. Full-strength vegetable or fruit juice may be counted to meet not more than one-half of this requirement.

5 All grain/bread items must be enriched or whole grain, made from enriched or whole grain meal or flour, or if it is a cereal, the product must be whole grain, enriched or fortified. Bran and germ are credited the same as enriched or whole grain meal or flour. Beginning 2013-14, all grains must be whole-grain rich.

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

7 Must meet the requirements in Appendix A of the SFSP regulations.

## Chapter 26 – Summer Nutrition Programs

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- 8 No more than 50 percent of the requirements shall be met with nuts or seeds. Nuts or seeds shall be combined with another meat/meat alternate to fulfill the requirement. When determining combinations, 1 oz. of nuts or seeds is equal to 1 oz. of cooked lean meat, poultry or fish.

### Meal Preparation

Meals can be prepared onsite or may be transported from another site. All meals must be prepared following safety and sanitation guidelines required by DHEC. For additional information, contact DHEC at (803) 896-0640.

### Meal Service

For information on meal service requirements for meals provided under the SBP and NSLP, see Chapter 6 – Meal Service Policies provided in this *Program Reference Manual*. When providing meals under the SSO and SFSP, sponsors must do the following:

- Offer an identical meal to each child.
  - Under the SSO, use the following guidelines for serving times:
    - Breakfast must be served in the morning hours before 10:00 AM;
    - Lunch must be served between 10:00 AM and 2:00 PM;
    - Supper meals must begin before 7:00 PM and end by 8:00 PM; and
    - Snacks must be evenly and adequately spaced between other meal service times.
  - Under the SFSP, use the following guidelines for serving times:
    - Three hours must elapse between the **beginning** of one approved meal service (including snacks) and the **beginning** of another;
    - Four hours must elapse between lunch and supper when a migrant or day camp site serves lunch and supper, with no afternoon snack between the two meals;
    - Supper must begin before 7:00 PM (unless SCDE grants a waiver) and, in all cases, end by 8:00 PM;
    - The serving periods for lunch and supper may not exceed two hours; and
    - The serving periods for breakfast and snacks may not exceed one hour.
- Note:** These time restrictions do not apply to residential camps.
- Provide meals during the advertised serving times approved by SCDE. SCDE must approve any changes in meal service times.
  - Ensure that children eat all parts of the meal onsite. Provide adequate supervision to ensure that food is not taken away from the site for later consumption. Only meals consumed onsite are eligible for reimbursement.
  - Ensure that all children in attendance at the site receive one meal before any child is served a complete second meal, or any adult meals are served.
  - Make adequate arrangements for food service during inclement weather if meals are usually served at an outdoor site.
  - Count the number of reimbursable meals served at the point of service (i.e. as they are served).
  - Serve meals free of charge under the SSO and SFSP with the exception of camps which may charge for meals served to children who are not eligible to receive free or reduced-price meals.

### Reimbursement

Reimbursement is based on the number of meals served. All complete meals served to eligible children under the SBP and NSLP are reimbursed at the free, reduced-price or paid rate for the applicable meal program (SBP, NSLP, or ASP) according to each child's eligibility status. When operating the SSO, all complete meals served to eligible children are reimbursed at the free rate for the applicable meal type (breakfast, lunch or snack). When operating the SFSP, all complete meals served to eligible children are reimbursed at the SFSP rate for the appropriate meal type. All reimbursement rates are established annually by USDA and are then distributed to SFAs by SCDE. The SBP, NSLP and ASP rates (and therefore the SSO rates) are effective from July 1 to June 30 each year. The SFSP rates are effective from January 1 to December 31 each year. All rates are available from [www.fns.usda.gov/cnd/lunch](http://www.fns.usda.gov/cnd/lunch) or by contacting SCDE at (803) 734-8188.

#### Use of SFSP Reimbursement Money

**Q-2** *Do we still have to report operational and administrative costs in order to receive reimbursement for the Summer Food Service Program (SFSP)?*

**A** No. Beginning January, 2008 all complete SFSP meals served to eligible children are reimbursed at the maximum rate regardless of actual operational and administrative costs. Sponsors do not need to report actual costs to SCDE. However, sponsors must keep records of such costs on file for SCDE and USDA reviewers to audit, as needed.

### Monitoring

#### Requirements for SFAs Continuing the SBP and/or NSLP

SFAs continuing the operation of the SBP and/or the NSLP are required to conduct an onsite review of the lunch counting and claiming system for each school by February 1 of each year.

#### Requirements for SSO Sponsors

Each year, SFAs are required to review all of their SSO sites at least once during the site's operation. The SFA must review the site's compliance with meal counting, claiming, menu planning, and food safety requirements. Compliance with these requirements must be observed and documented in writing. Use of the Seamless Summer Option Review Form (Form 26-A) provided in this chapter of the *Program Reference Manual* is recommended.

#### Requirements for SFSP Sponsors

SFSP Sponsors are required to conduct a:

- **Pre-operational visit.** Visiting all new and problem sites before they begin operations is required to make sure that the sites have facilities to provide meal services for the number of children expected to attend. Use of the Summer Food Service Program Pre-operational Visit Form (Form 26-B) provided in this chapter of the *Program Reference Manual* is recommended.

## Chapter 26 – Summer Nutrition Programs

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- **Site visit** at all sites during the first week of operation. The purpose of site visits is to ensure that the food service is operating smoothly and that any apparent problems are immediately resolved. (Note: A site “visit” does not require the monitor to observe a complete meal service from beginning to end.) Use of the Summer Food Service Program First Week Visit Form (Form 26-C) provided in this chapter of the *Program Reference Manual* is recommended.
- **Site review** at all sites at least once during the first four weeks of operation (or before they shut down if site operates less than four weeks). A site “review” requires the monitor to determine if the site is meeting all the various program requirements. To accomplish this, a monitor will have to observe a complete meal service from beginning to end. This includes delivery or preparation of meals, the meal service, and clean up after meals. Use of the Summer Food Service Program Site Review Form (Form 26-D) provided in this chapter of the *Program Reference Manual* is recommended.

### Follow-up by Sponsors

If SFA monitors find any problems while conducting visits or reviews, corrective actions must be documented and prompt action must be taken by the site to correct the problems. SFAs should follow up on previous reviews and inspections by the health department as well as their own reviews to ensure that all problems have been corrected. SFAs must continue to monitor sites throughout the summer at a level sufficient to ensure that all sites continue to comply with program regulations.

### Reviews Conducted by SCDE

SCDE staff will also review summer feeding programs and sites. SFAs operating the NSLP receive an Administrative Review (AR) every three years. SCDE is required to review at least one SSO site in operation at all SFAs scheduled for an Administrative Review during either the previous or current school year. See Chapter 16 – Administrative Review for additional information on these reviews. In addition to the areas monitored by individual sponsors, SCDE staff will evaluate civil rights compliance, program promotion activities, and general administration of the program. USDA staff may also visit summer feeding sites sometime during their operating schedule.

## Record Keeping

### Requirements for Sponsors Continuing the SBP and NSLP

Each chapter in this *Program Reference Manual* explains record keeping requirements for SFAs operating the SBP and NSLP and provides forms which can or must be used. Refer to each chapter as needed.

### Requirements for SSO Sponsors

In addition to documentation of site reviews, SSO sponsors must use and maintain a record of daily meal counts to document the number of program meals served to eligible children. The sponsoring SFA must provide the necessary record sheets for each site. The Daily Meal Count Form for the Seamless Summer Option Program (Form 26-E) provided at the end of this chapter of the *Program Reference Manual* may be used. Site personnel are responsible for completing the records based on actual counts taken at each site for each meal service on each day of operation. Site personnel must be sure that they record all required counts.

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These counts must include the following information:

- The number of meals delivered (receiving site) or prepared (preparation site), by type (breakfast, snack, lunch, supper)

Vended programs must support this information with a signed delivery receipt. Good program management practices require that programs with a central kitchen should also support this information with a signed copy of the delivery receipt. A designated member of the site staff must verify the adequacy and number of meals delivered by checking the meals when they are delivered to the site.

- The number of complete reimbursable meals (count a maximum of two or three meals per child per day depending on type of site and do not count seconds served in this number);
- The number of non-reimbursable meals (i.e. incomplete meals, seconds);
- The number of meals served to program adults, if any;
- The number of meals served to non-program adults, if any;
- The number of excess meals or meals leftover.

SFAs must keep all records related to the SSO program on file for three years plus the current school year. Meal count records are the supportive documentation for reimbursement claims. All review forms and meal count records are subject to review and audit.

### **Requirements for SFSP Sponsors**

In addition to documentation of site visits and reviews, SFSP sponsors must maintain records of:

- Meal counts taken daily at each site;
- Program operating costs, including food and other costs;
- Program administrative costs, including labor and supplies; and
- Funds accruing to the program.

For instructions on how to keep these records and for sample forms, refer to USDA's *Summer Food Service Program; 2013 Administrative Guidance for Sponsors*. This resource can be downloaded from [www.fns.usda.gov/cnd/summer/library/handbooks.html](http://www.fns.usda.gov/cnd/summer/library/handbooks.html).

## Seamless Summer Option Review Form

Sponsor/SFA: \_\_\_\_\_ Site Name: \_\_\_\_\_

Site Contact Name: \_\_\_\_\_ Telephone: \_\_\_\_\_

Site Address: \_\_\_\_\_

Reviewer: \_\_\_\_\_ Date of Review: \_\_\_\_\_

Meals Served:  Mon  Tue  Wed  Thu  Fri  Sat  Sun

Type of site:  Open  Restricted Open  Migrant  Closed Enrolled  Camp

Info. from Application Time of Service: \_\_\_\_\_ Estimated Participation: \_\_\_\_\_

Program Requirements	Answers marked with an asterisk (*) must be explained.	Comments/Explanation
<b>1. Site Eligibility</b> a. Is site eligibility determined and documented correctly? b. Enrolled and Camp Sites: Are the applications approved correctly?	a. <input type="checkbox"/> Yes <input type="checkbox"/> No* b. <input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> NA	
<b>2. Monitoring</b> a. Have all corrections requested during last review been made? b. Meal observed c. Was the meal offered at the advertised and approved time? d. How many children were observed participating?	a. <input type="checkbox"/> Yes <input type="checkbox"/> No* Brk AM Snk Lnc PM Snk Sup <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> c. <input type="checkbox"/> Yes <input type="checkbox"/> No* d. _____	
<b>3. Counting and Claiming</b> a. Are meal counts taken at the point of service? b. Does Daily Meal Count form accurately record all meals served? c. Are only reimbursable meals claimed? d. Camps only: Does the meal count system prevent overt identification of children's eligibility status (paid vs. free or reduced-price)?	a. <input type="checkbox"/> Yes <input type="checkbox"/> No* b. <input type="checkbox"/> Yes <input type="checkbox"/> No* c. <input type="checkbox"/> Yes <input type="checkbox"/> No* d. <input type="checkbox"/> Yes <input type="checkbox"/> No* <input type="checkbox"/> NA	
<b>4. Menus and Production Records</b> a. Which menu planning system is used? b. Is "Offer vs. Serve" used? If yes, how many items are required for a reimbursable meal? c. Does the meal offered on the day of review contain the required menu items/components for the applicable menu planning system? d. Are production records and menus maintained for each day? e. Do production records reflect that menus meet requirements?	a. <input type="checkbox"/> NSMP <input type="checkbox"/> Trad. FB <input type="checkbox"/> Other <input type="checkbox"/> Enh. FB <input type="checkbox"/> Yes <input type="checkbox"/> No Lunch/Supper: _____ Breakfast: _____ c. <input type="checkbox"/> Yes <input type="checkbox"/> No* d. <input type="checkbox"/> Yes <input type="checkbox"/> No* e. <input type="checkbox"/> Yes <input type="checkbox"/> No*	
<b>5. Safety and Sanitation</b> a. Are facilities/equipment adequate to allow good sanitation practices? b. Do personnel use good hygiene and sanitation practices?	a. <input type="checkbox"/> Yes <input type="checkbox"/> No* b. <input type="checkbox"/> Yes <input type="checkbox"/> No*	

**6. Civil Rights**

- a. Is the USDA-approved poster displayed in a prominent place and visible to recipients?  Yes  No\*
- b. Is access to the program at the site non-discriminatory with regard to age, gender, disability, race, color, or national origin, religion and political beliefs?  Yes  No\*
- c. Is the correct non-discrimination statement included on appropriate program materials?  Yes  No\*
- d. Are foreign language translations available when a significant number of persons speaking only a foreign language are in the population?  Yes  No\*
- e. Are procedures established to receive complaints alleging discrimination? NA
- f. Have there been any written or verbal complaints alleging discrimination?  Yes  No\*  
 Yes  No\*
- g. Actual current attendance by racial/ethnic group:
 

Black or African American	Asian	American Indian or Alaska Native	Native Hawaiian or Other Pacific Islander	White	Hispanic or Latino	Total
_____	_____	_____	_____	_____	_____	_____
- h. If all program participants at the site are only one race/ethnic group, indicate the general racial composition of the site which the area serves. \_\_\_\_\_

Comments:

**7. Program Promotion**

- a. Is the site adequately advertised in the community surrounding the site?  Yes  No  
Attach copies of all marketing efforts to this review form.  
Comments:

**Additional/General Comments:**

**Areas in Need of Improvement:**

\_\_\_\_\_  
**Reviewer's Title**

\_\_\_\_\_  
**Site Supervisor's Title**

\_\_\_\_\_  
**Reviewer's Signature**

\_\_\_\_\_  
**Site Supervisor's Signature**

## Summer Food Service Program Pre-operational Visit Form

Site Name: \_\_\_\_\_ Site Number: \_\_\_\_\_

Site Address: \_\_\_\_\_

Site Contact Name: \_\_\_\_\_ Telephone: \_\_\_\_\_

Type of Site (check one):  
 Recreation Center       Park       School  
 Residential Camp       Church       Playground  
 Playground       Settlement House       Other

Estimated number of children the site could serve: \_\_\_\_\_

Estimated number of needy children in the area: \_\_\_\_\_

Estimated number of personnel needed to adequately control the food service: \_\_\_\_\_

Is another site needed in this area?       Yes       No

Are the present facilities adequate for an organized meal service?       Yes       No

If answer is no, comments: \_\_\_\_\_

---

For the estimated number of children, does the site have:

Shelter for inclement weather?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Adequate cooking facilities (if applicable)?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Adequate storage for prepared or delivered food?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Storage space for records at site?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Adequate refrigeration?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Access to a telephone?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

What type of organized activities are possible or planned at this site?

Improvements or corrective actions needed before site operates:

---

Monitor's Name \_\_\_\_\_ Monitor's Signature \_\_\_\_\_ Date \_\_\_\_\_

## Summer Food Service Program First Week Visit Form

Site Name: \_\_\_\_\_ Site Address: \_\_\_\_\_

Date of Visit: \_\_\_\_\_ Monitor's Arrival Time: \_\_\_\_\_ Departure Time: \_\_\_\_\_

Site Contact Name: \_\_\_\_\_ Telephone: \_\_\_\_\_

Areas of Discussion	Notes and Observations
1. Has the site supervisor attended training session(s)?	
2. Area meals being counted and signed for?	
3. Area all required records being completed?	
4. Area meals served as second meals excessive?	
5. Do meals meet meal pattern requirements?	
6. Is there proper sanitation/storage?	
7. Is the site supervisor following procedures established to make meal order adjustments?	
8. Are meals served within appropriate time frames?	
9. Are all meals served and consumed onsite?	
10. Is each meal served as a unit?	
11. Are there any problems with delivery?	
12. Is there documentation of children's' income eligibility, if applicable?	
13. Is there a nondiscrimination poster, provided by the sponsor, on display in a prominent place?	

List any problems that were noted during the visit and any corrective actions that were initiated to eliminate the problems:

\_\_\_\_\_  
Monitor's Name

\_\_\_\_\_  
Monitor's Signature

\_\_\_\_\_  
Site Supervisor's Name

\_\_\_\_\_  
Site Supervisor's Signature

## Summer Food Service Program Site Review Form

**Instructions:** Complete during first four weeks of operation.

Sponsor/SFA: \_\_\_\_\_ Site Name: \_\_\_\_\_

Site Address: \_\_\_\_\_

Site Contact Name: \_\_\_\_\_ Title: \_\_\_\_\_

Site Supervisor: \_\_\_\_\_ Telephone: \_\_\_\_\_

Reviewer's Name: \_\_\_\_\_ Title: \_\_\_\_\_

Date of Review: \_\_\_\_\_ Reviewer's Arrival Time: \_\_\_\_\_ Departure Time: \_\_\_\_\_

Type of site:     Open         Restricted Open     Migrant         Closed Enrolled     Camp

Average Daily Participation (if applicable) \_\_\_\_\_ Today's Attendance: \_\_\_\_\_ Approved Service Time: \_\_\_\_\_

Meals Reviewed:     B-fast         AM Snack         Lunch         PM Snack     Supper

Day of Review	Breakfast	AM Snack	Lunch	PM Snack	Supper
# Meals Delivered					
# Meals/Milk from Previous Day					
Time Meals Delivered					
Time Meals Served					
# First Meals Served to Children					
# Second Meals Served to Children					
# Meals Served to Program Adults					
# Meals Served to Non-Program Adults					
# Meals Leftover					

**Summer Food Service Program Site Review Form** continued

Explain any "NO" answers below.	YES	NO
1. Does the staffing pattern correspond to that listed on the approved site sheet?	<input type="checkbox"/>	<input type="checkbox"/>
2. Has the site supervisor attended training session?	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the site have sufficient food service supervision?	<input type="checkbox"/>	<input type="checkbox"/>
4. Are meals counted/checked before signing delivery receipt?	<input type="checkbox"/>	<input type="checkbox"/>
5. Are accurate meal counts taken of meals served?	<input type="checkbox"/>	<input type="checkbox"/>
6. Are meals served as second meals excessive?	<input type="checkbox"/>	<input type="checkbox"/>
7. Are records of adult meals being kept?	<input type="checkbox"/>	<input type="checkbox"/>
8. Do meals meet approved menu?	<input type="checkbox"/>	<input type="checkbox"/>
9. Do meals meet meal pattern requirements?	<input type="checkbox"/>	<input type="checkbox"/>
10. Are meals checked for quality?	<input type="checkbox"/>	<input type="checkbox"/>
11. Is there proper sanitation/storage?	<input type="checkbox"/>	<input type="checkbox"/>
12. Is the site supervisor following procedures established to make meal order adjustments?	<input type="checkbox"/>	<input type="checkbox"/>
13. Are meals served within appropriate time frames?	<input type="checkbox"/>	<input type="checkbox"/>
14. Are all meals served and consumed onsite?	<input type="checkbox"/>	<input type="checkbox"/>
15. Does site have a place to serve children meals in case of inclement weather?	<input type="checkbox"/>	<input type="checkbox"/>
16. Is each meal served as a unit?	<input type="checkbox"/>	<input type="checkbox"/>
17. Is the meal delivery schedule followed?	<input type="checkbox"/>	<input type="checkbox"/>
18. Are there provisions for storing or returning excess meals?	<input type="checkbox"/>	<input type="checkbox"/>
19. Is there documentation of children's income eligibility, if applicable?	<input type="checkbox"/>	<input type="checkbox"/>
20. Is there a nondiscrimination poster, provided by the sponsor, on display in a prominent place?	<input type="checkbox"/>	<input type="checkbox"/>
21. Are meals served to all attending children regardless of the child's race, color, national origin, sex, age, or disability?	<input type="checkbox"/>	<input type="checkbox"/>
22. Do all children have equal access to service and facilities at the site regardless of the child's race, color, national origin, sex, age, or disability?	<input type="checkbox"/>	<input type="checkbox"/>
23. Is informational material concerning the availability and nutritional benefits of the Program available in appropriate translations?	<input type="checkbox"/>	<input type="checkbox"/>

**Explanations:**



## Daily Meal Count Form for the Seamless Summer Option Program

Sponsor/SFA: \_\_\_\_\_

Site: \_\_\_\_\_

Month: \_\_\_\_\_ 20\_\_

Date	No. of Meals Received or Prepared					No. of Reimbursable Meals Served					No. of Incomplete and/or Non-Reimbursable Meals Served to Children					No. of Meals Served to Program Adults					No. of Meals Served to Non-Program Adults					No. of Meals Leftover				
	B	am	L	pm	Sup	B	am	L	pm	Sup	B	am	L	pm	Sup	B	am	L	pm	Sup	B	am	L	pm	Sup	B	am	L	pm	Sup
1																														
2																														
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30																														
31																														
<b>Total</b>																														

Key: B = Breakfast, am = Morning Snack, L = Lunch, pm = Afternoon Snack, Sup = Supper

**South Carolina**  
**School Food Service Program Reference Manual**  
**Contributors: Diane Gillie and Sydney Daigle**  
**Table of Contents**

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# Chapter 27 – Fresh Fruit and Vegetable Program

The Fresh Fruit and Vegetable Program (FFVP) provides all children in participating schools with a variety of free fresh fruits and vegetables throughout the school day. It is an effective and creative way of introducing fresh fruits and vegetables as healthy snack options. The FFVP also encourages the education of families and the creation of partnerships with members of the community as an overall way of improving the health and wellness of both students and those in the community in which they live.

## Goals of the FFVP

The goals of the FFVP are to:

- Create healthier school environments by providing healthier food choices.
- Expand the variety of fruits and vegetables children experience.
- Increase children's fruit and vegetable consumption.
- Make a difference in children's diets to impact their present and future health.

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## Program Administration

At the federal level, the FFVP is administered by the U.S. Department of Agriculture's (USDA's) Food and Nutrition Service. At the state level, the FFVP is administered by the Office of Nutrition Programs, South Carolina Department of Education (SCDE). At the local level, the FFVP is administered by any person designated by the School Food Authority (for example, the food service director, a teacher, a building principal or a school nurse).

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## Program History

### The Farm Security and Rural Investment Act of 2002

The FFVP initially began as a pilot project authorized by congress in 2002. The pilot provided funds to purchase fresh fruits and vegetables in four states and one Indian Tribal Organization for the 2002-2003 school year. The purpose of the pilot was to determine the best practices for increasing fruit (both fresh and dried) and fresh vegetable consumption in schools.

### Child Nutrition and WIC Reauthorization Act of 2004

The success of the pilot resulted in an expansion of the FFVP and made it a permanent program under the Child Nutrition and WIC Reauthorization Act of 2004 in four additional states and two additional schools from Indian Tribal Organizations.

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## Chapter 27 – Fresh Fruit and Vegetable Program

### The Agriculture, Rural Development, Food and Drug Administration, and Related Agencies Appropriations Act of 2006

This act appropriated a one-time funding of \$6 million to further expand the FFVP in six additional states.

### Consolidated Appropriations Act of 2008

The Consolidated Appropriations Act of 2008 expanded the Fresh Fruit and Vegetable Program nationwide and provided approximately \$9.9 million to begin program operations for the 2008-2009 school year.

### The Food, Conservation, and Energy Act of 2008 (Farm Bill)

The Farm Bill amended the National School Lunch Act by eliminating section 18(f) and adding section 19, the FFVP. Section 19 permanently authorized the program nationwide, consolidated all prior operations under section 19 and provided a significant funding increase, beginning with \$40 million in fiscal year 2009.

In July 2008, the FFVP was in operation in selected schools in all 50 states, the District of Columbia, Guam, Puerto Rico and the Virgin Islands.

### FFVP in South Carolina

South Carolina has operated the FFVP for the past five years. With the increase of USDA funding, the number of schools able to participate has increased accordingly. The table below reflects the funding amounts and number of schools participating by year.

School Year	Grant Allocation	Schools Participating
2008-09	\$ 845,918.00	34
2009-10	1,225,145.00	51
2010-11	1,869,917.00	86
2011-12	2,724,946.00	129
2012-13	2,819,802.00	132
2013-14	2,854,277.00	<u>149</u>

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## Chapter 27 – Fresh Fruit and Vegetable Program



### Program Funding

Each participating school is given \$50 per student for the program for the year. Only ten percent or less of the total money received may be used for administrative costs.

### Requirements for Participation

To be selected for participation in the FFVP, schools must:

- Be an elementary school;
- Operate the National School Lunch Program;
- Submit an application for participation (see the “[Application for FFVP Participation](#)” section below);
- Have 50 percent or more of its students eligible for free or reduced-price meals;
- Demonstrate an ability to properly implement and operate the FFVP. SCDE uses the grant application process, and prior participation in the FFVP when applicable, to determine a school’s ability to implement and operate the FFVP. Priority is given to schools with highest percentages of free and reduced price students.

### Application for FFVP Participation

To participate, a grant application provided by the [SCDE Office of Nutrition Programs](#), must be completed for each school that wishes to participate. Applications and grant technical assistance is widely publicized by SCDE and is available online in the [spring](#) of each year. Applications must be completed using the online application process and submitted by the [deadline](#). Applications must be complete and strictly follow all grant guidelines to be considered. Grant funds are awarded based on the highest percentage of free and reduced price student eligibility.

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## Chapter 27 – Fresh Fruit and Vegetable Program

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### Program Requirements

Participating schools are required to:

- Provide a variety of free fresh fruits and vegetables to all enrolled students during the school day, outside of the breakfast and lunch meal periods.
- Have a detailed implementation plan that includes the following information:
  - How the FFVP will be integrated with other efforts to (1) promote health and nutrition, (2) reduce overweight and obesity, and/or (3) promote physical activity. Such a plan is likely to incorporate fresh fruit and vegetable snacks into classroom lessons on a regular basis, a school motto or health and wellness message, and/or a school-wide health and wellness program.
  - How and when the fresh fruits and vegetables will be delivered or given to all enrolled students in the school.
  - How schools will provide the required nutrition education to enrolled students.
- Be familiar with all food safety and Hazard Analysis and Critical Control Point (HACCP) principles for fresh produce.
- Widely and creatively publicize among students and their parents/guardians the availability of free fresh fruits and vegetables.
- Partner with community members to (1) educate students and parents on the benefits and availability of fresh fruits and vegetables and/or (2) provide students with additional fresh fruits and vegetables.
- Spend all funds allocated within the award period. This is a requirement to be eligible to participate in the FFVP during future funding cycles.
- Submit a timely monthly claim for reimbursement using the SCDE online reimbursement payment system.
- Have documented support for the FFVP from the food service manager, food service supervisor/director, principal, and district superintendent.

### Allowable Activities

Grant funds may be used to support the following activities:

- Adjusting the selection of fruits and vegetables to purchase and serve more of students' favorites and avoid items that are unselected, uneaten and wasted.
- Ensuring fruits and vegetables are appealing and easy to grab. If necessary, precut items to make them easier, more appetizing, and neater for children to eat.
- Serving dips with vegetables. If serving dip with vegetable, choose low-fat yogurt-based or other low-fat or fat-free dips. The amount used should be what is commonly noted at a "serving size" (one or two tablespoons) for condiments and as shown on "Nutrition Facts" labels. Consider using prepackaged items that are not as messy as bowls of dip or peanut butter.
- Introducing children to varieties of a fruit (such as Bartlett, Bosc, and Seckel Pears) or a vegetable (Bell, Sweet Banana, and Poblano Peppers).

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## Chapter 27 – Fresh Fruit and Vegetable Program

- Considering and using, if appropriate, more pre-cut fruits and vegetables and pre-prepared trays to control labor costs and address the lack of extra storage space.
- Offering whole fruits on days when staff cannot prepare trays of pre-sliced fruits or vegetables.
- Scheduling the serving of prepared fruits and vegetables as a nutrition education activity.

### Non-Allowable Expenditures

#### FFVP Does *Not* Allow

- Processed or preserved fruits and vegetables (i.e., canned, frozen or dried)
- Dip for fruit
- Fruit or vegetable juice
- Snack type fruit products such as fruit strips, fruit drops, fruit leather
- Jellied fruit
- Trail mix
- Nuts
- Cottage cheese
- Fruit or vegetable pizza
- Smoothies
- Fruit that has added flavorings including fruit that has been injected with flavorings
- Carbonated fruit
- Most non-food items, except those allowed under administrative/operational costs

#### FFVP Limits

- Dips for vegetables
  - If you choose to serve dip with vegetables, make sure to only offer low-fat yogurt-based or other low-fat or non-fat dips
  - The amount used should be what is commonly noted as a “serving size” for condiments, as shown on Nutrition Facts Labels: 1 to 2 tablespoons
- Service of “prepared” vegetables
  - *Fresh* (not canned, frozen, dried or otherwise processed) vegetables that are cooked, must be limited to once-a-week and must always include a nutrition education lesson related to the prepared item

### FFVP Paperwork

Participation in the FFVP requires schools to follow reporting and recordkeeping requirements that are similar to those for the National School Lunch Program (NSLP). Paperwork to be completed and maintained on file includes, but is not limited to, the following:

Schools must keep these documents for a period of three years (after the end of the fiscal year to which they pertain).

#### Reimbursement Claim

Monthly reimbursement claims are due to the State Office by the 10<sup>th</sup> of each month. The claim process is completed using the Office of Nutrition Programs' online payment system. To support the reimbursement claims submitted, invoices detailing purchases of fresh produce, supplies, small equipment, and documentation for labor and fringe benefits paid with FFVP funds should be maintained on file and available for review and/or audit purposes.

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## Chapter 27 – Fresh Fruit and Vegetable Program

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### Production Record

A production record should be maintained to support the purchase and service of fresh fruits and vegetables in the FFVP.

### Administrative Review

FFVP participating schools will be included in the district's Administrative Review process. Any documentation generated during this process should be maintained on file according to District guidelines.

### For Additional Information

For additional information regarding the FFVP, please contact:

FFVP Program Coordinators

Diane D. Gillie  
[dgillie@ed.sc.gov](mailto:dgillie@ed.sc.gov)  
803-734-8193

Sydney Daigle  
[sdaigle@ed.sc.gov](mailto:sdaigle@ed.sc.gov)  
803-734-8045

Office of Nutrition **Programs**  
South Carolina Dept. of Education  
Suite 703-A  
1429 Senate Street  
Columbia, SC 29201  
Fax: (803) 737-4148

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**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Benjamin Madden, SNS  
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# Chapter 28 – Food Distribution Program

The U.S. Department of Agriculture (USDA) provides foods to eligible recipient agencies throughout the U.S. and its territories. The distribution of these food products is called the Food Distribution Program (FDP). The FDP is administered by USDA through its seven regional Food and Nutrition Services (FNS) offices.

## Background of the Food Distribution Program

The FDP began in 1932 during the Great Depression, which left millions of families without purchasing power and the nation's farmers without a market for their products. Malnutrition was widespread. A Senate Resolution in 1932 gave the American Red Cross 40 million bushels of wheat for distribution to needy families. This was one of the earliest Federal Assistance Programs.

The FDP has traditionally been a method of disposing of surplus and price-supported agricultural commodities in order to prevent waste, while at the same time improving the diets of children, low-income persons, and others in need of food assistance.

## Laws Related to the Food Distribution Program

There are three major pieces of legislation which authorize the purchase of most donated foods by USDA agencies to assist needy families and farmers. They are:

1. Section 32 of the Agriculture Act of 1935 which removes surpluses of perishable foods and helps stabilize prices. Section 32 foods can include meat, poultry, fish, fruits and vegetables.
2. Section 6 of the National School Lunch Act of 1946 which provides funds for the purchase of commodities for schools to improve the health and well-being of the nation's youth.
3. Section 416 of the Agriculture Act of 1949 provides funds for removal of certain foods from the commercial market in order to maintain market conditions. Section 416 foods can include dairy and grain products, vegetable oil, shortening, and peanut products.

## Distribution of Commodities

Through these laws, FNS provides commodities to the South Carolina Department of Education (SCDE) and other State Distributing Agencies which then pass them on to eligible recipient agencies. A recipient agency may choose to refuse some of the food (at a maximum of 20% of their entitlement dollars) for which it is eligible. However, once the USDA commodities have been accepted and received into the recipient agency's facility, they must be secured from theft, properly stored, carefully inventoried, and used by the participants for whom they are intended. Appropriate record keeping procedures must be documented and kept on file for three years plus the current operating year. This ongoing process occurs for all foods offered to recipient

agencies through the FDP. If a recipient agency does not want a commodity that has been allocated to them, they must contact SCDE prior to the commodity being received at the commercial distributor. It is imperative that the recipient agency reviews and reconciles the R/A (recipient agency) History Report upon request.

## **Training and Monitoring of Recipient Agencies**

SCDE staff will periodically provide training sessions for recipient agency staff in all aspects of the FDP including onsite technical assistance.

Recipient agencies are monitored by a representative from SCDE and/or a representative from the regional USDA office. The reviewer will monitor the storage facilities, record keeping procedures and documentation of food receipts and usage. If there are items reviewed which are not in compliance with the recipient agency's signed agreement with SCDE, the reviewer will document the noncompliance, offer suggestions for correction, and follow up for compliance within a specified period of time.

## **Care and Storage Practices**

Good care and storage practices are essential for protecting food items after they have been properly received and before and during their use. Under proper conditions, food quality can be maintained. Food loss due to spoilage, waste, contamination, and theft must be kept to a minimum. Every delivery should be checked for possible shortage and/or damage before the foods are accepted and signed for by the school manager.

The space and equipment available for storage is primarily determined by the number of meals served daily. A small recipient agency may have an area, home-style pantry, or kitchen cabinet set aside for dry storage as well as appropriate equipment for refrigerated and frozen storage. A large recipient agency may have an entire room for dry storage and commercial reach-in or large walk-in refrigerated and frozen storage.

Regardless of the size of the recipient agency's storage facilities, USDA commodities may be stored with other foods. The single inventory record keeping system is recommended. Food service management companies are required to maintain a separate inventory system for commodity foods. Proper conditions, recommended storage practices and appropriate records must be maintained by all recipient agencies.

## Chapter 28- Food Distribution Program

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### Monitoring Temperatures

SCDE recommends that all storage areas be monitored for correct temperatures on a daily basis. The date, time, temperature and the name of the person responsible for monitoring should be noted on the temperature storage chart. Form 28-A, Freezer/Cooler Temperature Recording Chart provided in this chapter of the *Program Reference Manual* may be used to record temperatures. Refer to Chapter 30 – Safety & Sanitation for additional information on storage.

Records of the following temperatures should be maintained for three years plus the current year.

<b>Food Type</b>	<b>Examples</b>	<b>Recommended Temperatures</b>
Frozen Foods	Chicken, Beef	-10 to 0°F
Refrigerated Foods	Cheese, Deli Meat	34°F to 41°F (Cold enough to keep food <41°F)
Grains	Flour, Cornmeal	≤ 50°F
Dry Storage	Canned Goods	≤ 70°F

The purpose of the temperature chart is to assist the recipient agency in maintaining the proper conditions for its storage facilities. If there is a significant change in temperature, the recipient agency can take appropriate steps to correct the problem and avoid deterioration and loss of stored commodities. If a loss does occur and negligence is determined, the temperature chart is required as a part of the report. See Form 28-B, Claim Determination or Loss of or Damaged Commodities provided in this chapter of the *Program Reference Manual*. Note that the actual form number is SLP-16 but that forms provided in this chapter are numbered sequentially solely for the purpose of this manual.

As in dry storage, air circulation is important in maintaining optimum temperature and humidity in refrigerated storage. The following guidelines apply:

1. Do not overload shelves.
2. Do not jam or pack foods together.
3. Allow one to two inches of space between the food and the walls of the refrigerator.
4. For walk-ins, do not store food directly on the floor.

Even with proper temperatures and air circulation, the length of time that food can be stored in the refrigerator varies with the type (perishable or sturdy), quality (degree of freshness), and condition (cooked or raw) of the food. Facts about USDA commodities are available to assist the receiving agency with storage time of specific foods. Foods requiring refrigeration are perishable and must be used quickly.

The USDA Commodity Fact Sheets for the School Lunch and Breakfast Programs are available on the internet. The fact sheets can be printed individually or the entire document can be downloaded. The sheets can be accessed on the FDP web site by going directly to [www.fns.usda.gov/fdd/schfacts/](http://www.fns.usda.gov/fdd/schfacts/)

## Chapter 28- Food Distribution Program

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### Summer Storage

#### Dry Foods

The dry storage area often presents a problem during summer months, particularly in hot, humid climates. The quality of flour, pasta and other dry products rapidly deteriorates and their susceptibility to insect infestation greatly increases if proper ventilations and refrigeration equipment is not regulated. Canned items may swell and rust, creating questions about the integrity of the food.

If the recipient agency determines that the dry storage area will be too hot during summer months it should:

1. Keep dry storage inventories to a minimum level.
2. Store canned items in refrigerated storage, if space is available.
3. Freeze items such as flour and cornmeal (even though this shortens shelf life due to moisture absorption) if space is available.

#### Perishable Foods

Infestation, spoilage, deterioration, and contamination of foods usually occur because of malfunctioning refrigeration equipment and improper storage practices. Listed below are desirable storage practices to follow when storing perishable foods during the summer.

1. Foods should be stored only in refrigerators and freezers that are operating properly and in good repair.
2. Refrigerators and freezers should be thoroughly cleaned and dried before foods are placed in storage for the summer.
3. Where walk-in type refrigerators and freezers are used, foods should not be placed directly on the floor. Foods should be placed on pallets or on shelves, with a one to two-inch space left between the walls and the food containers to ensure proper air circulation.
4. Temperatures in the refrigeration equipment should be checked periodically to ensure that they are operating properly. It is desirable that this be done at least twice each week. Malfunctioning equipment should be repaired immediately.

### Commodity Food Loss Guidelines

When the total value of an out-of-condition commodity or loss is \$100 or more and negligence has been determined, submission of Form 28-B, Claim Determination or Loss of or Damaged Commodities (also known as Form SLP-16), is required. The unit value of each commodity may be found on the R/A History Report. It is required that the SLP-16 Report be sent to SCDE within 30 days of the discovery of the loss. The report should include any information and/or explanation concerning the loss and how it occurred. Invoices of repairs to equipment should accompany the report. If the loss was due to theft, a police report must accompany the SLP-16.

Also, temperature records for the time period prior to the loss are required for determination of liability. Although SCDE cannot mandate the daily, year-round monitoring of storage temperatures, all losses which occur because of inadequate temperature control are generally considered to be caused by negligence and are therefore subject to a claim. When such a loss

## Chapter 28- Food Distribution Program

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occurs, the burden of proof will be upon the recipient agency to demonstrate that the lack of proper temperature control was not due to its negligence. Use of Form 28-A, Freezer/Cooler Temperature Recording Chart or a similar log is recommended.

While some losses are unavoidable, some occur due to lack of proper handling or management of the commodities. Losses that could have been avoided may result in the recipient agency being required to replace the food or pay for the loss. If the loss is under \$100 per incident, the loss should be documented, the food disposed of and the lost amount reduced from inventory.

### Use and Sale of Commodities

Commodities are primarily allocated to schools on the basis of the number of lunches served to students, except for designated “bonus” items. Such commodities should be used for the purpose of preparing components of school meals. Commodities may not be used for non-school functions or when consumption is intended to be off-premises. (Refer to Chapter 6 – Meal Service Policies for additional information on the use of federally-funded food in Child Nutrition Programs.)

#### Using Commodity Foods for Teachers & Catering

Q-1 *Can a school sell sweet rolls made with bonus flour in the teacher’s lounge?*

A No. This is not a meal service activity covered under the nonprofit food service account.



Q-2 *Can a school use commodities to prepare banquets for school functions (e.g. banquets for the football team, cheerleaders, honor society, PTA, etc.) or non school functions (e.g. banquets for the Chamber of Commerce, political rallies, etc.)?*

A No. This is not a meal service activity covered under the nonprofit food service account.

## Chapter 28- Food Distribution Program

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### **Use of Commodities for A la Carte Sales**

These commodities may be served as a required component or side dish of their federally-assisted menus, but not as part of a la carte sales. Since bonus commodities can be ordered by schools with no charge against their entitlement they are exempt from the above policy. Bonus commodities may be fully utilized in the participating Child Nutrition Program's (CNP's) á la carte sales lines, regardless of whether or not they are used as a component or side dish in the federally-assisted meals.

USDA has issued a policy concerning the use of USDA commodities in a la carte sales. It is their position that a la carte items sold in conjunction with the National School Lunch Program are to be individual serving items to be consumed on the premises. For example, using commodities to prepare hamburgers and buns to be sold in the a la carte line during meal service would be an acceptable use of commodities. On the other hand, using commodities to bake loaves of bread for sale in the a la carte line would not be a proper use of commodities since loaves of bread would be intended for consumption off-premises.

A USDA commodity such as peanuts may be repackaged and sold as an a la carte item as long as the repackaged food is intended for on-premises consumption.

Funds derived from a la carte sales of items using any donated commodities must accrue to the school's CNP.

### **Using Commodities for Tests**

USDA commodities may be transferred to "bona fide experimental or testing agencies or for use in workshops or for demonstrations or tests relating to the utilization of such donated food by the agency or recipient." No such transfer by any recipient agency shall be made without the approval of SCDE. In addition, if a school district wishes to make such a transfer of commodities or use commodities itself to perform on-site workshops, demonstrations or tests, it is suggested that records be maintained as to: (1) recipes tested, (2) on whom the items were tested and (3) the results of the tests.

## **Your Role in a Disaster**

Hurricanes, tornadoes, floods, chemicals spills, and other disasters may generate a need for congregate (mass) feeding. Irrespective of the type of disaster, the response from USDA, SCDE and School Food Authorities (SFAs) will remain the same.

Any food donated by USDA to SFAs can be used in disaster feeding. Recognizing the emergency and the need to feed people, SFAs and other outlets having USDA donated commodities must cooperate fully and make those foods available to groups involved in disaster activities. The American Red Cross is the primary disaster organization, but USDA directly and through SFAs, will provide foods to any recognized agency equipped to serve disaster victims. The Salvation Army and many religious denominations, civic organizations, unions and others are able to provide food preparation for congregate service.

USDA has no foods specifically designated for disaster feeding and must depend on foods in commercial distributor warehouses, other state agency's inventory and at the SFA. USDA foods are not always available in quantity to fill all needs, but they do provide a good supplement to those provided by the disaster agency.

## Chapter 28- Food Distribution Program

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A specific school may be designated as a shelter. There are many considerations that enter into this selection including size, available facilities, safety factors, protection from storm surge and others. Generally, an all-electric kitchen is not as desirable because of the likelihood of power outages.

### Procedures for Food Distribution System

#### 1. Lines of Communication

School system officials, recipient agency supervisors or designated representatives can place orders with or make requests from commercial distributors. Individual schools should communicate with system supervisors only. When practical, all communications between school districts, recipient agencies and commercial distributors shall be in writing. School system supervisors shall discuss all matters of policy and complaints with state authorities.

#### 2. R/A History Report

The R/A History Report is available online through the SCDE website: <http://ed.sc.gov>. In order to access the RA History Report, you must login through the web site and have been granted privileges to your Report by the state agency. This report will show all donated foods ordered for each recipient. Technical assistance is available from SCDE to discuss the details of this report.

#### 3. Notice of Delivery Schedule – Form FD-3

SFAs will use Form FD-3, which is available as an automatic form provided in the current web-based processing system accessible through the SCDE website, for scheduling the delivery of donated foods to schools and notifying the commercial distributor of the schedule. All contract distributors will be requested to notify SFAs of the system account numbers so that this information can be a permanent part of Form FD-3.

#### 4. Notice of Order Placed – D/O Warehouse Summary

When the state receives an allocation of donated foods from the USDA, the Food Distribution Section prepares a D/O Warehouse Summary, "Notice of Order Placed," and makes it available online to the commercial distributor. This form will indicate the time of origin of the shipment and the quantities allocated to various recipient agencies within a distribution region.

#### 5. Complaint Form

When a customer has a commodity complaint and wants to report this information to the food distribution administrator, Form 28-C, USDA Commodities Complaint Form provided in this chapter of the *Program Reference Manual*, should be completely filled out and forwarded to SCDE.

#### 6. Commodity Adjustment Report

During the course of the school year, adjustments to the allocated quantities are made based on information reported by the distributor on the USDA Adjustment Report. This form is the official form depicting changes to quantities on the R/A History Report. The adjustments are a result of damage, loss, spoilage or other circumstances to commodities and will be reflected on the RA History by the state agency.

### Contact Information

South Carolina Department of Education  
Office of Nutrition Programs  
Food Distribution Program  
1429 Senate Street, Suite 704  
Columbia, SC 29201

Mr. Benjamin J Madden, Education Associate III  
Phone: (803) 734-8209  
E-mail: BMadden@ed.sc.gov

Ms. Lorraine Wells, Program Assistant  
Phone: (803) 734-0897  
E-mail: LWells@ed.sc.gov

## Freezer/Cooler Temperature Recording Chart

Name of Recipient Agency: \_\_\_\_\_ Month/Year: \_\_\_\_\_

Day of Month	Time	Temperature				Initials
		Freezer #1	Freezer #2	Cooler #1	Cooler #2	
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
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South Carolina Department of Education  
Office of Nutrition Programs  
Food Distribution  
**USDA Commodities Complaint Form**

Recipient Agency (R/A) Name \_\_\_\_\_

Date \_\_\_\_\_

R/A # \_\_\_\_\_

Phone ( \_\_\_\_\_ ) \_\_\_\_\_

Address \_\_\_\_\_

Fax ( \_\_\_\_\_ ) \_\_\_\_\_

Contact Person \_\_\_\_\_

Title \_\_\_\_\_

Commodity/ Commodity Code	DO#	Vendor	Lot Number	Box Number	Pack Date	Date Product Received	Amount Received	Cases on Hand	Location of Product	Description of Problem / Complaint (Please type or handwritten legibly)	State Office Use Only	
											Contract Number	N/D Number

Please forward available samples or foreign materials along with this complaint form.

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Contributors: Julia A. Hartwell, Ph.D.  
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# Chapter 29 –Food Service Related Programs

This chapter includes information about food services allowed and not allowed beyond the Child Nutrition Programs (CNPs), charter schools, the Special Milk Program and the policy on removing food from the food service area.

## Additional Services Offered

Many School Food Authorities (SFAs) consider expanding their services beyond the provisions of the School Breakfast Program, National School Lunch Program, Afterschool Snack Program, and summer feeding programs. The additional services being offered by many SFAs may be classified either as “expanded program activities” or as “non-program activities.” CNP regulations and guidelines must be considered when SFAs expand their areas of service.

### Expanded Program Activities

Expanded program activities include CNP managed:

- A la carte service to students;
- A la carte or catered meal service to SFA personnel and occasional visitors from outside the SFA such as parents; or
- Contracted catering of meals to other schools (for example, Head Start or charter schools).

These services may be provided in the form of additional sales to adults and students from the standard reimbursable meal line, special lines, canteen areas offering a la carte items, or meals catered at school organization functions that include students in attendance at the function. Although these services do not involve provision of a reimbursable meal, they represent opportunities to provide service to the SFA population and increased revenue for the local CNP.

In general, the food service account may be legitimately used to provide for expanded program activities, including the purchase of food items and supplies, use of commodities, and labor. The charge to the customer for these activities must cover all costs involved in providing the service. All revenues from these sales must accrue to the food service account. Regulations and guidelines pertaining to these activities must be implemented by the SFA, and may be found in the following chapters of this *Program Reference Manual*:

- Chapter 7: Meal Pricing
- Chapter 8: Use of Child Nutrition Program Funds
- Chapter 22: Competitive Foods Policy
- Chapter 28: Food Distribution Program

### Non-Program Activities

Examples of non-program activities include, but are not limited to:

- Competitive foods sold in the cafeteria by other school organizations;
- Vending machines owned, stocked, and operated by the school/school district;
- Catering services provided to groups with no students in attendance at the meeting catered; and
- Meal services provided to outside groups.

Examples of “outside groups” include:

- Elder care services;
- Preschool or daycare programs not operated by the SFA;
- Outside adult groups meeting on or off SFA property such as the Rotary Club; and
- Outside businesses located close to the school with employees in need of meal services.

Non-program activities may **never** be supported by funds from the food service account. Federal regulations (7 CFR 210.14(a)) state that revenues received by the nonprofit CNP are to be used only for the operation or improvement of the food service operation. There are no exceptions to this requirement. This requirement extends to the use of any foods provided through the food service account regardless of where they may be sold. Therefore, should the school/SFA decide to participate in non-program activities, this may only be done through a full cost accounting system that excludes the use of program food items, commodities, supplies, or labor. In addition, procurement bid pricing cannot be used to support these activities and a separate procurement process should be used for these activities. State and local sales taxes must be charged for these activities.

Because non-program activities are not supported by or operated from the food service account, revenues from these activities could accrue to the CNP, the school or its approved student organizations.

Additional guidance on this topic may be found in the following chapters of this *Program Reference Manual*:

- Chapter 7: Meal Pricing
- Chapter 8: Use of Child Nutrition Program Funds
- Chapter 22: Competitive Foods Policy
- Chapter 28: Food Distribution Program

### Revenue Sharing

The regulations allow the CNP to enter into profit-sharing arrangements with approved school organizations. However, these arrangements must ensure that the nonprofit food service account:

- Is reimbursed for all costs incurred “up front,”
- Receives its proportionate share of the profits, and
- Is not harmed in any way by the activity.

The Southeast Regional Office (SERO) of the U.S. Department of Agriculture (USDA) has determined that revenue sharing requires the SFA to have an accurate and auditable full cost accounting system to track and allocate both direct and indirect costs and revenues, and that the nonprofit CNP be insulated from the possibility of a loss on the venture. Because SERO has overriding concerns in protecting the quality of meals served to children, they require the South Carolina Department of Education (SCDE) to:

- Certify that the SFA’s accounting system is capable of appropriately tracking and attributing costs and revenues;
- Certify that the nonprofit CNP will be protected from losses from the venture(s); and
- Monitor these situations and systems closely to ensure that the nonprofit CNP is protected.

SFAs sharing revenue under this practice are audited for the above requirements through the single audit mechanism.

### Auditing of Shared Revenue Canteen Operations

The single audit protocol requires auditors to ascertain that:

- All canteen operations managed by the CNP are operated strictly on a vending-type arrangement, where all costs incurred plus profit must be taken “up front” monthly by the CNP acting in the capacity of vendor. This includes all vended products, prepackaged, and prepared foods.
- Once the initial vending has occurred and “up front” charges are taken, ensure that no cash has been transferred from the Pupil Activity Fund back to the Food Service Fund. Ensure that no splitting of profits, predetermined or otherwise, is occurring in this type of operation.
- All CNP costs incurred in vending to the canteen operation for purchased food, supplies, and USDA commodities are not reflected on the reimbursement claim.
- All profits received from managing the canteen operation by the CNP program are posted in the General Ledger under account number 1992 and reported on the monthly claim under “Other - Local Revenue.” (See [Chapter 9 – Financial Records & Reporting](#) in this *Program Reference Manual* for additional information.)
- The Canteen Fund is closed to the Pupil Activity Fund at year-end.

### Charter Schools

Although charter schools are exempt from many state laws and regulations, they are not exempt from federal regulations regarding the CNPs. If a charter school decides to participate in the School Breakfast Program, National School Lunch Program, Afterschool Snack Program, or Special Milk Program, it must follow all program regulations pertaining to the respective program.

#### Options for Providing Meals

Charter schools have four options for providing meals:

- Option 1: Participate in one or more of the CNPs listed above as a cafeteria site under the local SFA/SC Public Charter School District.
- Option 2: Participate in one or more of the CNPs listed above as an independent SFA, if deemed eligible by the SCDE Office of Nutrition Programs. Contact the SCDE Office Nutrition Programs at (803) 734-8188 for information and application forms.
- Option 3: Arrange for alternate, catered meal service through the local school district's non-profit food service operation on an a la carte basis or through an outside vendor. Note that if an outside vendor is used, the vendor must be selected through a statewide competitive bid process based on a formal procurement food service management contract through the SCDE Office Nutrition Programs .
- Option 4: Choose to operate a meal service program that does not involve CNP programs.

#### Claiming

A SFA that lists a charter school as a cafeteria site will be responsible for claiming and receiving federal reimbursement for meals served at the charter school.

A charter school classified as an independent SFA will have its own program agreement and will be considered its own SFA. The charter school, in this instance, would be responsible for claiming and receiving federal reimbursement.

### Special Milk Program

The Special Milk Program (SMP) was first authorized in 1954. In 1966 it was included as part of the Child Nutrition Act. The program provides a subsidy for milk served to eligible children.

The SMP is only available to schools and institutions that do not participate in any other CNP, and for split-session kindergarten and pre-kindergarten children who do not have the option of breakfast or lunch at school.

The law does not include split sessions for any age or grade levels other than kindergarten and pre-kindergarten programs. Regulations define a split session as “an education program operating for approximately one-half of the regular school day.” Schools with kindergarten sessions lasting longer than one-half day are not eligible to participate in the SMP.

#### Application for Participation

Schools and institutions that would like to participate in the SMP must complete the Special Milk Program Agreement (Form 29-A) and the Application to Participate in the Special Milk Program (Form 29-B) provided at the end of this chapter of the *Program Reference Manual*. The completed forms must be submitted to the Office of Nutrition Programs, SCDE.

### Comparison of Options

Eligible SFAs have three options for providing milk to students.

1. Paid Milk Only – Milk is provided to all students for a small fee (an amount which covers the cost of providing the milk).
2. Paid and Free Milk – Students eligible for free CNP benefits receive milk at no cost and those who are not eligible for free CNP benefits pay a small fee to cover the cost of it.
3. Non-Pricing SMP – All students receive free milk (although an enrollment fee may be charged to cover the cost of books, supplies, snacks and the milk).

Table 29.1 - Overview of Special Milk Program Options provides additional information on these three options.

### Milk Service Accountability

The accountability system used must allow for a point-of-service count of the milk served. The number of milk units served by eligibility category can be recorded on the Daily Record of Milk Served and Income Received (Form 29-C) or the Daily Record of Special Milk Served (Form 29-D). Form 29-D is for use by SFAs participating in the SMP for split session pre-kindergarten and kindergarten students. For additional information on accountability requirements, refer to Table 29.1 - Overview of Special Milk Program Options and to Chapter 12 – Counting and Claiming in this *Program Reference Manual*.

### Claim for Reimbursement

SFAs using the “Paid Milk Only” or “Non-Pricing SMP” options may claim reimbursement at the current paid rate for milk served to students. SFAs using the “Paid and Free Milk” option may claim milk at either the current free or paid milk reimbursement rate, according to the eligibility category of the child who received each milk. Reimbursement is not available for milk served to adults. Reimbursement is received for milk served to eligible students by uploading reimbursements into the SC Automated Payment System (SCAPS).

**Table 29.1 – Overview of Special Milk Program Options**

	<b>Cost Paid by Household</b>	<b>Reimbursement</b>	<b>Other Rules and Regulations</b>	<b>Accountability</b>
<b>Paid Milk Only</b>	<p>All participating children receive milk for the same established price, regardless of their eligibility status.</p> <p>Compute the milk charge using the following formula:</p> $\begin{array}{r} \text{Cost of milk from the supplier} \\ + \text{ Approx. cost of straw \& napkin} \\ - \text{ Paid milk reimbursement rate} \\ = \text{ Milk price charged to student} \end{array}$	<p>Reimbursement is paid for half-pints of milk served to participating students at the established rate for “paid milk” set annually by USDA.</p>	<p>Program must be operated in a non-profit manner. Revenues the SFA collects from households and reimbursements received from SCDE should not exceed the total cost of providing the milk to students.</p>	<p>For “Paid Milk Only” programs, accountability can be very simple. The person serving the milk must count the number of milk units served to students. This person can be a classroom teacher, aide or CNP staff member.</p>
<b>Paid and Free Milk</b>	<p>Milk is offered at no charge to students from households who are eligible for free CNP benefits.</p>	<p>Free milk reimbursement is received for those children who are eligible. The free milk reimbursement is the average cost the SFA pays per half-pint of milk. A lower “paid” reimbursement rate is received for other students who participate in the SMP.</p>	<p>SFAs who wish to participate in the “Paid and Free Milk” option must make the “Free and Reduced-Price School Meals Family Application” and “Parent Guardian Letter” (See <a href="#">Chapter 3 – Policy Statement</a>, Attachments B and C) available to all parents or guardians of enrolled students.</p>	<p>For “Paid and Free” milk programs, the accountability system must allow for the number of paid and free milk units served to be counted. The system used must ensure that the eligibility category of students eligible for free milk is not overtly identified. Accountability systems that may be approved include coded paper tickets, coded rosters, computerized bar coded milk cards and computerized bar coded rosters. (See <a href="#">Chapter 12 – Counting and Claiming</a> in this <i>Program Reference Manual</i> for additional information on acceptable accountability systems.)</p>
<b>Non-Pricing Special Milk Program</b>	<p>A SFA can provide milk at no charge to <b>all</b> eligible students participating in the SMP.</p>	<p>If a non-pricing program is offered, the SFA can claim only the paid milk reimbursement rate for milk served to all participating students. Other SFA funds must be used to cover the remaining costs of providing milk.</p>	<p>SFAs may charge an enrollment fee to cover the cost of books, supplies, snacks and milk and still participate in the non-pricing SMP.</p>	<p>For “Non-Pricing SMPs,” accountability can be very simple. The person serving the milk must count the number of milk units served to students. This person can be a classroom teacher, aide or CNP staff member.</p>

### **Semester or Annual Fees for Milk**

Q-1 *May a school charge a flat fee for the semester or school year for Special Milk for their students?*

A Yes. A school may compute the cost of Special Milk over the semester or school year and charge the student at the time of enrollment.

### **Milk Allergies**

Q-2 *When a student is allergic to milk and is served juice in its place, is the SFA reimbursed for the juice served?*

A No. In the SMP, SFAs are reimbursed only for milk served. For more information on substitutions for milk allergies, see Chapter 21 – Students with Special Dietary Needs.

### **Milk Served Occasionally to Kindergarten/Pre-Kindergarten Students**

Q-3 *On occasions when a kindergarten or pre-kindergarten student who normally does not have a meal available to him/her eats a school breakfast or lunch, is the milk served during the class reimbursable under the Special Milk Program?*

A No. Only milk served to split session kindergarten or pre-kindergarten students who do not have a breakfast or lunch available qualifies for the reimbursement. On that day, the student's milk would not be claimed for reimbursement.

### **Participation for Afternoon but no Morning Kindergartens**

Q-4 *When the morning kindergarten class is offered breakfast and afternoon kindergarten class does not have lunch available to them, can the SFA participate in the Special Milk Program for the afternoon kindergarten class and not the morning kindergarten class?*

A Yes. Only the milk served to the afternoon kindergarten class would be claimed for reimbursement because they have no other program available to them. The SFA must take into consideration that the milk served to the morning kindergarten class will not have the reimbursement subsidy. The SFA would decide whether to charge the morning students the higher price for the milk or pay for that milk from some other source.

### **Food Taken From Schools**

The breakfast and lunch programs are designed to serve children. No food, not even leftover food, is to be taken from the premises, unless the food has been purchased and the proceeds deposited in the food service account. In addition to the food being misused, taking food from the lunchroom may cause a serious public relations problem by causing people to lose faith in the integrity of the program(s). The above does not prohibit students or adults from taking all or portions of their own breakfasts or lunches purchased or provided free to eligible students from the cafeteria if approved by the local school.

## SOUTH CAROLINA STATE DEPARTMENT OF EDUCATION SPECIAL MILK PROGRAM AGREEMENT

In order to effectuate the purpose of the National School Lunch Act (42 U.S.C.-1751-1960), and the regulations for the Special Milk Program issued thereunder, the South Carolina Department of Education, hereinafter referred to as the "Department," and Sponsor, whose address is \_\_\_\_\_  
City of \_\_\_\_\_, State of South Carolina, hereinafter referred to as the "Sponsor," covenant and agree as follows:

### **THE DEPARTMENT AGREES THAT:**

To the extent of funds available, the Department shall reimburse the Sponsor in connection with the cost of providing milk in the schools/institutions/camps listed on the attached Application/Claim in the fiscal year during which this Agreement is in effect.

### **THE SPONSOR AGREES THAT:**

It will supervise Special Milk Program operations in the sites listed in the Application and will require each program site to:

1. Keep, or cause to be kept, up-to-date, accurate and full records of all operations under the Special Milk Program as prescribed by the Department, and the copies of all records will be kept by the sponsor and will be available for inspection by properly authorized persons at any reasonable hour of the day. Records will be maintained for a period of three years after the end of the fiscal year to which they pertain or until resolution if audit findings are not resolved.
2. Operate a non-profit milk program for the benefit of children, and ensure that all funds accruing from the operation of the program will be used in the Special Milk Program. Operating balance will be limited to a level consistent with program needs; and upon request by the Department the Sponsor will explain the need for a higher level.
3. Maintain adequate facilities for storing, preparing, and serving food, and to ensure proper sanitation and health standards conforming to laws and regulations by the South Carolina State Department of Health and Environmental Control.
4. Assure that income shall be used only for authorized purposes.
5. Claim reimbursement at the current rates for paid or free milk as appropriate served only to eligible children and establish a system for obtaining on a daily basis an accurate count of milk served at the point-of-service.
6. Comply with Section 210.19a Procurement Standards in establishing procedures for the procurement of supplies, including food, equipment, and other services with program funds.
7. Complete claims review process and submit reports and claims for reimbursement in accordance with procedures established by the Department. Agree that the Sponsor official signing the claim is responsible for reviewing and analyzing milk counts to ensure accuracy.
8. Acknowledge that failure to submit accurate claims will result in the recovery of an overclaim and may result in the withholding of payments, suspension or termination of the program and that if failure to submit accurate claims reflects embezzlement, willful misapplication of funds, theft, or fraudulent activity, the penalties specified in Part 210.5 of the regulations shall apply.
9. Adhere to the Assurances stated below:

"The Sponsor hereby agrees that it will comply with Title VI of the Civil Rights Acts of 1964 (42 U.S.C. 2000d et seq.), Title IX of the Education Amendments of 1972 (20 U.S.C. 1681 et seq.), Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.); all provisions required by the implementing regulations of the Department of Agriculture; Department of Justice Enforcement Guidelines, 28 CFR 50.3 and 42; and FNS directive and guidelines, to the effect that, no person shall, on the grounds of race, color, national origin, sex, age or disability be excluded from participation in, be denied benefits of, or otherwise be subject to discrimination under any program or activity for which the program applicant receives Federal

financial assistance from FNS; and hereby gives assurance that it will immediately take measures necessary to effectuate this agreement.

By accepting this assurance, the program applicant agrees to compile data, maintain records and submit reports, as required, to permit effective enforcement of the nondiscrimination laws and permit authorized USDA personnel during normal working hours to review such records, books and accounts as needed to ascertain compliance with the nondiscrimination laws. If there are any violations of this assurance, the Department of Agriculture, Food and Consumer Service, shall have the right to seek judicial enforcement of this assurance. This assurance is binding on the program applicant and its successors, transferees and assignees, as long as they receive assistance or retain possession of any assistance from the Department. The person or persons whose signatures appear below are authorized to sign this assurance on behalf of the program applicant.”

**THE DEPARTMENT AND THE SPONSOR MUTUALLY AGREE THAT:**

1. The Application listing of sites approved by the Department shall be part of this Agreement.
  2. Sites may be added or deleted from the Application as need arises, and the references herein to the Agreement shall be deemed to include such schedule as supplemented and amended.
  3. The Department shall promptly notify the Sponsor of any changes in the Special Milk Program requirements or the assigned rate of reimbursement.
1. This Agreement may be terminated upon ten (10) days written notice on the part of either party hereto, and the Department may terminate this Agreement immediately after receipt of evidence that the terms and conditions of the Agreement have not been fully complied with by the Sponsor.

\_\_\_\_\_  
(School Food Authority/Sponsor Representative)

\_\_\_\_\_  
(Date)

**FOR STATE OFFICE USE ONLY:**

APPROVED: \_\_\_\_\_ (Director, Office of Nutrition Programs)

\_\_\_\_\_ (Date)

# Application to Participate in the Special Milk Program

South Carolina Department of Education

20\_\_-20\_\_

Name of Sponsor/SFA: \_\_\_\_\_

Contact Person: \_\_\_\_\_ Title: \_\_\_\_\_

Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Mailing Address  
(if different from above): \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Telephone Number: \_\_\_\_\_ Fax: \_\_\_\_\_

E-mail Address: \_\_\_\_\_

Sponsor Number: \_\_\_\_\_ Enrollment: \_\_\_\_\_

Average half-pints that will be served each month: \_\_\_\_\_ Average dairy cost per half-pint: \_\_\_\_\_

Program Option:     Paid Milk Only     Paid and Free Milk     Non-Pricing Special Milk Program

List participating site(s): \_\_\_\_\_

\_\_\_\_\_  
(School Food Authority/Sponsor Representative)

\_\_\_\_\_  
(Date)

### Send completed application to:

Office of Nutrition Programs  
South Carolina Department of Education  
Suite 708-C  
1429 Senate Street, Columbia, SC, 29201  
or  
Fax to (803) 737-4148

**FOR STATE OFFICE USE ONLY:**

**APPROVED:**

\_\_\_\_\_  
(Director, Office of Nutrition Programs)

\_\_\_\_\_  
(Date)

## Daily Record of Milk Served and Income Received

For use by SFAs participating **only** in the Special Milk Program

School: \_\_\_\_\_ Month: \_\_\_\_\_ Year: \_\_\_\_\_

Day of Month (a)	Units Delivered (b)	Student Milk			Adult Milk	Milk Income	
		Paid Units Served (c)	Free Units Served (d)	Total Units Served (e)	Units Served (f)	Sales to Students (g)	Sales to Adults (h)
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
22							
23							
24							
25							
26							
27							
28							
29							
30							
31							
<b>TOTAL</b>							

Milk Inventory: A \_\_\_\_\_ Opening Inventory = Number of half-pint units carried over from the preceding month  
 B \_\_\_\_\_ Total Units Delivered = Total of column (b) above  
 C \_\_\_\_\_ Total Units Available = A + B  
 D \_\_\_\_\_ Total Units Served to Students and Adults = Total of columns (e) and (f) above

## Instructions for Completing Daily Record of Milk Served and Income Received

Use of this form is recommended. If alternate forms are developed and used, they must collect the same information. Complete this, or a similar form, daily. Give the completed form to the authorized representative for preparation of reports. The data reported in each column is necessary for computing reimbursement.

### Column

a.....Omit dates milk is not served.

b.....Enter total number of ½-pint milk units delivered.

c.....Enter number of ½-pint milk units served to students **not** approved for Free Milk benefits. If students do not pay for milk because other program funds are used, milk served to students not approved for Free Milk is to be recorded as Paid Milk.

d.....Enter number of ½-pint milk units served to students who are approved for Free Milk benefits.

e.....Total columns c and d.

f.....Enter total number of ½-pint milk units served to adults.

g.....Enter the amount of income for milk served to students for each day money is received. There may be as many entries as the maximum number of school days or as few as one per month.

h.....Enter the amount of income for milk served to adults for each day money is received. There may be as many entries as the maximum number of school days or as few as one per month.

**Milk Inventory:** On the last day of the month, the number of milk units carried over to the next month must be counted and recorded. Fill in the blanks and use the formula provided to compute the closing inventory. The computed closing inventory should be equal to the physical inventory of milk units.

## Daily Record of Special Milk Served

For use by SFAs participating in the Special Milk Program for split session Pre-Kindergarten and Kindergarten students

School: \_\_\_\_\_ Month: \_\_\_\_\_ Year: \_\_\_\_\_

Maximum number pre-K and K students approved for SPECIAL MILK on any day during month: **Paid:** \_\_\_\_\_ **Free:** \_\_\_\_\_ **Total:** \_\_\_\_\_

Use of this form is recommended. If alternate forms are developed and used, they should collect the same information.

Complete this, or a similar form, daily. At the end of the month, make the completed form available to the authorized representative for preparation of reports. The data is necessary for computing the reimbursement claim.

**Maximum Number**..... Enter the maximum number of pre-kindergarten and kindergarten students eligible for Paid and Free Special Milk.

**Column**

- a Omit dates milk is not served.
- b Enter number of Paid Milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program.
- c Enter number of Free Milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program. If students do not pay for milk because other program funds are used, milk served to students not approved for Free Milk is to be recorded as Paid Milk.
- d Enter total number of milk units served to pre-kindergarten and kindergarten students participating in the Special Milk Program.
- e Enter number of milk units served to adults.
- f Local use column
- g Local use column

Day of Month (a)	Special Milk		Total Milk (d)	Adult Milk	Local Use (f)	Local Use (g)
	Pre-K & K Paid Milk (b)	Pre-K & K Free Milk (c)		Adult Paid (e)		
1						
2						
3						
4						
5						
6						
7						
8						
9						
10						
11						
12						
13						
14						
15						
16						
17						
18						
19						
20						
21						
22						
23						
24						
25						
26						
27						
28						
29						
30						
31						
<b>TOTAL</b>						
	<b>Total Days Special Milk Served</b>					



**South Carolina**  
**School Food Service Program Reference Manual**  
**Contributor: Gregg Ferguson**  
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# Chapter 30 – Safety & Sanitation

Child Nutrition Program (CNP) employees are entrusted with the health and safety of the students and staff they serve. It is therefore absolutely essential that all employees are equipped with a thorough understanding of how to keep food and people safe in the kitchen.

Federal, state, and local laws require CNP employees to maintain proper sanitation and health standards. An overview of the requirements is provided in this chapter of the *Program Reference Manual*. For additional information on food safety topics and for training materials, refer to Chapter 32 – Resources.

The Office of Nutrition Programs, South Carolina Department of Education (SCDE) recommends that all safety and sanitation practices required of employees also be followed by other student, staff and community groups or organizations that use a School Food Authority's (SFA's) food service facility.

## Federal Requirements

Section 111 of the Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108-265) amended section 9(h) of the National School Lunch Act by requiring SFAs to:

1. Implement a food safety program for the preparation and service of school meals in the school year beginning July 1, 2006. The program must be based on Hazard Analysis and Critical Control Point (HACCP) principles and conform to guidance issued by the U.S. Department of Agriculture (USDA).
2. Request two food safety inspections from the South Carolina Department of Health and Environmental Control (DHEC) each school year for each site participating in the school lunch or breakfast program.
3. Publicly post the most recent food safety inspection and make a copy of the inspection report available to the public upon request.

### HACCP

HACCP is a systematic approach used to construct a food safety program designed to reduce the risk of food borne hazards by focusing on each step of the food preparation process--from receiving to service. Following USDA's recommendation, South Carolina schools use the Process Approach to HACCP. Using this approach, all foods served are divided into four broad categories based on the number of times the food moves through the temperature danger zone and the level of danger the food presents.

### Food Safety Plan

Each SFA must have a comprehensive food safety program with a written plan for every school food preparation and service site. South Carolina schools must write their food safety plan using the guidance provided by Dr. Angela Fraser, Associate Professor/Food Safety Education Specialist, Clemson University at the following web site:

<http://www.foodsafetysite.com/foodservice/conducting/SCSchools/SCSchoolsHome>

For assistance with writing or modifying your plan, use the information provided at the above website, contact SCDE at (803) 734-8188, or see the food safety resources listed in Chapter 31 – Resources. Note that the web site given above also provides several monitoring forms.

## **State Requirements**

### **S.C. Department of Health and Environmental Control**

All food service facilities in South Carolina, including school food service operations, are required to follow the procedures in DHEC's Food Code. This publication is titled the "Retail Food Establishments Regulation 61-25" and governs all food preparation, service and storage in an establishment. Each school is encouraged to obtain a copy of it by contacting DHEC's Food Protection Division at (803) 896-0640 or by downloading a copy from DHEC's website at [www.scdhec.gov/health/envhth/food\\_protection](http://www.scdhec.gov/health/envhth/food_protection).

### **S.C. Department of Education**

The Office of Nutrition Programs, SCDE is responsible for ensuring that all federal regulations are followed by SFAs. Food safety is therefore evaluated as part of reviews conducted by SCDE staff.

### **Food Safety Training is Available**

Two, two- four and ten hour HACCP classes are available for Food Service Directors and their staff. For additional information, contact your education associate in the Office of Nutrition Programs.

## **Local Requirements**

Local SFAs have the authority to establish rules that are stricter than the federal and state regulations. For example, federal and state regulations require that CNP employees wear closed toe shoes but do not address the back of the shoe. For safety reasons, the Food Service Director or Supervisor may choose to require that all staff wear closed toe and closed heeled shoes.

## **Employee Safety**

Although Child Nutrition Program regulations do not address employee safety, school kitchens and large equipment can be very dangerous. It is in the best interest of each SFA to ensure that all CNP employees, and others who may use the kitchen facilities, know how to prepare and serve food safely.

## **Knife Safety**

### **Using Knives**

- Never play with knives or other sharp tools.
- Concentrate on what you are doing when using a knife.

- Use sharp knives. Dull blades cause more accidents because they are harder to work with and require more pressure.
- Always use a cutting board. Do not cut or slice foods while holding them in your hand.
- Keep knives away from the edge of the counter to lessen the chance of their being knocked on the floor or on someone's foot.
- Step out of the way if a knife is dropped. Do not try to catch it.
- Use a knife for its intended purpose. Do not use it as a substitute for a can opener, screwdriver, staple remover or box opener.
- Carry a knife by the handle with the tip pointed down and the blade turned away from the body.
- Keep knife handles free of grease or other slippery substances. Repair or throw away knives with loose handles.
- Choose a knife that is the correct size and has the proper blade for the job to be done.

### **Washing and Storing Knives**

- Wash knives and sharp tools when you finish using them. Never put them in sinks of soapy water where they cannot be seen.
- Keep the sharp edge of the knife away from you when washing or drying it.
- Store knives in a knife rack or special knife drawer when not in use. Don't throw them in a drawer with other small objects. Don't leave them lying around.

## **Preventing Slips and Falls**

- Wear low-heel shoes with non-skid soles.
- Clean up food, water and grease spills immediately.
- Pick up what you drop. Wipe up what you spill.
- Place "Wet Floor" or "Caution" signs on wet or slippery floors.
- Walk – don't run – in the food service area, even when you are in a hurry.
- Stand on a sturdy ladder or step stool instead of boxes or lower shelves to get out-of-reach items.
- Remove clutter from aisles and pathways.
- Avoid twisting your body and losing your balance when reaching for an item.
- Close cabinet doors and drawers.
- Cover containers when moving them to avoid spills.

- Use carts instead of trays when practical.
- Open and approach swinging doors carefully.
- Make sure you can see where you are going.
- Report any major on-going hazards to your manager immediately.

## Preventing Fires

### Daily Checklist

- Freezer doors without emergency escape knob locked out in the open position
- Exhaust fans running when any cooking equipment is turned on
- Ensure the equipment is aligned properly under hood system
- No combustibles under the hood
- Manual pull stations not blocked
- Portable fire extinguishers in charge position
- Portable fire extinguishers not blocked
- All boxes empty or full shall not be blocking exits, exits egress, or exit discharge area
- Check for high storage in dry food storage
- Watch for trip hazards
- Exit lights are illuminated

### Using a Fire Extinguisher

- Know the types available
  - A - Common materials such as paper, wood and most other combustibles
  - B - Flammable liquids such as gasoline, paint remover or grease
  - C – Electrical fires
  - D – Combustible metals usually found in industry
- Remember PASS word:
  - **Pull** the pin.
  - **Aim** the extinguisher nozzle at the base of the flames.
  - **Squeeze** the trigger while holding the extinguisher upright.
  - **Sweep** the extinguisher from side to side, covering the area with the extinguishing agent.

## First Aid Suggestions

### Treating Cuts

- Apply direct pressure to the wound with a clean cloth or sterile gauze pad.
- Elevate the wound above the heart, if possible, unless you suspect a broken bone.

- Maintain pressure and elevation until bleeding has stopped.
- If the cloth or pad becomes soaked with blood, apply another directly over the first.
- If the bleeding has stopped, gently wash the wound with soap and water; Repeat pressure and elevation if bleeding starts again.
- rinse well.

### **Treating Minor Burns**

- Relieve pain by running cold water over burned area or by applying a clean soft pad of gauze that has been soaked in cold water.
- Gently blot dry.
- Cover loosely with a dry sterile gauze pad, if necessary.
- Do not use ice, ice water, butter, grease, ointment or other medications on burns.
- Do not try to remove burned clothing if it seems to be stuck to the skin.
- Get medical help for more serious burns.

### **Treating Sprains and Bruises**

- Apply ice pack or ice wrapped in cloth to the injured area.
- Elevate the affected area until it is above the level of the heart, if possible.
- Do not allow the injured person to walk or put weight on a leg if the ankle or knee is sprained.
- Encourage injured person to get medical help.
- If you think a bone has been broken, get medical help right away.
- Do not move anyone who has a possible back or neck injury unless absolutely necessary.

## **Lifting Techniques to Help Protect Your Back**

- Stand close to the object to be lifted.
- Get a firm footing
- Bend your knees, not your back.
- Grasp the object firmly and hold it close to you.
- Use leg muscles for lifting, not back muscles. Lift smoothly as you straighten your legs.

- Make sure you can see where you are going.
- Turn by moving your feet, not by twisting your body.
- Ease the object into its resting place.
- Always get help when moving heavy loads or lifting objects over your head.
- Use carts when possible.

## Food Borne Illness Report Form

1. Student's Name: \_\_\_\_\_ Home Phone: \_\_\_\_\_  
 Parent's Name: \_\_\_\_\_ Work Phone: \_\_\_\_\_  
 School: \_\_\_\_\_ Grade: \_\_\_\_\_ Teacher: \_\_\_\_\_

2. Description of Illness (Record details exactly as stated):

3. Symptoms:   nausea           vomiting           diarrhea           fever           Other: \_\_\_\_\_  
                   dizziness        headache        blurry vision    cramps        Other: \_\_\_\_\_  
                   How long did symptoms last? \_\_\_\_\_ Onset: Date: \_\_\_\_\_ Time: \_\_\_\_\_

4. Doctor or Treatment Facility: \_\_\_\_\_  
 Diagnosis: \_\_\_\_\_  
 Treatment Received: \_\_\_\_\_

5. Beginning with the day you became ill, describe all the food/drinks consumed in the last 72 hours:

**Day 1:**           Day \_\_\_\_\_           Date \_\_\_\_\_

<b>Breakfast:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Lunch:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Dinner:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Snacks:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____

**Day 2:**           Day \_\_\_\_\_           Date \_\_\_\_\_

<b>Breakfast:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Lunch:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Dinner:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Snacks:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____

**Day 3:** Day \_\_\_\_\_ Date \_\_\_\_\_

<b>Breakfast:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Lunch:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Dinner:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____
<b>Snacks:</b>	Place eaten: _____ List all foods eaten: _____	Time: _____

6. Has there been any evidence of a virus or other illness in your family recently? Yes \_\_\_\_ No \_\_\_\_  
If yes, describe. \_\_\_\_\_

7. Have any of your friends become ill from eating the same foods? Yes \_\_\_\_ No \_\_\_\_  
If so, who? \_\_\_\_\_

8. Have you missed any school time recently due to illness? Yes \_\_\_\_ No \_\_\_\_  
If yes, describe. \_\_\_\_\_

9. What class were you in when you first noticed you were sick? \_\_\_\_\_

10. Do you like that class? \_\_\_\_\_

11. Are/were you worried about anything (such as a test in the class) when you became ill?

<b>FOR SFA Office USE ONLY:</b>
Interviewer's Name: _____ Title: _____
Date Report Completed: _____
Follow-up Conducted by: _____
Was the Health Department Called? Yes ____ No ____ Date/Time: _____
If yes, DHEC Person Contacted: _____
Final Results:

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# Chapter 31 – Resources

A wide variety of resources are available to assist you in expanding your knowledge of Child Nutrition Programs, nutrition and nutrition education. This chapter will explain how to obtain materials for training yourself or your staff, assistance with remodeling and designing a new school kitchen, ideas for nutrition education activities in the classroom and cafeteria, materials to use for a nutrition fair, steps for establishing or maintaining a healthy school environment and much more.

## Important Agencies and Organizations

### **National Food Service Management Institute**

The National Food Service Management Institute (NFSMI) was authorized by Congress in 1989 and was permanently authorized in 1994. It is organized into four divisions: Administration, Education and Training, Information Services, and Applied Research. They conduct research, design training programs and take that training to schools nationwide through seminars and workshops, satellite presentations, teleconferences, participation at professional meetings and conferences, and via the NFSMI web site. Trainers are available upon request but many of their classes and videos can be downloaded from their web site, free of charge. Resources and information is available from:

National Food Service Management Institute  
The University of Mississippi  
P.O. Drawer 188  
University, MS 38677-0188  
Phone: (800) 321-3054  
Fax: (800) 321-3061  
E-mail: [nfsmi@olemiss.edu](mailto:nfsmi@olemiss.edu)  
[www.nfsmi.org](http://www.nfsmi.org)

### **Office of Nutrition Programs**

The Office of Nutrition Programs at the South Carolina Department of Education (SCDE) works in cooperation with USDA's Food and Nutrition Service (FNS) to administer the Child Nutrition Programs and Commodities Program in South Carolina schools. For additional information about the administration or management of these programs, contact:

Office of Nutrition Programs  
SC Department of Education  
1429 Senate Street  
Suite 700  
Columbia, SC 29201  
Phone: (803) 734-8187  
Fax: (803) 737-4148  
<http://ed.sc.gov/agency/os/Nutrition-Programs/>

### **School Nutrition Association**

The School Nutrition Association (SNA) is a professional organization for school nutrition employees, educators and administrators. They provide members with education and training, set standards through certification and credentialing, gather and transmit information related to school nutrition, and represent the nutritional interests of all children. Membership is optional and is available for a fee. Benefits of membership include a subscription to *School Nutrition* magazine, discounts on purchases from the Emporium and on insurance, access to research, marketing, training and promotional materials, the opportunity to attend conferences, the opportunity to become certified and credentialed and more. For additional information and services, contact:

School Nutrition Association  
700 South Washington Street  
Suite 300  
Alexandria, VA 22314  
Phone: (703) 739-3900  
Fax: (703) 739-3915  
E-mail: [servicecenter@schoolnutrition.org](mailto:servicecenter@schoolnutrition.org)  
[www.schoolnutrition.org](http://www.schoolnutrition.org)

**or**

School Nutrition Association of South Carolina  
P.O. Box 1795  
Columbia, SC 29202  
Phone: (803) 782-0951  
Fax: (803) 790-2723  
[www.schoolnutritionsc.org](http://www.schoolnutritionsc.org)

### **South Carolina Department of Health and Environmental Control**

The Division of Food Protection at the South Carolina Department of Health and Environmental Control (DHEC) is responsible for ensuring that all schools prepare, serve and store food safely following the procedures outlined in the current South Carolina Food Code. Current requirements are explained in a publication known as the "Retail Food Establishments Regulation 61-25" which is available online or in hard copy from:

SC Department of Health and Environmental Control  
Division of Food Protection  
Bureau of Environmental Health  
2600 Bull St.  
Columbia, SC 29201  
Phone: (803) 896-0640  
Fax: (803) 896-0645  
[www.scdhec.gov/health/envhlth/food\\_protection](http://www.scdhec.gov/health/envhlth/food_protection)

### **South Carolina Department of Social Services**

The South Carolina Department of Social Services (DSS) is responsible for administering food assistance programs such as the Supplemental Nutrition Assistance Program (SNAP) and Temporary Assistance for Needy Families (TANF) program. Students in households which qualify for these programs automatically qualify for free CNP benefits. To confirm a student's participation in one of these programs or for additional information, contact:

SC Department of Social Services  
1535 Confederate Ave. Extension (Street Address)  
OR  
P.O. Box 1520 (Mailing Address)  
Columbia, SC 29202  
Phone: (803) 898-7601 or 800-768-5700  
<https://dss.sc.gov>

### **Team Nutrition**

The Annual Reviews (AR) focuses on ensuring that school meals meet the *Dietary Guidelines for Americans* and Healthy Hunger-free Kids Act of 2010 as well as nutrient standards based on age/grade appropriate *Recommended Dietary Allowances* (RDA). Because of the AR, school children eat nutritious, well-balanced breakfasts and lunches. Team Nutrition is the technical assistance and nutrition education initiative of the Food and Nutrition Service (FNS) division at the U. S. Department of Agriculture (USDA) designed to assist schools in bringing their meals in line with the *Dietary Guidelines* and nutrient standards, teach children and their caregivers the importance of healthy eating and physical activity, and foster community support for these efforts. Resources, including free training materials, and additional information is available from:

USDA's Team Nutrition  
3101 Park Center Drive, Room 632  
Alexandria, VA 22302  
Phone: (703) 305-1624  
Fax: (703) 305-2549  
[www.fns.usda.gov/tn](http://www.fns.usda.gov/tn)

### **USDA Food and Nutrition Service**

The Food and Nutrition Service (FNS) division of the U. S. Department of Agriculture (USDA) is responsible for administering nutrition assistance programs such as the Women, Infants, and Children (WIC) Program, Child and Adult Care Food Program (CACFP), Commodities Programs (FDP) and School Meals which include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Special Milk Program (SMP) and others. They operate these programs through partnerships with cooperating state and local agencies. More information including regulations and training materials is available from:

USDA Food and Nutrition Service  
3101 Park Center Dr.  
Alexandria, VA 22302  
Phone: (703) 305-2062  
[www.fns.usda.gov](http://www.fns.usda.gov)

### Resources by Subject

#### Customer Service

Focus on the Customer

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Go for the Gold with Customer Service

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### Determining Eligibility and Verification

USDA's Eligibility Guidance for School Meals Manual

[www.fns.usda.gov/CND/Guidance/eligibility-guidance.pdf](http://www.fns.usda.gov/CND/Guidance/eligibility-guidance.pdf)

#### Food Distribution

Food Distribution Division (FDD)

[www.fns.usda.gov/fdd](http://www.fns.usda.gov/fdd) or (703) 305-2680

USDA Commodity Fact Sheets

[www.fns.usda.gov/fdd/schfacts/](http://www.fns.usda.gov/fdd/schfacts/)

#### Food Production

Basics at a Glance Poster

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Building Quality Meals: Standardized Recipes and Portion Control

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Culinary Techniques: Cooking with Flair CD-ROMs

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

First Day...Every Day: Basics for Food Service Assistants, Part I

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

First Day...Every Day: Basics for Food Service Assistants, Part II

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Quality: Making the Grade in Child Nutrition, Part I

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Quality: Making the Grade in Child Nutrition, Part II

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Service Assistant...you are important

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Healthy Cuisine for Kids Training

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Measuring Success with Standardized Recipes

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

### Food Safety

Center for Food Safety and Applied Nutrition (CFSAN)  
[www.cfsan.fda.gov](http://www.cfsan.fda.gov) or (888) 723-3366

Centers for Disease Control and Prevention (CDC)  
[www.cdc.gov](http://www.cdc.gov) or (800) CDC-INFO or (800) 232-4636

Choice Plus Food Safety Supplement  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Developing a School Food Safety Program Using the Process Approach  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Fight BAC!™ Keep Food Safe from Bacteria  
[www.fightbac.org](http://www.fightbac.org) or (202) 220-0651

Food Allergy and Anaphylaxis Network  
[www.foodallergy.org](http://www.foodallergy.org) or (800) 929-4040

Food and Drug Administration (FDA)  
[www.fda.gov](http://www.fda.gov) or (888) INFO-FDA or (888) 463-6332

Food Safety Information Center  
[www.foodsafety.nal.usda.gov](http://www.foodsafety.nal.usda.gov) or (301) 504-5515

Food Safety and Inspection Service (FSIS)  
[www.fsis.usda.gov](http://www.fsis.usda.gov) or (800) 233-3935

Food Safety Fact Sheets  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Safety for Summer Food Service Programs  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Safety Mini Posters (set of 14)  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Safety Standard Operating Procedures  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Gateway to Government Food Safety Information  
[www.foodsafety.gov](http://www.foodsafety.gov)

Health Inspections in Schools: Supporting Food Safety  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

National Coalition for Food-Safe Schools (NCFSS)  
[www.foodsafeschools.org](http://www.foodsafeschools.org)

National Food Safety Education Month®  
[www.foodsafety.gov/september](http://www.foodsafety.gov/september)

## Chapter 31 - Resources

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Serving It Safe: A Managers Tool Kit, Second edition  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Serving It Safe Instructor Guide, Second edition  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Serving It Safe Interactive CD-ROM, Second edition  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Serving It Safe Poster  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Thermy  
[www.fsis.usda.gov/thermy](http://www.fsis.usda.gov/thermy) or (402) 344-5000

### Healthy School Environment

Changing the Scene: Improving the School Nutrition Environment  
[www.fns.usda.gov/tn](http://www.fns.usda.gov/tn) or (703) 305-1624

Community Nutrition Action Kit  
<http://teamnutrition.usda.gov/Resources/cnak.html> or (703) 305-1624

Getting It Started and Keeping It Going  
<http://teamnutrition.usda.gov/Resources/gettingitstarted.html> or (703) 305-1624

Making It Happen! School Nutrition Success Stories  
<http://teamnutrition.usda.gov/Resources/makingithappen.html> or (703) 305-1624

Popular Team Nutrition Events Book  
<http://teamnutrition.usda.gov/Resources/popularevents.html> or (703) 305-1624

Team Up at Home: Team Nutrition Activity Booklet  
<http://teamnutrition.usda.gov/Resources/teamupbooklet.html> or (703) 305-1624

yourSELF Middle School Nutrition Education Kit  
<http://teamnutrition.usda.gov/Resources/yourself.html> or (703) 305-1624

### Kitchen Design

Food Service Equipment Guide  
<http://teamnutrition.usda.gov/Resources/equipmentguide.html> or (703) 305-1624

The New Design Handbook for School Food Service  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

United States Environmental Protection Agency (EPA)  
[www.epa.gov](http://www.epa.gov) or 1-800-241-1754

## Chapter 31 - Resources

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### **Marketing and Merchandising** (also see Nutrition and Nutrition Education)

#### Events Calendar

<http://teammnutrition.usda.gov/library.html> or (703) 305-1624

#### Fruits and Vegetables Galore: Helping Kids Eat More

[www.fns.usda.gov/tn/Resources/fv\\_galore.html](http://www.fns.usda.gov/tn/Resources/fv_galore.html)

#### Real-Time Marketing

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### School Breakfast: A Smart Way to Start the Day

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

### **Menu Planning**

#### Accommodating Children with Special Dietary Needs in School Nutrition Programs: Guidance for School Food Service Staff

[www.fns.usda.gov/cnd/guidance](http://www.fns.usda.gov/cnd/guidance)

#### Assisted NuMenus Guidance: School Lunch and Breakfast Menus

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### A Tool Kit for Healthy School Meals: Recipes and Training Materials\*

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### Building for the Future: Nutrition Guidance for the Child Nutrition Programs

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### Cooking a World of New Tastes

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

#### Food Guide Pyramid

[www.mypyramid.gov](http://www.mypyramid.gov) or (888) 7-PYRAMID

#### Healthy School Meals Resource System (HSMRS)

<http://schoolmeals.nal.usda.gov> or (301) 504-5719

#### National Nutrient Database for Standard Reference

[www.ars.usda.gov/nutrientdata](http://www.ars.usda.gov/nutrientdata) or (301) 504-0630

#### Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs

<http://teammnutrition.usda.gov/Resources/nutrientanalysis.html>

#### Offer versus Serve

[http://teammnutrition.usda.gov/Resources/offer\\_v\\_serve.html](http://teammnutrition.usda.gov/Resources/offer_v_serve.html)

#### Summer Food Service Program; 2009 Administrative Guidance for Sponsors

[www.fns.usda.gov/cnd/summer/library/handbooks.html](http://www.fns.usda.gov/cnd/summer/library/handbooks.html)

#### The Road to SMI Success - A Guide for School Foodservice Directors

<http://teammnutrition.usda.gov/Resources/roadtosuccess.html>

## Chapter 31 - Resources

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### USDA Recipes for Schools

[http://teammnutrition.usda.gov/Resources/usda\\_recipes.html](http://teammnutrition.usda.gov/Resources/usda_recipes.html)

[www.olemiss.edu/depts/nfsmi/Information/school\\_recipe\\_index\\_alpha.html](http://www.olemiss.edu/depts/nfsmi/Information/school_recipe_index_alpha.html)

\* Note that the recipes in this resource have not been updated to include critical control points or information from the latest version of *USDA's Food Buying Guide for Child Nutrition Programs*, both of which are required in all standardized recipes used in South Carolina schools.

### Nutrition and Nutrition Education

#### Agriculture in the Classroom

[www.agclassroom.org](http://www.agclassroom.org)

#### American Egg Board

[www.aeb.org](http://www.aeb.org) or (847) 296-7043

#### California Cling Peach Board

[www.calclingpeach.com](http://www.calclingpeach.com) or (510) 654-5400

#### California Dried Plums

[www.californiadriedplums.org](http://www.californiadriedplums.org) or (916) 565-6232

#### California Figs

[www.californiafigs.com](http://www.californiafigs.com) or (559) 440-5400

#### California Kiwifruit

[www.kiwifruit.org](http://www.kiwifruit.org) or (916) 441-0678

#### California Strawberry Commission

[www.calstrawberry.com](http://www.calstrawberry.com) or (831) 724-1301

#### California Tomato Commission

[www.tomato.org](http://www.tomato.org)

#### Canned Vegetable Council

[www.cannedveggies.org](http://www.cannedveggies.org)

#### Center for Disease Control Fruits and Veggies Matter

[www.fruitsandveggiesmatter.gov](http://www.fruitsandveggiesmatter.gov) or (800) 311-3435

#### Center for Nutrition Policy and Promotion

[www.cnpp.usda.gov](http://www.cnpp.usda.gov) or (703) 305-7600

#### Cherry Marketing Institute

[www.cherrymkt.org](http://www.cherrymkt.org) or (925) 838-5454

#### Dietary Guidelines for Americans

[www.health.gov/DietaryGuidelines](http://www.health.gov/DietaryGuidelines) or (240) 453-8280

[www.health.gov/dietaryguidelines/dga2000/document/frontcover](http://www.health.gov/dietaryguidelines/dga2000/document/frontcover)

#### Dole SuperKids

[www.dole5aday.com](http://www.dole5aday.com) or (800) 356-3111

## Chapter 31 - Resources

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Eat Smart. Play Hard. ™ (Power Panther™)

[www.fns.usda.gov/EATSMARTPLAYHARD/](http://www.fns.usda.gov/EATSMARTPLAYHARD/) or (703) 305-1624

<http://doe.sd.gov/oess/cans/nutrition/eatsmartplayhard.asp> or (605) 773-3413

[www.powerpanther.org](http://www.powerpanther.org) or (785) 296-2276

Food and Nutrition Information Center (FNIC)

[www.nal.usda.gov/fnic](http://www.nal.usda.gov/fnic) or (301) 504-5414

Food Guide Pyramid

[www.mypyramid.gov](http://www.mypyramid.gov)

Free Field Trips

[www.fieldtripfactory.com](http://www.fieldtripfactory.com) or (800) 987-6409

Government Healthfinder

[www.healthfinder.gov](http://www.healthfinder.gov) or (240) 453-8280

Idaho Potato Commission

[www.idahopotato.com](http://www.idahopotato.com) or (208) 334-2350

Kansas Wheat Commission

[www.kswheat.com](http://www.kswheat.com) or (866) 75-WHEAT

Michigan Apple Committee

[www.michiganapples.com](http://www.michiganapples.com) or (800) 456-2753

MyPyramid Resources

<http://teamnutrition.usda.gov/kids-pyramid.html>

<http://teamnutrition.usda.gov/library.html>

National Cattlemen's Beef Association

[www.beeffoodservice.com](http://www.beeffoodservice.com) or (303) 694-030

National Dairy Council

[www.nationaldairycouncil.org](http://www.nationaldairycouncil.org)

[www.southeastdairy.org](http://www.southeastdairy.org) or (770) 996-6085

North American Blueberry Council

[www.blueberrycouncil.org](http://www.blueberrycouncil.org) or (916) 983-0111

Nutrition.gov

[www.nutrition.gov](http://www.nutrition.gov) or (301) 504-5755

Nutrition 101: A Taste of Food and Fitness

[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Nutrition Decision

[www.nutritiondecision.org/](http://www.nutritiondecision.org/)

## Chapter 31 - Resources

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Produce for Better Health Foundation  
[www.pbhfoundation.org](http://www.pbhfoundation.org) or (302) 235-2329  
[www.shop5aday.com](http://www.shop5aday.com)

Science 4 Kids  
[www.ars.usda.gov/is/kids](http://www.ars.usda.gov/is/kids)

Team Nutrition  
[www.fns.usda.gov/tn](http://www.fns.usda.gov/tn) or (703) 305-1624

The American Dietetic Association  
[www.eatright.org](http://www.eatright.org) or (800) 877-1600

### **Purchasing**

Agricultural Marketing Service (AMS)  
[www.ams.usda.gov](http://www.ams.usda.gov) or (202) 720-8732

Choice Plus: A Reference Guide for Foods and Ingredients  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

First Choice: A Purchasing Systems Manual for School Food Service  
[www.nfsmi.org](http://www.nfsmi.org) or (800) 321-3054

Food Buying Guide  
<http://teammnutrition.usda.gov/resources/foodbuyingguide.html> or (703) 305-1624

Food Service Equipment Guide  
<http://teammnutrition.usda.gov/Resources/equipmentguide.html> or (703) 305-1624

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# Chapter 32 - History

## Child Nutrition Goals

The goals of Child Nutrition Programs (CNPs) as they have developed over the years are to:

- Serve nutritionally adequate, appealing and moderately priced meals.
- Help children grow socially and emotionally.
- Extend educational influences to the homes of school children.
- Improve children's food habits with the ultimate goal of developing healthy adults.

## The Early Days

CNPs have a long history. School meals were offered in the U.S. as far back as the 1890s; some European countries were operating programs a hundred years before.

At around the turn of the 20<sup>th</sup> century, school meals were being provided in cities such as Philadelphia, Boston, New York, Cleveland, Cincinnati and Milwaukee. Civic and social organizations or volunteers provided the meals. In most cases, the lunch programs were self-supporting. Some students paid three cents for their meals.

The depression of the 1930s brought widespread unemployment. Millions of people lost their jobs and were without means of support for themselves and their families. Demand and prices for farm products steadily declined. Millions of children were unable to pay for their school lunches; and with limited resources to provide meals at home, malnutrition among children became a national concern.

Public Law 320 passed in 1935 encouraged domestic consumption of surplus commodities by donating them to needy families and school lunch programs. The commodity distribution program grew rapidly.

The Works Progress Administration (W. P.A.) was also created in 1935. This agency provided work for the unemployed in public works projects. Since there were unemployed, needy women in nearly every city, town and rural community in the country, these women were assigned to prepare and serve school lunches. By 1941 W.P.A. school lunch programs were operating in all states, the District of Columbia and Puerto Rico.

The 78<sup>th</sup> Congress set aside federal funds for the first time in 1943 to provide cash subsidy payments for the purchase of food for school lunch programs. Similar legislation was passed by Congress in subsequent years.

### National School Lunch Act

In 1946 Congress recognized the need for a more permanent status for the school lunch program and authorized the necessary appropriations for it. The legislation was identified as the “National School Lunch Act” and stated:

“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 an adequate supply of food and other facilities for the establishment, maintenance, operation and expansion of nonprofit school lunch programs.”

Schools had to agree to provide meals that met minimum nutritional requirements prescribed by the U.S. Secretary of Agriculture. These lunches were defined as one of three types: Type A, Type B, or Type C.

- The Type A lunch was defined as consisting of:
  - ½ pint fluid whole milk
  - Protein rich food consisting of one of the following or a combination:
    - 2 ounces of lean meat, fish or poultry
    - 2 ounces of cheese
    - 1 egg
    - ½ cup of cooked dry beans or peas
    - 4 Tablespoons of peanut butter
  - ¾ cup serving of two or more vegetables or fruits, or both
  - 1 serving of bread, rolls, muffins, etc.
  - 2 teaspoons of butter or fortified margarine

The Type A meal pattern lasted 35 years (1946-1977) with only minor changes.

- Type B lunches contained smaller quantities of the components in the Type A lunch and were served primarily in schools with inadequate cooking facilities.
- Type C lunches consisted of only ½ pint of fluid whole milk served as a beverage.

### Child Nutrition Act of 1966

The Child Nutrition Act of 1966 established guidelines for determining who should qualify to receive a reduced-price or free meal. This law established Income Eligibility Guidelines that are based on the federal poverty levels. The income guidelines are revised annually and are still used today as the basis of approving households for reduced-price or free benefits.

This act also established the first substantial funding for needy children’s meals; and identified the U. S. Department of Agriculture as the agency assigned to administer all school food service funds and establish uniform standards.

The Child Nutrition Act continued the Type C lunch, which became known as the “Special Milk Program”. It also provided for a pilot breakfast program, funds to purchase school food service equipment in low-income areas and state administrative funds.

### Child Nutrition Programs – 1966 to Today

The 1980s brought changes and challenges to CNPs. The decade was characterized by declines in funding, stricter federal regulations, and more reviews of CNP operations by state and federal agencies. During the 1980s, the requirement for verification of eligibility was established.

Participation in the National School Lunch Program (NSLP) reached a peak in 1979 with an average of 27 million lunches served per day. In 1982 nearly 3000 schools dropped out of the NSLP as a result of budget cuts. This decline in schools participating in the program continued until 1989. Participation has increased only slightly since.

During the 1980s and 1990s, the threat of block grants increased. With block grants the federal money would be given to the state, and the state would decide how the money would be distributed. School food service professionals feared CNPs would lose if block grants were to become a reality.

In 1994 the “Healthy Meals for Americans Act” reinforced established nutrition standards for the NSLP and School Breakfast Programs. Regulations for the “School Meals Initiative” were finalized in 1995 and provided several different menu planning system options. These menu planning systems are described in more detail in Chapter 19 of this *Program Reference Manual*.

**South Carolina**  
**School Food Service Program Reference Manual**  
Contributor: Lorrie Gregory

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# Chapter 33 - Acronyms & Abbreviations

The acronyms and abbreviations listed in this chapter are used throughout the *Program Reference Manual* and are terms commonly used in the administration of Child Nutrition Programs.

<b>ADA</b>	-	Americans with Disabilities Act
<b>ADP</b>	-	Average Daily Participation
<b>APP</b>	-	Alternate Protein Product
<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>CN</b>	-	Child Nutrition
<b>CNP</b>	-	Child Nutrition Program
<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>FB</b>	-	Food-Based
<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>FMNV</b>	-	Foods of Minimal Nutritional Value
<b>FNS</b>	-	(USDA) Food and Nutrition Service
<b>FSIS</b>	-	Food Safety and Inspection Service
<b>FSMC</b>	-	Food Service Management Company

## Chapter 33 – Acronyms and Abbreviations

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<b>G/B</b>	-	Grain/Bread
<b>GED</b>	-	General Educational Development
<b>HACCP</b>	-	Hazard Analysis and Critical Control Point
<b>HHFKA</b>	-	Health Hunger-Free Kids Act 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>LWP</b>	-	Local Wellness Policy
<b>M/MA</b>	-	Meat/Meat Alternate
<b>NAC</b>	-	Nutrition Advisory Council
<b>NHANES</b>	-	National Health and Nutrition Examination Survey
<b>NNDCNP</b>	-	National Nutrient Database for Child Nutrition Programs
<b>NFSMI</b>	-	National Food Service Management Institute
<b>NSLA</b>	-	National School Lunch Act
<b>NSLP</b>	-	National School Lunch Program
<b>NSMP</b>	-	Nutrient Standard Menu Planning
<b>OVS</b>	-	Offer versus Serve
<b>PIN</b>	-	Personal Identification Number
<b>PLE</b>	-	Paid Lunch Equity
<b>PR</b>	-	Production Record
<b>PS</b>	-	Performance Standards
<b>PTA</b>	-	Parent Teacher Association
<b>PTO</b>	-	Parent Teacher Organization

## Chapter 33 – Acronyms and Abbreviations

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<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>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>SMP</b>	-	Special Milk Program
<b>SNA</b>	-	School Nutrition Association
<b>SNACS</b>	-	School Nutrition Automated Claim System
<b>SNAP</b>	-	Supplemental Nutrition Assistance Program
<b>SNASC</b>	-	School Nutrition Association of South Carolina
<b>SNB</b>	-	Severe Need Breakfast
<b>SSO</b>	-	Seamless Summer Option
<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