south dakota
DEPARTMENT OF EDUCATION
Learning. Leadership. Service.

FOOD SERVICE DIRECTOR/MANAGER HANDBOOK

CHILD AND ADULT NUTRITION SERVICES

CANS WEBPAGE: https://doe.sd.gov/cans/index.aspx

iCAN – Online application/claim system: https://ican.sd.gov/ICAN/Splash.aspx

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CANS Calendar

This list includes a timeline important CANS-related activities, events, and due dates for the typical school year in South Dakota. Exact dates may slightly fluctuate from year to year. Please note – This calendar may contain information for programs which your agency may not participate in.

Annual

- ☐ Civil Rights training for all staff involved with any Child Nutrition Program or Food Distribution (NSLP, SBP, SMP, CACFP, SFSP, SSO, FFVP, TEFAP, CSFP)
- ☐ Complete Child and Adult Care Food Program (CACFP) training for all staff that have duties in the CACFP.
- ☐ Complete SNP Professional Standard training requirements for school nutrition personnel. Don't forget your cooks, cashiers, determining official(s), meal count & claim staff, and support staff that impact food safety.
- ☐ School Nutrition Program (SNP) annual evaluation of your Local Wellness Policy.
- ☐ Update your SNP Food Safety SOP's (HACCP) plan.
- ☐ SNP complete the Nonprogram Food Revenue tool to ensure revenue from sales of nonprogram foods is sufficient to cover nonprogram food costs.

Every Month

- ☐ Check the CANS Nutrition Bulletin to stay up to date on upcoming trainings and program requirements!
- ☐ Check your iMATCH system for directly certified (for free meals) student matches-check daily or weekly for more student matches!
- ☐ USDA Foods (formerly commodities) orders available starting July for delivery September through May. Orders are placed through iCAN.
- ☐ TEFAP USDA foods order blanks are emailed approximately 6 weeks prior to delivery, watch for monthly deadlines.
- ☐ TEFAP agencies submit bill of lading (if applicable) and inventory for current month's order.
- ☐ 10– Monthly claims for reimbursement due for each prior month of operation through iCAN.
- ☐ 20 to 25 – State DOE processes reimbursement payments.

July

- ☐ USDA Foods iCAN ordering opens for September delivery.
- ☐ SNP iCAN application - due date for year-long (12-month) programs to receive timely reimbursement.
- ☐ TEFAP September food order, upcoming program year annual information/renewal forms
- ☐ SNA SD Annual State Conference

August

- ☐ Child and Adult Care Food Program (CACFP) open late August/early September in iCAN.
- ☐ SNP iCAN application-last chance due date for traditional school year (9-month) programs to receive timely claim reimbursement.
- ☐ iMATCH Training Webinar
- ☐ TEFAP Audit Requirement due for program year

- ☐ Annual Financial Statements due

September

- ☐ SNP 30 operating day carry over reminder: update benefit issuance/eligibility roster with your 30th operating day of school. Change all students without a new application to paid status. That will be in October for some schools.
- ☐ AfterSchool Snack On-Site Monitoring-complete 1st monitoring review within the 1st 4-weeks of operation. Check CANS Memos for form.
- ☐ Child and Adult Care Food Program (CACFP) open late August/early September in iCAN.
- ☐ Fresh Fruit and Vegetable Program (FFVP) Webinar Training

October

- ☐ Verification of School Meal Applications: Count approved F&RP meal applications to determine pool to verify per CANS NSLP verification memo.
- ☐ iCAN applications due.
- ☐ National School Lunch Week (https://schoolnutrition.org/)
- ☐ SNP equipment grant application (if available) posted to CANS website.
- ☐ SNP look up total directly certified students in iMATCH system to report on Verification report.
    - o Remember to include extended eligibility.
- ☐ SNP count students with F&RP eligibility to report on iCAN Verification 742 report.

November

- ☐ Equipment assistance grant applications (if available) due to CANS
- ☐ SNP verification of applications process must be complete and report due in iCAN by November 15
- ☐ SNP independent review of applications report (742A) due. Schools are notified individually by CANS if required.

December

- ☐ Enjoy your holiday break!!!

January

- ☐ SNP complete one on-site monitoring annual review of meal counting procedures before Feb 1 if your district/agency has more than 1 feeding site.
- ☐ Equipment assistance grants (if available) to qualifying SFAs announced.
- ☐ Agencies choosing to use a Food Service Management Company (FSMC) next school year contact CANS for policies, guidance, and prototype Requests for Proposal contract.
- ☐ USDA Foods school year survey for the upcoming year.

February

- ☐ Afterschool Snack On-Site Monitoring-complete second monitoring.
- ☐ CACFP training needs assessments emailed.
- ☐ Summer Food Service Program (SFSP) and SNP Seamless Summer Option sponsor information for summer available. Schedule posted for SFSP application packet opening in iCAN.
- ☐ SFSP and SNP SSO training registration deadline.

March

- ☐ SFSP USDA Foods (formerly commodities) orders due.
- ☐ CACFP spring workshops announced.
- ☐ FFVP request for application for new participants available.
- ☐ National School Breakfast Week (https://schoolnutrition.org/)
- ☐ Summer Food Service Program (SFSP) required administrative workshops for new sponsors
- ☐ SNP SSO training.
- ☐ Audit statements due now or 9 months from end of fiscal year.

April

- ☐ SNP application opens in iCAN for upcoming school year.
- ☐ SNP complete paid lunch equity (PLE) tool to set student paid lunch prices for upcoming school year.
- ☐ SNP report student enrollment by site and number of directly certified students by site for Community Eligibility Provision report due by end of April. You can report early through iCAN.
- ☐ FFVP applications made available in iCAN.
- ☐ SFSP applications due in iCAN. Check with CANS for specific due date.
- ☐ SFSP operational workshop

May

- ☐ CACFP training workshops held around the state.
- ☐ SFSP preapproval visits for new sponsors.
- ☐ SNP SSO sponsors complete required program on-site monitoring.
- ☐ SFSP training of site staff and preoperational monitoring form (if applicable); complete and upload to iCAN prior to starting meal service.

June

- ☐ FFVP application approvals (between May and July); budgeting award provided.
- ☐ SFSP site monitoring completed as planned in approved agreement.
- ☐ CACFP training workshops held around the state.
- ☐ SNP applications due in iCAN for SSO/Extended School Year service.

Meal Patterns Cover

Breakfast/Lunch Meal Pattern:

Can be found here: http://doe.sd.gov/cans/documents/dietarysp.pdf

CACFP Meal Pattern for Preschoolers:

Can be found here: file:///C:/Users/depr12977c/Desktop/FSD%203/3B%20CACFP%20MealPatternsforPreschoolers.pdf

Short/Long Week Meal Patterns:

Can be found here: https://doe.sd.gov/cans/documents/ShortLong.pdf

	Breakfast Meal Pattern			Lunch Meal Pattern		
	Grades K-5[a]	*Grades 6-8*[a]	*Grades 9-12*[a]	*Grades K-5*	*Grades 6-8*	*Grades 9-12*
Meal Pattern	**Amount of Food**[b] **Per Week (Minimum Per Day)**					
Fruits (cups)[c,d]	5 (1) [e]	5 (1) [e]	5 (1) [e]	2½ (½)	2½ (½)	5 (1)
Vegetables (cups)[c,d]	0	0	0	3¾ (¾)	3¾ (¾)	5 (1)
Dark green [f]	0	0	0	½	½	½
Red/Orange [f]	0	0	0	¾	¾	1¼
Beans/Peas (Legumes) [f]	0	0	0	½	½	½
Starchy[f]	0	0	0	½	½	½
Other [f,g]	0	0	0	½	½	¾
Additional Veg to Reach Total[h]	0	0	0	1	1	1½
Grains (oz eq) [i]	7-10 (1) [j]	8-10 (1) [j]	9-10 (1) [j]	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alternates (oz eq)	0 [k]	0 [k]	0 [k]	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups) [l]	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week						
Min-max calories (kcal)[m,n,o]	350-500	400-550	450-600	550-650	600-700	750-850
Saturated fat (% of total calories)[n,o]	< 10	< 10	< 10	< 10	< 10	< 10
Sodium (mg)[n, p]	< 430	< 470	< 500	< 640	< 710	< 740
Trans fat[n,o]	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.					

[a]In the SBP, the above age-grade groups are required beginning July 1, 2013 (SY 2013-14). In SY 2012-2013 only, schools may continue to use the meal pattern for grades K-12 (see § 220.23).

[b] Food items included in each food group and subgroup and amount equivalents. Minimum creditable serving is ⅛ cup.

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

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

[e]The fruit quantity requirement for the SBP (5 cups/week and a minimum of 1 cup/day) is effective July 1, 2014 (SY 2014-2015).

[f]Larger amounts of these vegetables may be served.

[g] This category consists of "Other vegetables" as defined in §210.10(c)(2)(iii)(E). For the purposes of the NSLP, "Other vegetables" requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups as defined in §210.10(c)(2)(iii).

[h]Any vegetable subgroup may be offered to meet the total weekly vegetable requirement.

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

[j]In the SBP, the grain ranges must be offered beginning July 1, 2013 (SY 2013-2014).

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

[l]Fluid milk must be low-fat (1 percent milk fat or less, unflavored) or fat-free (unflavored or flavored).

[m]The average daily amount of calories for a 5-day school week must be within the range (at least the minimum and no more than the maximum values).

[n]Discretionary sources of calories (solid fats and added sugars) may be added to the meal pattern if within the specifications for calories, saturated fat, trans fat, and sodium. Foods of minimal nutritional value and fluid milk with fat content greater than 1 percent milk fat are not allowed.

[o]In the SBP, calories and trans fat specifications take effect beginning July 1, 2013 (SY 2013-2014).

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

Breakfast/Lunch Meal Pattern

Can be found here: http://doe.sd.gov/cans/documents/dietarysp.pdf

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

	Breakfast Meal Pattern			Lunch Meal Pattern		
	Grades K-5[a]	Grades 6-8[a]	Grades 9-12[a]	Grades K-5	Grades 6-8	Grades 9-12
Meal Pattern	Amount of Food[b] Per Week (Minimum Per Day)					
Fruits (cups)[c,d]	5 (1)[e]	5 (1)[e]	5 (1)[e]	2½ (½)	2½ (½)	5 (1)
Vegetables (cups)[c,d]	0	0	0	3¾ (¾)	3¾ (¾)	5 (1)
Dark green[f]	0	0	0	½	½	½
Red/Orange[f]	0	0	0	¾	¾	1¼
Beans/Peas (Legumes)[f]	0	0	0	½	½	½
Starchy[f]	0	0	0	½	½	½
Other[f,g]	0	0	0	½	½	¾
Additional Veg to Reach Total[h]	0	0	0	1	1	1½
Grains (oz eq)[i]	7-10 (1)[j]	8-10 (1)[j]	9-10 (1)[j]	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alternates (oz eq)	0[k]	0[k]	0[k]	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups)[l]	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week						
Min-max calories (kcal)[m,n,o]	350-500	400-550	450-600	550-650	600-700	750-850
Saturated fat (% of total calories)[n,o]	< 10	< 10	< 10	< 10	< 10	< 10
Sodium (mg)[n, p]	≤ 430	≤ 470	≤ 500	≤ 640	≤ 710	≤ 740
Trans fat[n,o]	Nutrition label or manufacturer specifications must indicate zero grams of trans fat per serving.					

[a] In the SBP, the above age-grade groups are required beginning July 1, 2013 (SY 2013-14). In SY 2012-2013 only, schools may continue to use the meal pattern for grades K-12 (see § 220.23).

[b] Food items included in each food group and subgroup and amount equivalents. Minimum creditable serving is ⅛ cup.

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

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

[e] The fruit quantity requirement for the SBP (5 cups/week and a minimum of 1 cup/day) is effective July 1, 2014 (SY 2014-2015).

CHILD MEAL PATTERN

Breakfast (Select all three components for a reimbursable meal)				
Food Components and Food Items[1]	**Ages 1-2**	**Ages 3-5**	**Ages 6-12**	**Ages 13-18**[2] (at-risk afterschool programs and emergency shelters)
Fluid Milk[3]	4 fluid ounces	6 fluid ounces	8 fluid ounces	8 fluid ounces
Vegetables, fruits, or portions of both[4]	¼ cup	½ cup	½ cup	½ cup
Grains (oz eq)[5,6,7]				
Whole grain-rich or enriched bread	½ slice	½ slice	1 slice	1 slice
Whole grain-rich or enriched bread product, such as biscuit, roll or muffin	½ serving	½ serving	1 serving	1 serving
Whole grain-rich, enriched or fortified cooked breakfast cereal[8], cereal grain, and/or pasta	¼ cup	¼ cup	½ cup	½ cup
Whole grain-rich, enriched or fortified ready-to-eat breakfast cereal (dry, cold)[8,9]				
Flakes or rounds	½ cup	½ cup	1 cup	1 cup
Puffed cereal	¾ cup	¾ cup	1 ¼ cup	1 ¼ cup
Granola	⅛ cup	⅛ cup	¼ cup	¼ cup

[1] Must serve all three components for a reimbursable meal. Offer versus serve is an option for at-risk afterschool participants.

[2] Larger portion sizes than specified may need to be served to children 13 through 18 years old to meet their nutritional needs.

[3] Must be unflavored whole milk for children age one. Must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk for children two through five years old. Must be unflavored low-fat (1 percent), unflavored fat-free (skim), or flavored fat-free (skim) milk for children six years old and older.

[4] Pasteurized full-strength juice may only be used to meet the vegetable or fruit requirement at one meal, including snack, per day.

[5] At least one serving per day, across all eating occasions, must be whole grain-rich. Grain-based desserts do not count towards meeting the grains requirement.

[6] Meat and meat alternates may be used to meet the entire grains requirement a maximum of three times a week. One ounce of meat and meat alternates is equal to one ounce equivalent of grains.

[7] Beginning October 1, 2019, ounce equivalents are used to determine the quantity of creditable grains.

[8] Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose and other sugars per 100 grams of dry cereal).

[9] Beginning October 1, 2019, the minimum serving size specified in this section for ready-to-eat breakfast cereals must be served. Until October 1, 2019, the minimum serving size for any type of ready-to-eat breakfast cereals is ¼ cup for children ages 1-2; 1/3 cup for children ages 3-5; and ¾ cup for children ages 6-12.

CHILD MEAL PATTERN

Lunch and Supper (Select all five components for a reimbursable meal)				
Food Components and Food Items[1]	**Ages 1-2**	**Ages 3-5**	**Ages 6-12**	**Ages 13-18**[2] (at-risk afterschool programs and emergency shelters)
Fluid Milk[3]	4 fluid ounces	6 fluid ounces	8 fluid ounces	8 fluid ounces
Meat/meat alternates				
Lean meat, poultry, or fish	1 ounce	1 ½ ounce	2 ounces	2 ounces
Tofu, soy product, or alternate protein products[4]	1 ounce	1 ½ ounce	2 ounces	2 ounces
Cheese	1 ounce	1 ½ ounce	2 ounces	2 ounces
Large egg	½	¾	1	1
Cooked dry beans or peas	¼ cup	⅜ cup	½ cup	½ cup
Peanut butter or soy nut butter or other nut or seed butters	2 tbsp	3 tbsp	4 tbsp	4 tbsp
Yogurt, plain or flavored unsweetened or sweetened[5]	4 ounces or ½ cup	6 ounces or ¾ cup	8 ounces or 1 cup	8 ounces or 1 cup
The following may be used to meet no more than 50% of the requirement: Peanuts, soy nuts, tree nuts, or seeds, as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternates (1 ounces of nuts/seeds = 1 ounce of cooked lean meat, poultry, or fish)	½ ounce = 50%	¾ ounce = 50%	1 ounce = 50%	1 ounce = 50%
Vegetables[6]	⅛ cup	¼ cup	½ cup	½ cup
Fruits[6,7]	⅛ cup	¼ cup	¼ cup	¼ cup
Grains (oz eq)[8,9]				
Whole grain-rich or enriched bread	½ slice	½ slice	1 slice	1 slice
Whole grain-rich or enriched bread product, such as biscuit, roll or muffin	½ serving	½ serving	1 serving	1 serving
Whole grain-rich, enriched or fortified cooked breakfast cereal[10], cereal grain, and/or pasta	¼ cup	¼ cup	½ cup	½ cup

[1] Must serve all five components for a reimbursable meal. Offer versus serve is an option for at-risk afterschool participants.

[2] Larger portion sizes than specified may need to be served to children 13 through 18 years old to meet their nutritional needs.
[3] Must be unflavored whole milk for children age one. Must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk for children two through five years old. Must be unflavored low-fat (1 percent), unflavored fat-free (skim), or flavored fat-free (skim) milk for children six years old and older.
[4] Alternate protein products must meet the requirements in Appendix A to Part 226.
[5] Yogurt must contain no more than 23 grams of total sugars per 6 ounces.
[6] Pasteurized full-strength juice may only be used to meet the vegetable or fruit requirement at one meal, including snack, per day.
[7] A vegetable may be used to meet the entire fruit requirement. When two vegetables are served at lunch or supper, two different kinds of vegetables must be served.
[8] At least one serving per day, across all eating occasions, must be whole grain-rich. Grain-based desserts do not count towards the grains requirement.
[9] Beginning October 1, 2019, ounce equivalents are used to determine the quantity of the creditable grain.
[10] Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose and other sugars per 100 grams of dry cereal).

CHILD MEAL PATTERN

Snack (Select two of the five components for a reimbursable snack)				
Food Components and Food Items[1]	**Ages 1-2**	**Ages 3-5**	**Ages 6-12**	**Ages 13-18**[2] (at-risk afterschool programs and emergency shelters)
Fluid Milk[3]	4 fluid ounces	4 fluid ounces	8 fluid ounces	8 fluid ounces
Meat/meat alternates				
Lean meat, poultry, or fish	½ ounce	½ ounce	1 ounce	1 ounce
Tofu, soy product, or alternate protein products[4]	½ ounce	½ ounce	1 ounce	1 ounce
Cheese	½ ounce	½ ounce	1 ounce	1 ounce
Large egg	½	½	½	½
Cooked dry beans or peas	⅛ cup	⅛ cup	¼ cup	¼ cup
Peanut butter or soy nut butter or other nut or seed butters	1 tbsp	1 tbsp	2 tbsp	2 tbsp
Yogurt, plain or flavored unsweetened or sweetened[5]	2 ounces or ¼ cup	2 ounces or ¼ cup	4 ounces or ½ cup	4 ounces or ½ cup
Peanuts, soy nuts, tree nuts, or seeds	½ ounce	½ ounce	1 ounce	1 ounce
Vegetables[6]	½ cup	½ cup	¾ cup	¾ cup
Fruits[6]	½ cup	½ cup	¾ cup	¾ cup
Grains (oz eq)[7,8]				
Whole grain-rich or enriched bread	½ slice	½ slice	1 slice	1 slice
Whole grain-rich or enriched bread product, such as biscuit, roll or muffin	½ serving	½ serving	1 serving	1 serving
Whole grain-rich, enriched or fortified cooked breakfast cereal[9], cereal grain, and/or pasta	¼ cup	¼ cup	½ cup	½ cup
Whole grain-rich, enriched or fortified ready-to-eat breakfast cereal (dry, cold)[9,10]				
Flakes or rounds	½ cup	½ cup	1 cup	1 cup
Puffed cereal	¾ cup	¾ cup	1 ¼ cup	1 ¼ cup
Granola	⅛ cup	⅛ cup	¼ cup	¼ cup

[1] Select two of the five components for a reimbursable snack. Only one of the two components may be a beverage.

[2] Larger portion sizes than specified may need to be served to children 13 through 18 years old to meet their nutritional needs.

[3] Must be unflavored whole milk for children age one. Must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk for children two through five years old. Must be unflavored low-fat (1 percent), unflavored fat-free (skim), or flavored fat-free (skim) milk for children six years old and older.

[4] Alternate protein products must meet the requirements in Appendix A to Part 226.

[5] Yogurt must contain no more than 23 grams of total sugars per 6 ounces.
[6] Pasteurized full-strength juice may only be used to meet the vegetable or fruit requirement at one meal, including snack, per day.
[7] At least one serving per day, across all eating occasions, must be whole grain-rich. Grain-based desserts do not count towards meeting the grains requirement.
[8] Beginning October 1, 2019, ounce equivalents are used to determine the quantity of creditable grains.
[9] Breakfast cereals must contain no more than 6 grams of sugar per dry ounce (no more than 21.2 grams sucrose and other sugars per 100 grams of dry cereal).
[10] Beginning October 1, 2019, the minimum serving sizes specified in this section for ready-to-eat breakfast cereals must be served. Until October 1, 2019, the minimum serving size for any type of ready-to-eat breakfast cereals is ¼ cup for children ages 1-2; 1/3 cup for children ages 3-5; and ¾ cup for children ages 6-12.

CACFP Meal Pattern For Preschoolers

Can be found here:
file:///C:/Users/depr12977c/Desktop/FSD%203/3B%20CACFP%20MealPatternsforPreschoolers.pdf

USDA United States Department of Agriculture

CHILD MEAL PATTERN

Breakfast (Select all three components for a reimbursable meal)				
Food Components and Food Items[1]	**Ages 1-2**	**Ages 3-5**	**Ages 6-12**	**Ages 13-18**[2] (at-risk afterschool programs and emergency shelters)
Fluid Milk[3]	4 fluid ounces	6 fluid ounces	8 fluid ounces	8 fluid ounces
Vegetables, fruits, or portions of both[4]	¼ cup	½ cup	½ cup	½ cup
Grains (oz eq)[5,6,7]				
Whole grain-rich or enriched bread	½ slice	½ slice	1 slice	1 slice
Whole grain-rich or enriched bread product, such as biscuit, roll or muffin	½ serving	½ serving	1 serving	1 serving
Whole grain-rich, enriched or fortified cooked breakfast cereal[8], cereal grain, and/or pasta	¼ cup	¼ cup	½ cup	½ cup
Whole grain-rich, enriched or fortified ready-to-eat breakfast cereal (dry, cold)[8,9]				
Flakes or rounds	½ cup	½ cup	1 cup	1 cup
Puffed cereal	¾ cup	¾ cup	1 ¼ cup	1 ¼ cup
Granola	⅛ cup	⅛ cup	¼ cup	¼ cup

[1] Must serve all three components for a reimbursable meal. Offer versus serve is an option for at-risk afterschool participants.

[2] Larger portion sizes than specified may need to be served to children 13 through 18 years old to meet their nutritional needs.

[3] Must be unflavored whole milk for children age one. Must be unflavored low-fat (1 percent) or unflavored fat-free (skim) milk for children two through five years old. Must be unflavored low-fat (1 percent), unflavored fat-free (skim), or flavored fat-free (skim) milk for children six years old and older.

Short/Long Week Meal Patterns

Can be found here: https://doe.sd.gov/cans/documents/ShortLong.pdf

Short and Long Week Calculations (rounded to nearest 0.5 oz eq and 0.25 cup)

Final meal pattern requirements from memo SP10-2012

*Applies to schools who regularly operate on a shorter or longer weekly cycle

*Since the dietary specifications are based on a average daily amounts, these are unaffected by varying week lengths (average over length of week, whether consisting of 3 to 7 days)

**Due to size of weekly vegetable subgroup requirements, the 20% adjustment is not practical. Therefore, adjustments are primarily made to the "Additional Vegetable" category only- which in turn allows increased or decreased offering amounts of any of the subgroups to meet this requirement.

Three Day School Week Meal Component Adjustments

3-day School Week-Breakfast	Grades K-8 Weekly (daily)	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)	Grades K-12 Weekly (daily)
Fruits (cups)	3 (1)	3 (1)	3 (1)	3 (1)	3 (1)
Grains (oz eq)	5-6 (1)	4-6 (1)	5-6 (1)	5.5-6 (1)	5.5-6 (1)
Fluid Milk (cups)	3 (1)	3 (1)	3 (1)	3 (1)	3 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

3-day School Week-Lunch	Grades K-8 Weekly (daily)	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)
Fruits (cups)	1.5 (0.5)	1.5 (0.5)	1.5 (0.5)	3 (1)
Vegetables (cups)	2.25 (0.75)	2.25 (0.75)	2.25 (0.75)	3 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.5	0.5	0.5	1
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.25	0.25	0.25	0.5
Additional Veg to Reach Total	0	0	0	0
Grains (oz eq)	5- 5.5 (1)	5- 5.5 (1)	5-6 (1)	6-7 (2)
Meats/Meat Alts (oz eq)	5.5-6 (1)	5-6 (1)	5.5-6 (1)	6-7 (2)
Fluid Milk (cups)	3 (1)	3 (1)	3 (1)	3 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

Short and Long Week Calculations (rounded to nearest 0.5 oz eq and 0.25 cup)

Final meal pattern requirements from memo SP10-2012

*Applies to schools who regularly operate on a shorter or longer weekly cycle

*Since the dietary specifications are based on a average daily amounts, these are unaffected by varying week lengths (average over length of week, whether consisting of 3 to 7 days)

**Due to size of weekly vegetable subgroup requirements, the 20% adjustment is not practical. Therefore, adjustments are primarily made to the "Additional Vegetable" category only- which in turn allows increased or decreased offering amounts of any of the subgroups to meet this requirement.

Three Day School Week Meal Component Adjustments

3-day School Week-Breakfast	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	3 (1)	3 (1)	3 (1)	3 (1)	3 (1)
Grains (oz eq)	5-6 (1)	4-6 (1)	5-6 (1)	5.5-6 (1)	5.5-6 (1)
Fluid Milk (cups)	3 (1)	3 (1)	3 (1)	3 (1)	3 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

3-day School Week-Lunch	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	1.5 (0.5)	1.5 (0.5)	1.5 (0.5)	3 (1)
Vegetables (cups)	2.25 (0.75)	2.25 (0.75)	2.25 (0.75)	3 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.5	0.5	0.5	1
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.25	0.25	0.25	0.5
Additional Veg to Reach Total	0	0	0	0
Grains (oz eq)	5- 5.5 (1)	5- 5.5 (1)	5-6 (1)	6-7 (2)
Meats/Meat Alts (oz eq)	5.5-6 (1)	5-6 (1)	5.5-6 (1)	6-7 (2)
Fluid Milk (cups)	3 (1)	3 (1)	3 (1)	3 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

Four Day School Week Meal Component Adjustments

4-day School Week-Breakfast	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	4 (1)	4 (1)	4 (1)	4 (1)	4 (1)
Grains (oz eq)	6.5-8 (1)	5.5-8 (1)	6.5-8 (1)	7-8 (1)	7-8 (1)
Fluid Milk (cups)	4 (1)	4 (1)	4 (1)	4 (1)	4 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

4-day School Week-Lunch	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	2 (0.5)	2 (0.5)	2 (0.5)	4 (1)
Vegetables (cups)	3 (0.75)	3 (0.75)	3 (0.75)	4 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.75	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.5	0.5	0.5	0.75
Additional Veg to Reach Total	0.25	0.25	0.25	0.5
Grains (oz eq)	6.5-7 (1)	6.5-7 (1)	6.5-8 (1)	8-9.5 (2)
Meats/Meat Alts (oz eq)	7-8 (1)	6.5-8 (1)	7-8 (1)	8-9.5 (2)
Fluid Milk (cups)	4 (1)	4 (1)	4 (1)	4 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

Five Day School Week Meal Component Adjustments

5-day School Week-Breakfast	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Grains (oz eq)	8-10 (1)	7-10 (1)	8-10 (1)	9-10 (1)	9-10 (1)
Fluid Milk (cups)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

5-day School Week-Lunch	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	2.5 (0.5)	2.5 (0.5)	2.5 (0.5)	5 (1)
Vegetables (cups)	3.75 (0.75)	3.75 (0.75)	3.75 (0.75)	5 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.75	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.5	0.5	0.5	0.75
Additional Veg to Reach Total	1	1	1	1.5
Grains (oz eq)	8-9 (1)	8-9 (1)	8-10 (1)	10-12 (2)
Meats/Meat Alts (oz eq)	9-10 (1)	8-10 (1)	9-10 (1)	10-12 (2)
Fluid Milk (cups)	5 (1)	5 (1)	5 (1)	5 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

Six Day School Week Meal Component Adjustments

6-day School Week-Breakfast	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	6 (1)	6 (1)	6 (1)	6 (1)	6 (1)
Grains (oz eq)	9.5-12 (1)	8.5-12 (1)	9.5-12 (1)	11-12 (1)	11-12 (1)
Fluid Milk (cups)	6 (1)	6 (1)	6 (1)	6 (1)	6 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

6-day School Week-Lunch	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	3 (0.5)	3 (0.5)	3 (0.5)	6 (1)
Vegetables (cups)	4.5 (0.75)	4.5 (0.75)	4.5 (0.75)	6 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.75	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.5	0.5	0.5	0.75
Additional Veg to Reach Total	1.75	1.75	1.75	2.5
Grains (oz eq)	9.5-11 (1)	9.5-11 (1)	9.5-12 (1)	12-14.5 (2)
Meats/Meat Alts (oz eq)	11-12 (1)	9.5-12 (1)	11-12 (1)	12-14.5 (2)
Fluid Milk (cups)	6 (1)	6 (1)	6 (1)	6 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

Seven Day School Week Meal Component Adjustments

7-day School Week-Breakfast	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12	Grades K-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	7 (1)	7 (1)	7 (1)	7 (1)	7 (1)
Grains (oz eq)	11-14 (1)	10-14 (1)	11-14 (1)	12.5-14 (1)	12.5-14 (1)
Fluid Milk (cups)	7 (1)	7 (1)	7 (1)	7 (1)	7 (1)
Min-max Calories, daily avg	400-500	350-500	400-550	450-600	450-500

7-day School Week-Lunch	Grades K-8	Grades K-5	Grades 6-8	Grades 9-12
	Weekly (daily)	Weekly (daily)	Weekly (daily)	Weekly (daily)
Fruits (cups)	3.5 (0.5)	3.5 (0.5)	3.5 (0.5)	7 (1)
Vegetables (cups)	5.25 (0.75)	5.25 (0.75)	5.25 (0.75)	7 (1)
Dark Green	0.5	0.5	0.5	0.5
Red/Orange	0.75	0.75	0.75	1.25
Beans/Peas (Legumes)	0.5	0.5	0.5	0.5
Starchy	0.5	0.5	0.5	0.5
Other	0.5	0.5	0.5	0.75
Additional Veg to Reach Total	2.5	2.5	2.5	3.5
Grains (oz eq)	11-12.5 (1)	11-12.5 (1)	11-14 (1)	14-17 (2)
Meats/Meat Alts (oz eq)	12.5-14 (1)	11-14 (1)	12.5-14 (1)	14-17 (2)
Fluid Milk (cups)	7 (1)	7 (1)	7 (1)	7 (1)
Min-max Calories, daily avg	600-650	550-650	600-700	750-850

7/10/13

Whole Grain Rich Cover

Whole Grain resources

Can be found here: http://doe.sd.gov/cans/documents/GrainChrt.pdf

Grains/Bread Chart

Can be found here: https://doe.sd.gov/cans/documents/Bread

United States Department of Agriculture

Whole Grain Resource for the National School Lunch and School Breakfast Programs

A Guide to Meeting the Whole Grain-Rich Criteria

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Introduction

This resource outlines the whole grain-rich criteria for school meals. It contains information to help program operators identify foods that meet the whole grain-rich criteria and offer them in their menus. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) has created this resource to reflect the *2010 Dietary Guidelines for Americans* (DGAs), which recommend that children and adults consume at least half of their grains as whole grains. Questions and answers on selecting and serving grain products for school meal programs are available in FNS Memo SP 10-2012: Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"(http://www.fns.usda.gov/cnd/governance/Policy-Memos/2012/SP10-2012av7.pdf). Please note that the term "whole grain-rich" refers to FNS criteria for school meal requirements for grain. This term is not permitted for product labels because it is an implied health claim about the fiber content regulated by the United States Food and Drug Administration (FDA) and would be in violation of the standards for "rich in fiber."

Grain Requirements for School Meals

Ounce equivalent standards for the National School Lunch and School Breakfast Programs (NSLP/SBP)

All grain products served in NSLP/SBP must be credited based on per-ounce equivalent (oz eq) standards. This applies to various products as follows:

- Baked goods (breads, biscuits, bagels, etc.): 16 grams of creditable grain ingredients provide 1 oz eq credit.
- Cereal grains (oatmeal, pasta, brown rice, etc.): 28 grams (approximately 1.0 ounce by weight) of dry product OR ½ cup cooked cereal, pasta, rice, etc. provides 1 oz eq credit.
- Ready-to-eat (RTE) breakfast cereal: 28 grams OR 1.0 ounce of product provides 1 oz eq credit. Ounce equivalent volumes are 1 cup flakes or rounds, 1.25 cups puffed cereal, and ¼ cup granola.

Other USDA child nutrition programs may continue to use previous crediting standards for grains unless new meal requirements are developed.

What foods meet the whole grain-rich criteria?

Foods that meet the whole grain-rich criteria for the school meal programs contain 100 percent whole grain or a blend of whole-grain meal and/or flour and enriched meal and/or flour of which at least 50 percent is whole grain. The remaining 50 percent or less of grains, if any, must be enriched.

Schools can use the following elements to evaluate if a grain product meets the whole grain-rich criteria:

Element 1: The food item must meet the ounce equivalent (oz eq) requirements for the grains component as defined in SP 30-2012 (http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2012/SP30_2012os.pdf) and the revised Exhibit A for School Meal Programs (Attachment D of this document).

AND

Element 2: The food must meet at least one of the following requirements:

a. Whole grains per oz eq are at least 8.0 grams or more for Groups A – G of Exhibit A. For Groups H and I, the volumes or weights listed must be offered to credit as 1 oz eq, and whole grains must be the primary grains (with other grains being enriched). This information may be obtained from the product packaging or from the manufacturer, if available.

b. The product includes one of the following U.S. Food and Drug Administration (FDA)-approved whole grain health claims on its packaging:

> *"Diets rich in whole grain foods and other plant foods, and low in total fat, saturated fat, and cholesterol, may reduce the risk of heart disease and certain cancers."*
>
> OR
>
> *"Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease."*

c. The product ingredient declaration lists a whole grain first, specifically:

I. Nonmixed dishes (e.g., breads, cereals): Whole grains are the primary ingredient by weight (a whole grain is first on the ingredient list with an exception for water). Products in which whole grain content comes from multiple ingredients can meet the whole grain-rich criteria when all whole grains combined are the primary ingredient by weight. Proper documentation from the manufacturer or a standardized recipe is required.

II. Mixed dishes (e.g., pizza, corn dogs): Whole grains are the primary *grain* ingredient by weight (a whole grain is the first grain ingredient in the list of grains). For recipes, the weights of grain ingredients are used to

continued on next page

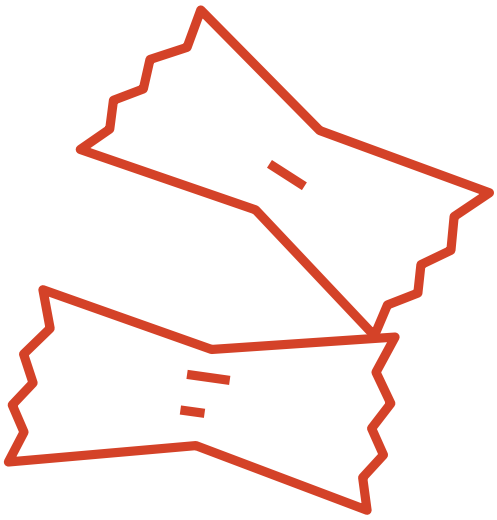
Grains Requirements for School Meals (continued)

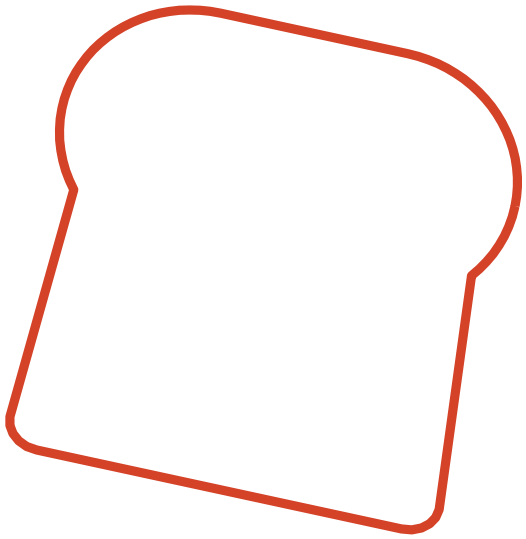
determine whether the total weight of whole grains is greater than or equal to the total weight of grains that are not whole grain. Proper documentation from the manufacturer or a standardized recipe is required.

Some products include flour blends listed in the ingredient declaration, for example, *Ingredients: Flour blend (whole-wheat flour, enriched flour), sugar, cinnamon, etc.* When trying to determine if whole grain is the primary ingredient by weight for these products, program operators will need to know either that the whole-grain content is at least 8.0 grams per oz eq or that the weight of the whole grain is greater than the first ingredient listed after the flour blend (such as sugar in the example, as well as the enriched flour). Bran and germ ingredients are not creditable in school meal programs. Noncreditable grain ingredients in products at levels less than 2 percent are allowable, but not credited (See page 7 for more information).

Ready-to-Eat (RTE) breakfast cereals must list a whole grain as the primary ingredient **and** the cereal must be fortified. RTE cereals that are made from 100 percent whole grains are not required to be fortified. If the product includes enriched ingredients, or if the product itself is enriched, the ingredients or the product must meet the Food and Drug Administration's standards of identify for enrichment (21 CFR Section 137).

Manufacturers producing qualifying products (meat/meat alternate entrées containing grains) may apply for a Child Nutrition (CN) Label to indicate the number of oz eq grains that meet the whole grain-rich criteria. The term "oz eq grains" on the CN Label indicates that the product meets the whole grain-rich criteria, while the terms "bread" or "bread alternate" on the CN Label indicate that the product meets previous program requirements for grains/breads.

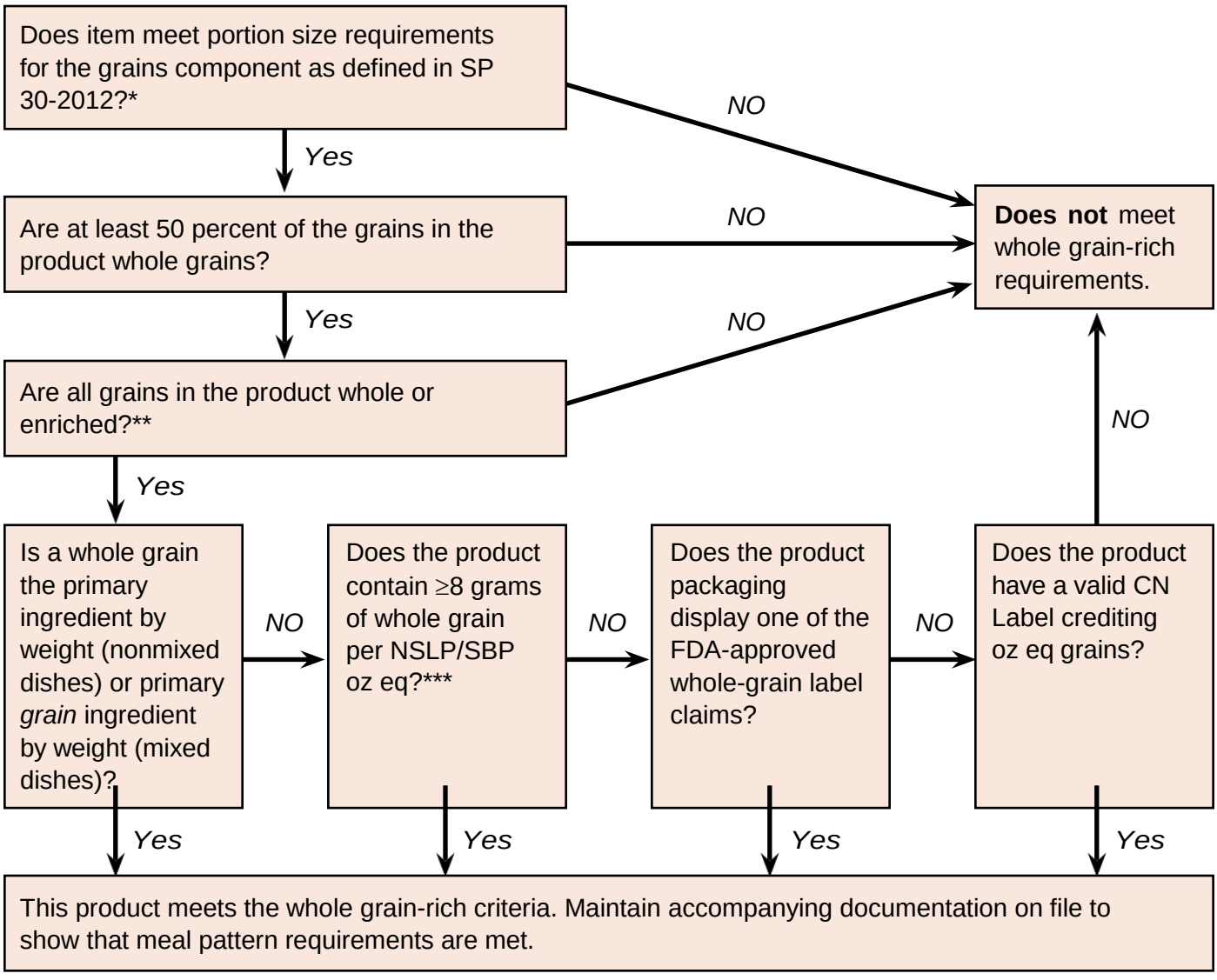




How Do I Know if a Product Meets Whole Grain-Rich Criteria?

There are many foods labeled as whole grain, such as pizza crusts, buns, breads, tortillas, and other products. The chart below will assist you in determining if your whole-grain product meets the criteria.

Does My Product Meet the Whole Grain-Rich Criteria?



*Must contain at least 0.25 ounce equivalent grains in order to credit toward meal pattern requirements.

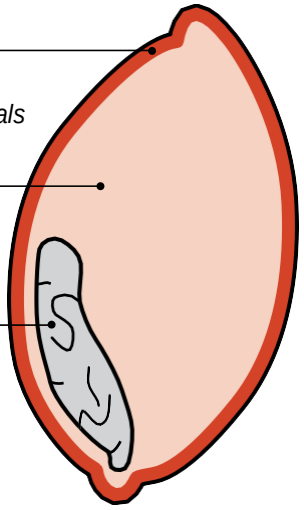
**Noncreditable grains should be limited to no more than 0.24 oz eq (3.99 grams for Groups A-G of the Revised Exhibit A or 6.99 grams for Groups H or I). See page 7 for more information.

***Applies to groups A-G of the revised Exhibit A only. Groups H and I require 28 grams of creditable grain per oz eq of which at least 14 grams are whole to meet the 50 percent whole grain-rich criteria.

What Is a Whole Grain?

Whole grains consist of the entire cereal grain seed or kernel. The kernel has three parts—the bran, the germ, and the endosperm. Usually the kernel is cracked, crushed, or flaked during the milling process. If the finished product retains the same relative proportions of bran, germ, and endosperm as the original grain, it is considered a whole grain.

Whole Grain Kernel



When you see the following words, you will know that by the U.S. Food and Drug Administration (FDA) Standards of Identity, they describe whole grains that are used as ingredients:

- Cracked wheat
- Crushed wheat
- Whole-wheat flour
- Graham flour
- Entire-wheat flour
- Bromated whole-wheat flour
- Whole durum wheat flour

Common and usual names for other whole grains are noted below:

- The word *whole* listed before a grain, for example, *whole* wheat
- The words *berries* and *groats* are also used to designate whole grains, for example, wheat *berries* or oat *groats*
- Rolled oats and oatmeal (including old-fashioned, quick-cooking, and instant oatmeal)
- Reconstituted whole wheat can be considered whole grain when the reconstitution is done by the original milling facility to ensure the same batch of whole grain is returned to natural proportions. Request documentation from the milling company to state that they recombined the grain components to natural proportions of bran, germ, and endosperm.
- Other whole-grain products that do not use the word "whole" in their description, for example, brown rice, brown rice flour, wild rice, quinoa, millet, triticale, teff, amaranth, buckwheat, or sorghum.

A more comprehensive overview of whole grains can be located on the following FDA website: http://www.fda.gov/ForConsumers/ConsumerUpdates/ucm151902.htm.

Grain ingredients that should not be considered whole grains (please contact your State agency to determine if a questionable grain ingredient is creditable):

flour	phosphated flour	hominy grits
white flour	self-rising flour	hominy
wheat flour	self-rising wheat flour	farina
all-purpose flour	enriched self-rising flour	semolina
unbleached flour	bread flour	degerminated corn meal
bromated flour	cake flour	enriched rice
enriched bromated flour	durum flour	rice flour
enriched flour	corn grits	couscous
instantized flour		

Grain products that often do not meet the whole grain-rich criteria:

- "Pot" or "Scotch" barley and "pearl" or "pearled" barley are ***not*** whole grain because bran has been removed. Look for the words whole barley or whole grain barley on the product label or in the ingredient statement. However, the FDA has recognized that "dehulled barley" is a whole grain.
- "Stone ground" does not necessarily mean that the product is whole grain. "Stone ground" describes the process used for making the flour or meal. Look for "whole" in combination with "stone ground" in the ingredient statement.
- Whole corn "treated with lime" (often used in tortilla chips, taco shells and tamales, and may be called "masa"). These items must bear one of the FDA whole-grain health claims on product packaging in order to meet the whole grain-rich criteria (see page 3 for complete health claims). Manufacturers may also provide documentation showing that their product meets the requirements for this claim to demonstrate that the whole grain-rich criteria are met. Please see FNS Memo SP 02-2013 (http://www.fns.usda.gov/cnd/Governance/Policy-Memos/2013/SP02-2013os.pdf) for complete guidance on selecting products made from corn masa. Please refer to the FDA Modernization Act for the full requirements of health claims related to whole-grain foods (page 31).
- When a grain name, such as wheat, rice, or rye flour is listed in the ingredient statement, but has no descriptor (such as "whole-grain" for wheat or "brown" for rice), the program operator needs to obtain further documentation from the manufacturer before purchasing the food product to ensure it meets the whole grain-rich criteria.

Noncreditable grains:

There are some grain ingredients such as oat fiber, corn fiber, bran, germ, modified food starch, corn starch, and wheat starch (including potato, legume, and other vegetable flours) that do not contribute toward meal pattern components. If purchased grain products include these ingredients they must be present at a level of less than 2 percent of the product formula (or less than 0.25 oz eq) for the product to be creditable at lunch or breakfast beginning SY 2013-2014.

Incorporating Products That Meet Whole Grain-Rich Criteria

Purchasing

Before purchasing new products containing whole grains, look carefully at the whole product. When soliciting bids from manufacturers, specify that products must be made from 50 percent or more whole grains with all remaining grains being enriched. Prior to purchasing, double check the ingredient statement and any accompanying manufacturer documentation to ensure that the product meets whole grain-rich criteria. In addition, to be consistent with the *2010 Dietary Guidelines for Americans* (DGAs), program operators are encouraged to purchase and serve grain items that meet the whole grain-rich criteria that are also low in sugars and/or fat.

Storing Whole Grains

As with all foods, use FIFO (First In, First Out) principles when storing whole-grain items. Because whole-grain ingredients (e.g., whole-wheat flour, brown rice) retain the bran and the oil-rich germ, these items may turn rancid when stored in warm areas and have a shorter shelf life than their refined counterparts. To increase shelf life, store these products in a cool, dry place in airtight containers. If products will not be used within a short period of time, they should be stored in the refrigerator or freezer.

Introducing Foods That Meet Whole Grain-Rich Criteria

Some students may not be familiar with foods that meet the whole grain-rich criteria. To encourage them to try different products, conduct student taste tests to select items that have the most student appeal. By documenting the taste tests and student preferences, program operators may develop a list of appealing products for purchase that meet the whole grain-rich criteria.

Serving items that meet the whole grain-rich criteria in versions that are popular with students also increases acceptability. Introduce whole grains in student favorites, such as pizza or spaghetti. Increase the number of offerings that meet the whole grain-rich criteria from the 50 percent that is required beginning SY 2012-2013 to all grain offerings meeting the whole grain-rich criteria as required by SY 2014-2015.

The goal is to offer nutritious items that meet the whole grain-rich criteria and that students will enjoy. If students prefer to select grain options that are lighter in color, you may choose to incorporate products or recipes that use white whole-wheat flour to increase acceptance. Including a dessert on a limited basis (2 oz eq per week at lunch) as an element of a reimbursable meal can also have the positive effect of increasing acceptance and encouraging children to more fully participate in the meal service.

Ideas for Adding Products That Meet Whole Grain-Rich Criteria to Menus

Consider the menu suggestions below to add grains items that are acceptable to children in versions that meet the whole grain-rich criteria:

- Ready-to-eat cereals
- Cooked breakfast cereals*
- Granola
- Granola bars or cereal bars
- Pancakes* or waffles
- Bagels or muffins
- Breads, rolls, or buns
- Tortillas,* taco shells
- Pretzels
- Pita pockets
- Cornbread
- Crackers
- Side dishes (e.g., brown rice,* wild rice, cracked wheat, whole-grain bulgur or barley, whole specialty grains)
- Pasta, such as macaroni,* spaghetti,* vermicelli, or other whole-grain noodles
- Salads (cracked wheat, whole-grain bulgur, whole specialty grains)
- Other uses of whole grains (soups, casseroles, combination dishes)
- Soba noodles (with whole buckwheat flour as primary ingredient)

*Currently available through USDA Foods.

Determining if Products Meet Whole Grain-Rich Requirements

Examples and Acceptable Documentation

This section can help program operators determine if grain items meet the whole grain-rich criteria for school meals. It includes sample products, an explanation of how to determine if the products meet whole grain-rich criteria, and the type of documentation needed to ensure that reimbursable meal pattern requirements are met. Program operators should check with their State agency prior to purchasing new grain products if they are unsure the item will meet requirements, or if they have questions on what type of documentation is needed for documenting meal pattern compliance.

Acceptable Forms of Documentation for Items That Meet Whole Grain-Rich Criteria

In order to document that the grain items served meet whole grain-rich criteria, program operators should maintain one or more of the following types of documentation on file:

- An ingredient declaration from a product carton that shows a whole grain as the primary ingredient by weight.*
- A copy of a food label showing the amount of whole grain in grams for the appropriate NSLP/SBP serving size or copy of a food label displaying one of the FDA whole-grain health claims.*
- USDA-Authorized CN Labels for entree items that include grains.
- A customized product formulation statement on manufacturer letterhead.* Sample product formulation templates for grain products can be seen on page 25 of this document and accessed through the CN Labeling website at: http://www.fns.usda.gov/cnd/cnlabeling/food-manufacturersindustry.
- A recipe that includes the ingredients and ingredient amounts by weight and volume.
- USDA Foods Fact Sheet (applicable for USDA Foods indicated as meeting the whole grain-rich criteria. Please note that fact sheets must be accompanied by acceptable manufacturer documentation if it is not clear that the item meets whole grain-rich criteria).

***Program operators may need additional information when using these items to document meal pattern compliance. Compare manufacturer documentation with ingredient statement and verify that crediting calculations on documentation are accurate.**

All Natural Whole-Wheat Pasta

Nutrition Facts

Serving Size 2 oz

Amount Per Serving	
Calories 200	Calories from Fat 15
	% Daily Value*
Total Fat 1.5g	**2**%
Saturated Fat 0g	**0**%
Trans Fat 0g	
Cholesterol 0mg	**0**%
Sodium 10mg	**0**%
Total Carbohydrate 41g	**14**%
Dietary Fiber 6g	**24**%
Sugars 2g	
Proteins 7g	
Vitamin A	0%
Vitamin C	0%
Calcium	0%
Iron	10%

Not a significant source of Cholesterol, Vitamin A, Vitamin C

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

Ingredients:
Whole grain wheat flour, wheat flour, oat fiber.

This product ingredient statement lists a whole grain as the primary ingredient by weight (whole grain wheat flour). However, it also contains unenriched wheat flour, oat fiber, and the pasta itself is not enriched.

Many pastas contain a blend of whole-wheat flour and unenriched flour. Products containing more than 0.24 ounce equivalents of noncreditable grains may not contribute toward the reimbursable meal. The program operator should request a product formulation statement to ensure the grams of noncreditable grain do not exceed a 0.24 ounce equivalency (6.99 grams for items in Group H of Exhibit A) prior to purchasing. If the product contains more than the allowable amount of noncreditable grains, it is not creditable toward meal pattern requirements.

Whole-Grain Chicken Corn Dog

Nutrition Facts

Serving Size 4 oz (112g)
Servings Per Case: 72

Amount Per Serving	
Calories 240	Calories from Fat 70
	% Daily Value*
Total Fat 8g	**12**%
Saturated Fat 2g	**10**%
Trans Fat 0g	
Cholesterol 20mg	**7**%
Sodium 590mg	**25**%
Total Carbohydrate 33g	**11**%
Dietary Fiber 5g	**20**%
Sugars 9g	
Proteins 9g	**18**%
Calcium	15%
Iron	15%

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

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

Batter Ingredients:
Water, whole wheat flour, whole grain corn, vegetable oil, sugar, contains 2% or less of leavening (sodium acid pyrophosphate, sodium bicarbonate), salt, ascorbic acid, egg white, dried honey, aritificial flavor.

Chicken Frank Ingredients:
Mechanically separated chicken,water, corn syrup solids, contains less than 2% of spices, salt, sodium phosphate, potassium chloride, flavorings, sodium diacetate, sodium erythorbate, sodium nitrite. Contains: Wheat

Corn dogs are mixed dishes as they contribute to both the grain and meat/meat alternate components. This corn dog lists a whole grain as the primary grain ingredient (first ingredient listed) in the batter and all other grains are whole, so the product meets whole grain-rich requirements. Maintain a copy of the label or product formulation statement on file to show that whole grain-rich criteria for reimbursable meals are being met.

White Whole-Wheat Breadsticks

Nutrition Facts

Serving Size: 2 Breadsticks (48g)

Amount Per Serving	
Calories 130	Calories from Fat 15
	% Daily Value*
Total Fat 1.5g	**2%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 280mg	**12%**
Total Carbohydrate 24g	**8%**
Dietary Fiber 3g	**12%**
Sugars 4g	
Proteins 5g	

Vitamin A	0%	•	Vitamin C	0%
Calcium	0%	•	Iron	8%
Ash	0%	•	Folate	6%
Niacin	10%	•	Riboflavin	4%
Thiamin	10%	•		

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

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

Calories per gram:

Fat 9 Total Carbohydrate 4 Protein 4

Ingredients for U.S. Market:
Whole wheat flour, water, enriched unbleached wheat flour (wheat flour, malted barley flour, niacin, iron as ferrous sulfate, thiamine mononitrite, enzyme, riboflavin, folic acid), yeast, sugar, wheat gluten. Contains less that 2% of the following: soybean oil, salt, oat fiber, honey, sodium stearoyl lactylate, datem, acesulfame potassium, ascorbic acid, enzyme. May contain milk, soy, egg and sesame.

The ingredient statement for this product lists a whole grain first (whole-wheat flour). Additionally, the remaining grain in the product is enriched, so this product meets the whole grain-rich criteria. Because there is only one noncreditable grain (oat fiber) and it is listed as being 2 percent or less of the product formula, there is no need to request additional information from the manufacturer. Maintain a copy of the label on file for documenting that this product meets whole grain-rich requirements.

Whole-Grain Cereal Bar

Nutrition Facts

Serving Size 1 bar (28g)

Amount Per Serving	
Calories 105	Calories from Fat 30
	% Daily Value*
Total Fat 3g	**5**%
Saturated Fat 1g	**6**%
Trans Fat 0g	
Cholesterol 0mg	**0**%
Sodium 75mg	**3**%
Total Carbohydrate 17g	**6**%
Dietary Fiber 1g	**4**%
Sugars 7g	
Proteins 1g	
Calcium	8%
Iron	2%

Not a significant source of Cholesterol, Vitamin A, Vitamin C

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

Ingredients:
Whole grain rolled oats, brown sugar, crisp brown rice, whole grain rolled wheat, soybean oil, whole wheat flour, almonds, water, freeze dried bananas, whole corn flour, sodium bicarbonate, malted barley extract, soy lecithin, natural flavor, caramel color, alpha tocopherol acetate, BHT.

This cereal bar contains a whole grain as the first ingredient (whole-grain oats), and all other grains (crisp brown rice, whole-grain rolled wheat, whole-wheat flour, and whole corn flour) listed are also whole. Maintain a copy of the product label on file.

Reduced Carb Wheat Tortilla

Nutrition Facts

Serving Size: 1 Tortillia (102g)
Servings Per Package: 12

Amount Per Serving	
Calories 280	Calories from Fat 70
	% Daily Value*
Total Fat 7g	**11**%
Saturated Fat 3.5g	**18**%
Trans Fat 0g	
Cholesterol 0mg	**0**%
Sodium 880mg	**37**%
Total Carbohydrate 43g	**14**%
Dietary Fiber 30g	**120**%
Sugars 0g	
Proteins 12g	

Vitamin A	0%	• Vitamin C	0%
Calcium	20%	• Iron	6%

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

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

Calories per gram:
Fat 9 Carbohydrate 4 Protein 4

Ingredients:
Water, modified food starch, whole-wheat flour, wheat gluten, powdered cellulose, hydrogenated soybean oil, caramel color, wheat protein isolate (wheat gluten, lactic acid, sulfite), sodium bicarbonate, contains 1% or less of salt, cellulose gum, cornstarch, distilled monoglycerides

This product is a nonmixed dish that does not list a whole grain as the primary ingredient by weight. Modified food starch is considered a noncreditable grain and should not be present in grain items at more than 2 percent of the product formula (or 0.24 oz eq). Therefore, this product will not meet whole grain-rich criteria.

Whole-Grain Cheese Pizza

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One 5.00 oz Wedge Cheese Pizza with Whole Wheat Crust provides 2.00 oz equivalent meat alternate, 1/8 cup red/orange vegetable, and 2.0 oz eq Grains for the Child Nutrition Meal Pattern Requirements. (Use of this logo and statement authorized by the Food and Nutrition Service, USDA XX-XX**.)

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Ingredients:
Crust (Flour blend [whole wheat flour, enriched wheat flour {bleached wheat flour, malted barley flour, niacin, reduced iron, thiamine mononitrate, riboflavin, folic acid}, water, soybean oil, dextrose, baking powder, yeast, salt, dough conditioners [wheat flour, salt, soy oil, ascorbic acid], wheat gluten). Shredded Mozzarella Cheese (Pasteurized part skim milk, cheese cultures, salt, enzymes). Shredded Mozzarella Cheese Substitute (Water, oil [soybean oil, partially hydrogenated soybean oil with citric acid], casein, milk protein concentrate, modified food starch, contains 2% or less of the following: sodium aluminum phosphate, salt, lactic acid, mozzarella cheese type flavor [cheese {milk, culture, rennet, salt}, milk solids, disodium phosphate], disodium phosphate, sorbic acid. Sauce (Water, tomato paste [not less than 28% NTSS], pizza seasoning [salt, sugar, spices, dehydrated onion, guar and xanthan gum, garlic powder, potassium sorbate, citric acid, tricalcium phosphate and soybean oil {prevent caking}], modified food starch). CONTAINS: WHEAT, MILK, AND SOY.

This pizza is CN-Labeled and credits "oz eq Grains" in the CN Label Statement. This means that the crust meets whole grain-rich criteria and the crediting on the CN Label can be used. Check to make sure that the CN number is valad on the CN Labeling website (www.fns.usda.gov/cnlabeling/authorized-manufacturers-and-labels) and maintain a copy of the product label on file.

Without the CN Label, the manufacturer would need to provide the weight of the crust per slice or the grams of creditable grain per slice, and the amount of unenriched wheat flour that is being used as a dough conditioner.

White Corn Tortillas

Nutrition Facts

Serving Size: 1 Tortillia (41g)
Servings Per Container: 8

Amount Per Serving	
Calories 90	Calories from Fat 10
	% Daily Value*
Total Fat 1g	**2%**
Saturated Fat 0g	**0%**
Trans Fat 0g	
Cholesterol 0mg	**0%**
Sodium 190mg	**8%**
Total Carbohydrate 14g	**5%**
Dietary Fiber 1g	**4%**
Sugars 0g	
Proteins 5g	

Vitamin A	0%	• Vitamin C	0%
Calcium	6%	• Iron	4%

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

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

Calories per gram:
Fat 9 Carbohydrate 4 Protein 4

Ingredients:
Whole corn treated with lime, water, cellulose gum, propionic acid (to preserve freshness), benzoic acid (to preserve freshness), phosphoric acid (preservative), dextrose, guar gum, amylase.

Corn masa (whole corn treated with lime) processed in the traditional manner using wet corn milling removes a significant amount of the corn pericarp and dissolves part of the corn kernel. Some of the whole-grain content is removed in the washing/rinsing of the corn during this process. If the product bears one of the FDA whole grain health claims on its packaging, it meets the whole grain-rich criteria (see page 7 for more information). Manufacturers may also provide documentation showing that their product meets the requirements for these claims to demonstrate that the whole grain-rich criteria are met. Without the FDA whole-grain health claim or acceptable manufacturer documentation, this product does not meet whole grain-rich criteria.

Enrichment of corn masa is not required for School Meal Programs when the finished corn product bears the FDA whole-grain health claim. If the corn product includes other grain ingredients, those ingredients should be whole or enriched. Noncreditable grains should be limited to less than 2 percent of product formula (or less than 0.24 oz eq grains).

Cornbread (School Recipe)

YIELD:	VOLUME:
50 Servings: 4 lb 14 oz (batter) 1 half-sheet pan	**50 Servings:** about 2 quarts 2 cups (batter) 50 pieces
100 Servings: 9 lb 12 oz (batter) 2 half-sheet pans	**100 Servings:** 1 gallon 1 quart (batter) 100 pieces

Ingredients	Weight	Measure
Flour, enriched bleached	1 lb	3 ¾ cups
Flour, whole-wheat	½ lb	2 cups
Cornmeal, whole-grain	1 lb	3 ¾ cups
Salt		1 ¼ tsp
Eggs, whole	5 ¼ oz	⅔ cup
Baking powder		2 Tbsp 2 tsp
Sugar	5 ¼ oz	¾ cup
Instant nonfat dry milk, reconstituted		3 ¾ cups
Vegetable oil		½ cup

Nutrients Per Serving

Calories	108	**Saturated Fat**	0.45 g	**Iron**	0.90 mg
Protein	2.65 g	**Cholesterol**	13 mg	**Calcium**	68 mg
Carbohydrate	18.03 g	**Vitamin A**	51 IU	**Sodium**	151 mg
Total Fat	2.82 g	**Vitamin C**	0.1 mg	**Dietary Fiber**	1.0 g

In this recipe, the whole-grain cornmeal, enriched flour, and whole-wheat flour each count as creditable grains. The weight of the whole grains exceeds the weight of the enriched flour, so this product meets the whole grain-rich criteria. Maintain the recipe on file to document that the product meets meal pattern requirements.

For commercial products that contain more than one whole grain with an enriched grain listed first in the ingredient statement, the manufacturer must provide a product formulation statement demonstrating that the whole grains exceed enriched grains. A sample product formulation statement is located on page 25.

Whole-Grain Ready-To-Eat Cereal

Nutrition Facts

Serving Size: 3/4 cup (29g)
Servings Per Container: about 9

Amount Per Serving	Cereal (dry)	Cereal with 1/2 cup skim milk
Calories	120	160
Calories from Fat	10	10
	% Daily Value**	
Total Fat 1g*	**2**%	**2**%
Saturated Fat 0g	**0**%	**0**%
Trans Fat 0g		
Cholesterol 0mg	**0**%	**0**%
Sodium 85mg	**4**%	**6**%
Total Carbohydrate 25g	**8**%	**10**%
Dietary Fiber 1g	**4**%	**4**%
Sugars 7g		
Proteins 2g		
Vitamin A	10%	15%
Vitamin C	10%	10%
Calcium	10%	25%
Iron	15%	15%
Vitamin D	10%	25%
Thiamin	15%	20%
Riboflavin	10%	25%
Niacin	15%	15%
Vitamin B6	15%	15%
Folic Acid	15%	15%
Vitamin B12	15%	25%

* Amount in Cereal (dry). Cereal with 1/2 cup skim milk contributes an additional 40 Calories, 0.5 g Total Fat, 55 mg Sodium, 6 g Total Carbohydrate (6 g Sugars), 4 g Protein.

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

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

Ingredients:
Whole grain wheat, sugar, brown rice flour, whole grain oats, honey, canola oil, maltodextrin, salt, corn syrup, cinnamon, barley malt syrup, barley malt extract, color added, soy lecithin, artificial flavor, baking soda, trisodium phosphate, vitamin E (mixed tocopherols) and BHT added to preserve freshness.

Vitamins and Minerals: Calcium Carbonate, Vitamin E acetate, a B vitamin (niacinamide), Vitamin C (sodium ascorbate), Iron (a mineral nutrient), Vitamin B6 (pyridoxine hydrochloride, Vitamin B2 (riboflavin), Vitamin B1 (thiamin mononitrate), Vitamin A (palmitate), Vitamin B12, Vitamin D3.

To meet the whole grain-rich criteria, ready-to-eat (RTE) breakfast cereals must list a whole grain first in the ingredient list and the cereal must be fortified. This cereal meets both requirements. Maintain a copy of the label on file. Cereals that are 100 percent whole grain (containing less than 6.99 grams of non-whole grain per NSLP/SBP ounce equivalency) do not need to be fortified to meet requirements.

USDA Foods

USDA United States Department of Agriculture
Food and Nutrition Service

USDA Foods Fact Sheet for Schools & Child Nutrition Institutions

(last updated, September 2013) **Visit us at** *www.fns.usda.gov/fdd*

100938 - TORTILLA, WHOLE WHEAT, FROZEN, 27 LB

CATEGORY	• Grains/Breads
PRODUCT DESCRIPTION	• These frozen 8 inch whole wheat tortillas are made of whole wheat flour or a combination of whole wheat flour and enriched wheat flour. The tortillas meet the HealthierUS School Challenge whole wheat criteria for a whole wheat food.
PACK/YIELD	• 12/24 ct pouches per 27 lb case. • One 27 lb case AP yields about 288 tortillas. • One pouch AP yields about 24 tortillas. • CN Crediting: 1 Whole wheat tortilla made with whole wheat flour provides 1.5 oz equivalent grains.
STORAGE	• Store frozen whole wheat tortillas at 0°F or below in original shipping case off the floor. • Use First-In-First-Out (FIFO) storage practices to ensure use of older product first.

Nutrition Information

Whole wheat tortilla, 8 inch

	1 tortilla (44 g)
Calories	120
Protein	4.0 g
Carbohydrate	20 g
Dietary Fiber	3 g
Sugars	1 g
Total Fat	2.5 g
Saturated Fat	0.5 g
Trans Fat	0 g
Cholesterol	0 mg
Iron	1 mg
Calcium	100 mg
Sodium	340 mg
Magnesium	0 mg
Potassium	0 mg
Vitamin A	0 IU
Vitamin A	0 RAE
Vitamin C	0 mg
Vitamin E	0 mg

Many products available to schools through the USDA Foods Program (formerly known as USDA commodities) do not include a label on product packaging. Obtain the USDA Foods code number from the manufacturer and visit the USDA Foods Available List for Schools and Institutions (http://www.fns.usda.gov/fdd/foods/healthy/Professional.htm) to access the product fact sheet. Check this site on a regular basis to stay abreast of changes in USDA Food offerings and maintain fact sheets on file to show that criteria are being met. Examples of current grain options available through USDA Foods that meet the whole grain-rich criteria include: whole-wheat tortillas, oatmeal, brown rice, whole-grain pastas (macaroni, rotini, and spaghetti), and whole-grain pancakes.

It may be necessary to contact the manufacturer for a product formulation statement if it is unclear whether the item meets whole grain-rich criteria. Sample product formulation statements for grain items can be accessed on page 25 of this document and through the CN Labeling website at: http://www.fns.usda.gov/sites/default/files/PFSgrains13-14.pdf.

Calculating Ounce Equivalencies

Program operators have the ability to credit ounce equivalencies for grain products based on the ounce weights listed in FNS Policy Memo SP 30-2012 and updated Exhibit A, or by the grams of creditable grain in each product portion (documented by standardized recipe or product formulation statement signed by a manufacturer). The following examples demonstrate how each method may be used to determine how qualifying products meet ounce equivalency requirements for grains in the National School Lunch and Breakfast programs.

Sample Product 1:

Whole-Grain Bread

- One slice weighs 0.9 oz
- Ingredient statement lists whole-wheat flour first. All other grains are enriched.
- Manufacturer documentation states that each slice contains 17 grams of creditable grain and no noncreditable grains

1. Calculating based on total weight of creditable product:

Because this product contains the required 16 grams of creditable grain per ounce equivalent for Groups A-G of the revised Exhibit A, we may credit it using the Exhibit A weight. The weight of the bread slice is divided by the standard weight listed for Group B products (see page 23).

Calculation: **0.9 oz ÷ 1.0 oz = 0.9 oz**

0.9 oz rounds down to **0.75 oz eq grains** per slice.

2. Calculating based on grams of creditable grain ingredient:

The same slice of bread may be credited using the amount of creditable grain. Manufacturers must provide documentation on company letterhead (or schools may retain a copy of their standardized recipe). Sample product formulation statements are provided starting on page 25.

For this calculation, divide the grams of creditable grain by the standard of 16 grams per oz equivalent.

Calculation: **17 g ÷ 16 g = 1.06**

1.6 rounds down to **1.0 oz eq grains** per slice.

continued on next page

Sample Product 2:

Whole-Grain Pasta

- One portion of dry pasta weighs 32 grams (including creditable grains and other ingredients).
- Ingredient statement lists whole-wheat flour first. All other grains are enriched.
- Manufacturer documentation states that each ½ cup (cooked) contains 29 grams of creditable grain.

1. Calculating based on Exhibit A volume:

Group H of Exhibit A states that ½ cup of cooked pasta (made from creditable ingredients) provides 1.0 ounce equivalent grains. Product label and manufacturer documentation should be maintained on file.

Calculation: **½ cup served ÷ ½ cup per oz eq = 1.0 oz eq grains**

2. Calculating based on dry weight:

For this calculation, the weight of the dry portion of pasta is divided by the weight listed for that product in the appropriate group of the revised Exhibit A.

Calculation: **32 g ÷ 28 g = 1.14**

1.14 rounds down to **1.0 oz eq grains** per portion of dry pasta.

3. Calculating based on grams of creditable grain ingredient per portion:

The same pasta may be credited using the percent of creditable grain. Manufacturers must provide documentation on company letterhead.

For this calculation, divide the grams of creditable grain by the standard of 28 grams per oz equivalent for Group H of Exhibit A.

Calculation: **29 g ÷ 28 g = 1.03**

1.3 rounds down to **1.0 oz eq grains** per ½ cup cooked pasta.

Exhibit A: School Lunch and Breakfast

Whole Grain-Rich Ounce Equivalency (Oz Eq) Requirements for School Meal Programs[1, 2]

GROUP A	OZ EQ FOR GROUP A
• Bread type coating • Bread sticks (hard) • Chow mein noodles • Savory crackers (saltines and snack crackers) • Croutons • Pretzels (hard) • Stuffing (dry) Note: Weights apply to bread in stuffing.	1 oz eq = 22 g or 0.8 oz 3/4 oz eq = 17 g or 0.6 oz 1/2 oz eq = 11 g or 0.4 oz 1/4 oz eq = 6 g or 0.2 oz
GROUP B	**OZ EQ FOR GROUP B**
• Bagels • Batter type coating • Biscuits • Breads (sliced whole wheat, French, Italian) • Buns (hamburger and hot dog) • Sweet crackers[4] (graham crackers - all shapes, animal crackers) • Egg roll skins • English muffins • Pita bread (whole wheat or whole grain-rich) • Pizza crust • Pretzels (soft) • Rolls (whole wheat or whole grain-rich) • Tortillas (whole wheat or whole corn) • Tortilla chips (whole wheat or whole corn) • Taco shells (whole wheat or whole corn)	1 oz eq = 28 g or 1.0 oz 3/4 oz eq = 21 g or 0.75 oz 1/2 oz eq = 14 g or 0.5 oz 1/4 oz eq = 7 g or 0.25 oz
GROUP C	**OZ EQ FOR GROUP C**
• Cookies[3] (plain - includes vanilla wafers) • Cornbread • Corn muffins • Croissants • Pancakes • Pie crust (dessert pies,[3] cobbler,[3] fruit turnovers,[4] and meat/meat alternate pies) • Waffles	1 oz eq = 34 g or 1.2 oz 3/4 oz eq = 26 g or 0.9 oz 1/2 oz eq = 17 g or 0.6 oz 1/4 oz eq = 9 g or 0.3 oz

[1] 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.

[2] 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.

[3] Allowed only as dessert at lunch as specified in §210.10.

[4] Allowed for desserts at lunch as specified in §210.10, and for breakfasts served under the SBP.

continued on next page

Whole Grain-Rich Ounce Equivalency (Oz Eq) Requirements for School Meal Programs[1, 2] (continued)

GROUP D	OZ EQ FOR GROUP D
• Doughnuts[4] (cake and yeast raised, unfrosted) • Cereal bars, breakfast bars, granola bars[4] (plain) • Muffins (all, except corn) • Sweet roll[4] (unfrosted) • Toaster pastry[4] (unfrosted)	1 oz eq = 55 g or 2.0 oz 3/4 oz eq = 42 g or 1.5 oz 1/2 oz eq = 28 g or 1.0 oz 1/4 oz eq = 14 g or 0.5 oz
GROUP E	**OZ EQ FOR GROUP E**
• Cereal bars, breakfast bars, granola bars[4] (with nuts, dried fruit, and/or chocolate pieces) • Cookies[3] (with nuts, raisins, chocolate pieces and/or fruit purees) • Doughnuts[4] (cake and yeast raised, frosted or glazed) • French toast • Sweet rolls[4] (frosted) • Toaster pastry[4] (frosted)	1 oz eq = 69 g or 2.4 oz 3/4 oz eq = 52 g or 1.8 oz 1/2 oz eq = 35 g or 1.2 oz 1/4 oz eq = 18 g or 0.6 oz
GROUP F	**OZ EQ FOR GROUP F**
• Cake[3] (plain, unfrosted) • Coffee cake[4]	1 oz eq = 82 g or 2.9 oz 3/4 oz eq = 62 g or 2.2 oz 1/2 oz eq = 41 g or 1.5 oz 1/4 oz eq = 21 g or 0.7 oz
GROUP G	**OZ EQ FOR GROUP G**
• Brownies[3] (plain) • Cake[3] (all varieties, frosted)	1 oz eq = 125 g or 4.4 oz 3/4 oz eq = 94 g or 3.3 oz 1/2 oz eq = 63 g or 2.2 oz 1/4 oz eq = 32 g or 1.1 oz
GROUP H	**OZ EQ FOR GROUP H**
• Cereal grains (barley, quinoa, etc) • Breakfast cereals (cooked)[5, 6] • Bulgur or cracked wheat • Macaroni (all shapes) • Noodles (all varieties) • Pasta (all shapes) • Ravioli (noodle only) • Rice (enriched white or brown)	1 oz eq = 1/2 cup cooked or 1 ounce (28 g) dry
GROUP I	**OZ EQ FOR GROUP I**
• Ready-to-eat breakfast cereal (cold, dry) [5, 6]	1 oz eq = 1 cup or 1 ounce for flakes and rounds 1 oz eq = 1.25 cups or 1 ounce for puffed cereal 1 oz eq = 1/4 cup or 1 ounce for granola

[5] Refer to program regulations for the appropriate serving size for supplements served to children ages 1 through 5 in the National School Lunch Program; and meals served to children ages 1 through 5 and adult participants in the Child and Adult Care Food Program. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

[6] Cereals must be whole grain, or whole grain and enriched or fortified cereal.

Formulation Statement for Documenting Grains in School Meals

Required Beginning School Year (SY) 2013-2014

(Crediting standards Based on Grams of Creditable Grains)

School Food Authorities (SFAs) should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. Grain products may be credited based on previous standards through SY 2012-2013. The new crediting standards for grains (as outlined in Policy Memorandum SP 30 2012) must be used beginning SY 2013-2014. SFAs have the option to choose the crediting method that best fits the specific needs of the menu planner.

Product Name:_____ Code No.: _____

Manufacturer:_____ Serving Size: _____
(raw dough weight may be used to calculate creditable grain amount)

I. Does the product meet the whole grain-rich criteria: q Yes q No
(*Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.*)

II. Does the product contain noncreditable grains: q Yes q No **How many grams:** _____
(*Products with more than 0.24 ounce equivalent (oz eq) or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.)*

***III.* Use Policy Memorandum SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program: Exhibit A to determine if the product fits into Groups A-G (baked goods), Group H (cereal grains), or Group I (ready-to-eat breakfast cereals).** *(Different methodologies are applied to calculate servings of the grain component based on creditable grains. Groups A-G use the standard of 16 grams creditable grain per oz eq; Group H uses the standard of 28 grams creditable grain per oz eq; and Group I is reported by volume or weight.)*

Indicate to which Exhibit A Group (A-I) the product belongs: _____

Description of Creditable Grain Ingredient*	Grams of Creditable Grain Ingredient per Portion[1] A	Gram Standard of Creditable Grain per oz equivalent *(16 g or 28 g)* [2] B	Creditable Amount A ÷ B
Total Creditable Amount[3]			

* Creditable grains are whole-grain meal/flour and enriched meal/flour.
[1] (Serving size) **X** (% of creditable grain in formula). Please be aware that serving sizes other than grams must be converted to grams.
[2] Standard grams of creditable grains from the corresponding Group in Exhibit A.
[3] Total Creditable Amount must be rounded ***down*** to the nearest quarter (0.25) oz eq. Do ***not*** round up.

Total weight (per portion) of product as purchased _____

Total contribution of product (per portion)_____oz equivalent

I certify that the above information is true and correct and that a_____ounce portion of this product (ready for serving) provides_____oz equivalent Grains. I further certify that noncreditable grains **are not** above 0.24 oz eq. per portion.
Products with more than 0.24 oz equivalent or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.

Signature_____ Title _____

Printed Name_____ Date_____ Phone Number _____

Formulation Statement for Documenting Grains in School Meals

Required Beginning School Year (SY) 2013-2014

Crediting standards Based on Revised exhibit A weights per ounce equivalent (oz eq)

School Food Authorities (SFAs) should include a copy of the label from the purchased product carton in addition to the following information on letterhead signed by an official company representative. Grain products may be credited based on previous standards through SY 2012-2013. The new crediting standards for grains (as outlined in Policy Memorandum SP 30 2012) must be used beginning SY 2013-2014. SFAs have the option to choose the crediting method that best fits the specific needs of the menu planner.

Product Name:_____ Code No.: _____

Manufacturer:_____ Serving Size: _____

I. Does the product meet the whole grain-rich criteria: q Yes q No
(*Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.*)

II. Does the product contain noncreditable grains: q Yes q No **How many grams:** _____
(*Products with more than 0.24 oz eq or 3.99 grams for Groups A-G and 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.)*

***III.* Use Policy Memorandum SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program: Exhibit A to determine if the product fits into Groups A-G (baked goods), Group H (cereal grains), or Group I (ready-to-eat breakfast cereals).** (*Please be aware that different methodologies are applied to calculate servings of grain component based on creditable grains. Groups A-G use the standard of 16 grams creditable grain per oz eq; Group H uses the standard of 28 grams creditable grain per oz eq; and Group I is reported by volume or weight.)*

Indicate to which Exhibit A Group (A-I) the product belongs: _____

Description of Product per Food Buying Guide	Portion Size of Product as Purchased A	Weight of 1.0 ounce equivalent as listed in SP 30-2012 B	Creditable Amount A ÷ B
Total Creditable Amount[1]			

[1] Total Creditable Amount must be rounded **down** to the nearest quarter (0.25) oz eq. Do **not** round up.

Total weight (per portion) of product as purchased _____

Total contribution of product (per portion)_____oz equivalent

I further certify that the above information is true and correct and that a_____ounce portion of this product (ready for serving) provides_____oz equivalent grains. I further certify that noncreditable grains **are not** above 0.24 oz eq. per portion. Products with more than 0.24 oz equivalent or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.

Signature_____ Title _____

Printed Name_____ Date_____ Phone Number _____

Formulation Statement for Documenting Grains in School Meals

Required Beginning School Year (SY) 2013-2014

(Crediting standards Based on Grams of Creditable Grains)

School Food Authorities (SFAs) should include a copy of the label from the purchased product package in addition to the following information on letterhead signed by an official company representative. Grain products may be credited based on previous standards through SY 2012-2013. The new crediting standards for grains (as outlined in Policy Memorandum SP 30 2012) must be used beginning SY 2013-2014. SFAs have the option to choose the crediting method that best fits the specific needs of the menu planner.

Product Name: Wheat Smile Pancakes Code No.: 14005

Manufacturer: ABC Bread Company Serving Size: 2 pancakes -50g (1.75oz)

(raw dough weight may be used to calculate creditable grain amount)

I. Does the product meet the Whole Grain-Rich Criteria: ☒ Yes ☐ No

(*Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.*)

II. Does the product contain noncreditable grains: ☐ Yes ☒ No **How many grams:** _____

(*Products with more than 0.24 oz equivalent or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.)*

***III.* Use Policy Memorandum SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program: Exhibit A to determine if the product fits into Groups A-G (baked goods), Group H (cereal grains) or Group I (RTE breakfast cereals).** *(Different methodologies are applied to calculate servings of grain component based on creditable grains. Groups A-G use the standard of 16 grams creditable grain per oz eq; Group H uses the standard of 28 grams creditable grain per oz eq; and Group I is reported by volume or weight.)*

Indicate to which Exhibit A Group (A-I) the product belongs: C

Description of Creditable Grain Ingredient*	Grams of Creditable Grain Ingredient per Portion[1] A	Gram Standard of Creditable Grain per oz equivalent *(16g or 28g)* [2] B	Creditable Amount A ÷ B
Whole wheat flour (47%)	23.5	16	1.4687
Enriched flour (22%)	11	16	.6875
			2.15
Total Creditable Amount[3]			**2.00**

* Creditable grains are whole-grain meal/flour and enriched meal/flour.

1 (Serving size) **X** (% of creditable grain in formula). Please be aware that serving sizes other than grams must be converted to grams.

2 Standard grams of creditable grains from the corresponding Group in Exhibit A.

3 Total Creditable Amount must be rounded ***down*** to the nearest quarter (0.25) oz eq. Do ***not*** round up.

Total weight (per portion) of product as purchased 50 g (1.75oz)

Total contribution of product (per portion) 2.00 oz equivalent

I certify that the above information is true and correct and that a 1.75 ounce portion of this product (ready for serving) provides 2.00 oz equivalent Grains. I further certify that noncreditable grains **are not** above 0.24 oz eq. per portion. Products with more than 0.24 oz equivalent or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.

Signature _____ Title _____

Printed Name _____ Date _____ Phone Number _____

Formulation Statement for Documenting Grains in School Meals

Required Beginning School Year (SY) 2013-2014

Crediting standards Based on Revised exhibit A weights per ounce equivalent (oz eq)

School Food Authorities (SFAs) should include a copy of the label from the purchased product carton in addition to the following information on letterhead signed by an official company representative. Grain products may be credited based on previous standards through SY 2012-2013. The new crediting standards for grains (as outlined in Policy Memorandum SP 30 2012) must be used beginning SY 2013-2014. SFAs have the option to choose the crediting method that best fits the specific needs of the menu planner.

Product Name: Wheat Smile Pancakes Code No.: 14005

Manufacturer: ABC Bread Company Serving Size: 2 pancakes 50g (1.75oz)

I. Does the product meet the whole grain-rich criteria: ☒ Yes ☐ No
(*Refer to SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program.*)

II. Does the product contain noncreditable grains: ☐ Yes ☒ No **How many grams:** _____
(*Products with more than 0.24 oz eq or 3.99 grams for Groups A-G and 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.)*

***III.* Use Policy Memorandum SP 30-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program: Exhibit A to determine if the product fits into Groups A-G (baked goods), Group H (cereal grains), or Group I (RTE breakfast cereals).** (*Please be aware that different methodologies are applied to calculate servings of grain component based on creditable grains. Groups A-G use the standard of 16 grams creditable grain per oz eq; Group H uses the standard of 28 grams creditable grain per oz eq; and Group I is reported by volume or weight.)*

Indicate to which Exhibit A Group (A-I) the product belongs: C

Description of Product per Food Buying Guide	Portion Size of Product as Purchased A	Weight of 1.0 ounce equivalent as listed in SP 30-2012 B	Creditable Amount[1] A ÷ B
Pancakes	50 grams	34 grams	1.47
Total Creditable Amount[2]			**1.25**

[1] Total Creditable Amount must be rounded **down** to the nearest quarter (0.25) oz eq. Do **not** round up.

Total weight (per portion) of product as purchased 50 g

Total contribution of product (per portion) 1.25 oz equivalent

I certify that the above information is true and correct and that a 1.75 ounce portion of this product (ready for serving) provides 1.25 oz equivalent grains. I further certify that noncreditable grains **are not** above 0.24 oz eq. per portion. Products with more than 0.24 oz equivalent or 3.99 grams for Groups A-G or 6.99 grams for Group H of noncreditable grains may not credit towards the grain requirements for school meals.

Signature _____ Title _____

Printed Name _____ Date _____ Phone Number _____

HealtherUS School Challenge Whole Grain-Rich Criteria

The HealthierUS School Challenge (HUSSC) is a voluntary certification initiative established in 2004 to recognize those schools participating in the National School Lunch Program that have created healthier school environments through promotion of nutrition and physical activity.

In February 2010, the HealthierUS School Challenge was incorporated into the White House's ***Let's Move!*** campaign to raise a healthier generation of kids. At that time, monetary **incentive awards** became available for each HUSSC award level: Bronze, Silver, Gold, and Gold Award of Distinction.

The goal of the HealthierUS School Challenge is to improve the health of the Nation's children by promoting healthier school environments. To help meet the goal, the **Food and Nutrition Service** (FNS) identifies schools that have made changes to

1. improve the quality of the foods served,
2. provide students with nutrition education, and
3. provide students with physical education and opportunities for physical activity.

For more information on the HealthierUS School Challenge and to apply, please visit http://www.fns.usda.gov/tn/HealthierUS/index.html

HealthierUS School Challenge Whole Grain-Rich Criteria:

Breakfast

- *Gold Award of Distinction*
  100 percent of grains offered weekly meet whole grain-rich criteria.
- *Gold*
  70 percent of grains offered weekly meet whole grain-rich criteria.
- *Bronze/Silver*
  50 percent of grains offered weekly meet whole grain-rich criteria.

Lunch

- *Gold/Gold Award of Distinction*
  All grains offered meet whole grain-rich criteria.
- *Bronze/Silver*
  Two-thirds of the grains offered over a week meet whole grain-rich criteria.

Criteria for Whole Grain-Rich Variety:

- *Bronze/Silver/Gold*
  At least three different types of foods offered during the week meet whole grain-rich criteria.
- *Gold Award of Distinction*
  Same as above plus only 1.0 ounce equivalent grains per week may be a grain-based dessert.

continued on next page

How Can Schools Comply With the HealthierUS School Challenge (HUSSC) Whole Grain-Rich Criteria?

Menu planners should count whole grains to meet the criteria as follows:

Breakfast:
Prior to school year 2014-2015, for Bronze and Silver award levels, at least half of the grains offered at breakfast must meet whole grain-rich criteria. For Gold award levels, at least 70 percent of grains offered must meet whole-grain rich criteria, and for Gold Award of Distinction, all grains offered must meet whole grain-rich criteria.

After school year 2014-2015, all grains served at breakfast must meet whole grain-rich criteria for **all** HUSSC award levels. This is consistent with the meal pattern requirements for that school year and beyond.

Lunch:
Prior to school year 2014-2015, for Bronze and Silver award levels, at least two-thirds of the grains offered at lunch over a week must meet whole grain-rich criteria. For the Gold Award and Gold Award of Distinction, all grains offered must meet whole grain-rich criteria.

After school year 2014-2015, all grains served at lunch must meet whole grain-rich criteria for **all** HUSSC award levels. This is consistent with the meal pattern requirements for that school year and beyond.

Additionally, menu planners are encouraged to serve a variety of foods that meet whole grain-rich criteria and may not serve the same product every day to count for the HUSSC whole grain-rich criteria. For Bronze, Silver, and Gold awards at lunch, at least three different types of foods meeting the whole grain-rich criteria must be offered during the week. Of the weekly total for lunch, up to two (2.0) ounce equivalent grains per week may be in the form of a grain-based dessert. For a Gold Award of Distinction, the same variety criteria are in place; however, only one grain offering per week may be a grain-based dessert at lunch.

Food And Drug Administration Modernization Act (FDAMA) Requirements for Health Claims Related to Whole Grain Foods

(1) Health Claim Notification for Whole Grain Foods with Moderate Fat Content

http://www.fda.gov/Food/IngredientsPackagingLabeling/LabelingNutrition/ucm073634.htm

"Diets rich in whole grain foods and other plant foods, and **low in saturated fat and cholesterol**, may help reduce the risk of heart disease." Manufacturers may use the specified claim on the label and in labeling of any food product that meets the eligibility criteria described in the Kraft notification (and stated below), unless or until FDA or a court acts to prohibit the claim.

The Kraft notification defined "whole grain foods," as specified in the 1999 whole grain notification, as foods that contain 51% or more whole grain ingredient(s) by weight per reference amount customarily consumed (RACC). FDA intends to assess compliance with this definition in the use of the proposed health claim by reference to the dietary fiber level of whole wheat, the predominant grain in the U.S. diet. Whole wheat contains 11 grams of dietary fiber per 100 grams; thus, the qualifying amount of dietary fiber required for a food to bear the prospective claim may be determined by the following formula: 11 grams x 51% x RACC/100:

- 3.0 g per RACC of 55 g
- 2.8 g per RACC of 50 g
- 2.5 g per RACC of 45 g
- 1.7 g per RACC of 35 g

The Kraft notification states that in order for foods to qualify for the proposed claim the foods must:

(1) contain a minimum of 51% whole grains (using dietary fiber as a marker);

(2) meet the regulatory definitions for "low saturated fat" and "low cholesterol;"

(3) bear quantitative *trans* fat labeling; and

(4) contain less than 6.5 grams total fat and 0.5 gram or less trans fat per RACC.

To meet the definitions in (2) noted above, the qualifying foods must contain 1 gram or less of saturated fat and 20 milligrams or less of cholesterol per RACC.

(2) Whole Grain Foods and Risk of Heart Disease and Certain Cancers

http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064919.htm

"Diets rich in whole grain foods and other plant foods and **low in total fat, saturated fat, and cholesterol** may reduce the risk of heart disease and some cancers."

continued on next page

Food And Drug Administration Modernization Act (FDAMA) Requirements for Health Claims Related to Whole Grain Foods (continued)

FDAMA (FDA Modernization Act) Health Claims (Health Claims Authorized Based on an Authoritative Statement by Federal Scientific Bodies)			
Approved Claims	**Food Requirements**	**Claim Requirements**	**Model Claim Statements**
Whole Grain Foods and Risk of Heart Disease and Certain Cancers *(Docket No. 1999P-2209)*	Contains 51 percent or more whole grain ingredients by weight per RACC, and Dietary fiber content at least: • 3.0 g per RACC of 55 g • 2.8 g per RACC of 50 g • 2.5 g per RACC of 45 g • 1.7 g per RACC of 35 g Low fat	***Required wording of the claim:*** **"Diets rich in whole grain foods and other plant foods and low in total fat, saturated fat, and cholesterol may reduce the risk of heart disease and some cancers."**	NA

Definitions of Nutrient Content Claims

http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/LabelingNutrition/ucm064911.htm

Nutrient	Free	Low	Reduced/Less	Comments
Total Fat *21 CFR 101.62(b)*	Less than 0.5 g per RACC and per labeled serving (or for meals and main dishes, less than 0.5 g per labeled serving) *(b)(1)* Contains no ingredient that is fat or understood to contain fat, except noted below (*7).	3 g or less per RACC (and per 50 g if RACC is small) *(b)(2)* Meals and main dishes: 3 g or less per 100 g and not more than 30% of calories from fat *(b)(3)*	At least 25% less fat per RACC than an appropriate reference food (or for meals and main dishes, at least 25% less fat per 100g) *(b)(4) & (5)* Reference food may not be "Low Fat"	" % Fat Free": may be used if food meets the requirements for "Low Fat" *21 CFR 101.62(b)(6)* 100% Fat Free: food must be "Fat Free" *(b)(6)(iii)* "Light"–see previous Calorie comments For dietary supplements: total fat claims cannot be made for products that are 40 calories or less per serving *21 CFR 101.62(a)(4)*
Saturated Fat *21 CFR 101.62(c)*	Less than 0.5 g saturated fat and less than 0.5 g trans fatty acids per RACC and per labeled serving (or for meals and main dishes, less than 0.5 g saturated fat and less than 0.5 g trans fatty acids per labeled serving) *(c)(1)* Contains no ingredient that is understood to contain saturated fat except as noted below (*8)	1 g or less per RACC and 15% or less of calories from saturated fat *(c)(2)* Meals and main dishes: 1 g or less per 100 g and less than 10% of calories from saturated fat *(c)(3)*	At least 25% less saturated fat per RACC than an appropriate reference food (or for meals and main dishes, at least 25% less saturated fat per 100g) *(c)(4) & (5)* Reference food may not be "Low Saturated Fat"	Next to all saturated fat claims, must declare the amount of cholesterol if 2 mg or more per RACC; and the amount of total fat if more than 3 g per RACC (or 0.5 g or more of total fat per RACC for "Saturated Fat Free") (or for meals and main dishes, per labeled serving) *21 CFR 101.62(c)* For dietary supplements: saturated fat claims cannot be made for products that are 40 calories or less per serving *21 CFR 101.62(a)(4)*
Cholesterol *21 CFR 101.62(d)*	Less than 2 mg per RACC and per labeled serving (or for meals and main dishes, less than 2 mg per labeled serving) Contains no ingredient that contains cholesterol except as noted below (*9) *(d)(1)*	20 mg or less per RACC (and per 50 g of food if RACC is small) *(d)(2)* Meals and main dishes: 20 mg or less per 100 g *(d)(3)*	At least 25% less cholesterol per RACC than an appropriate reference food (or for meals and main dishes, at least 25% less cholesterol per 100g) *(d)(4) & (5)* Reference food may not be "Low Cholesterol"	Cholesterol claims only allowed when food contains 2 g or less saturated fat per RACC; or for meals and main dish products, per labeled serving size for "Free" claims or per 100 g for "Low" and "Reduced/Less" claims Must declare the amount of total fat next to cholesterol claim when fat exceeds 13 g per RACC and labeled serving (or per 50 g of food if RACC is small), or when the fat exceeds 19.5 g per labeled serving for main dishes or 26 g for meal products For dietary supplements: cholesterol claims cannot be made for products that are 40 calories or less per serving

U.S. Department of Agriculture
Food and Nutrition Service
FNS-464
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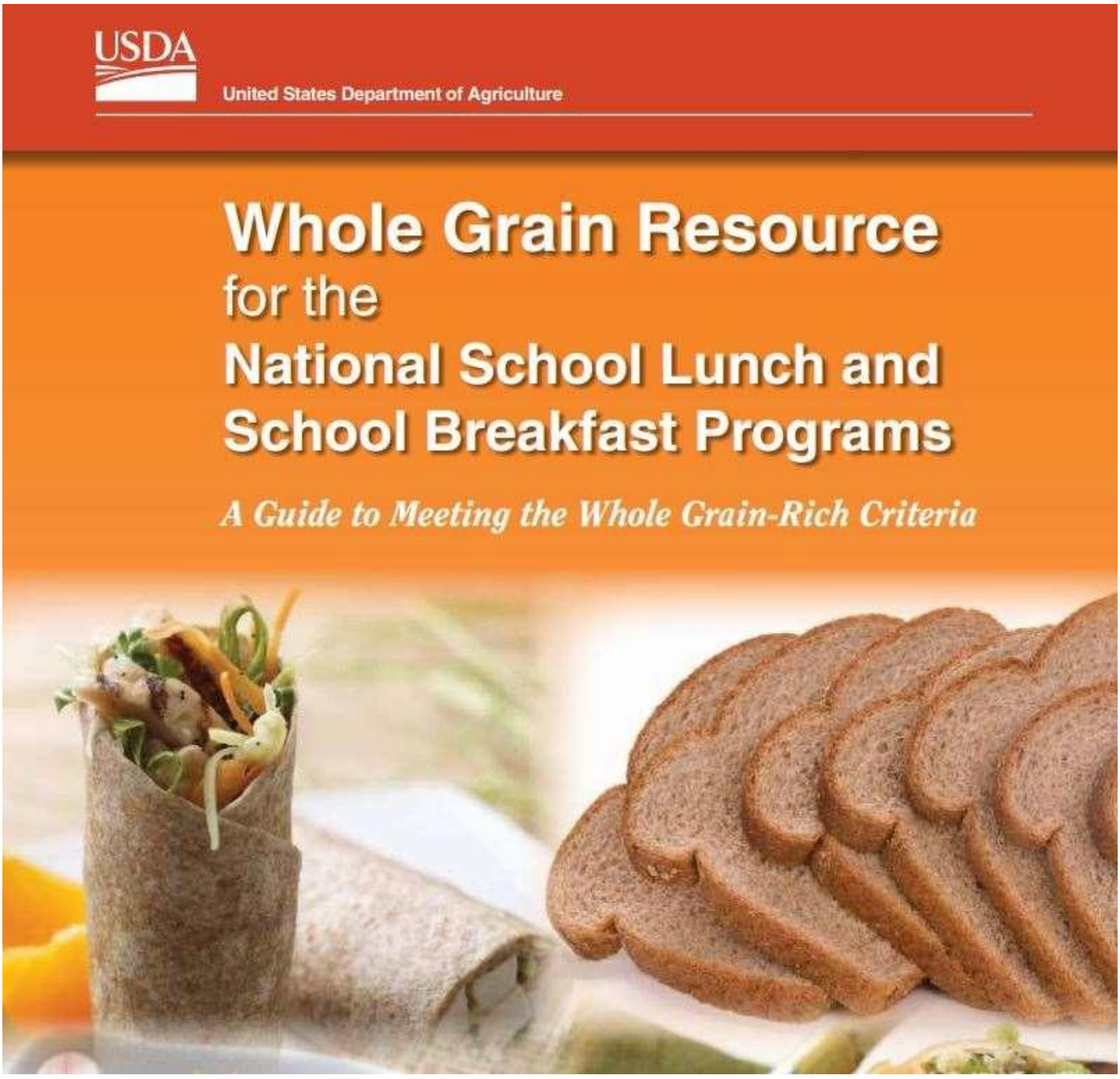
Whole Grain Resources Cover

Can be found here: http://doe.sd.gov/cans/documents/GrainChrt.pdf



Whole Grain Rich Grain/Bread Chart

Can be found here: https://doe.sd.gov/cans/documents/BreadGrains.pdf

Breads and Grains Chart

(Exhibit A: Grain Requirement for Child Nutrition Programs[1,2])

GROUP A	MINIMUM SERVING SIZE FOR GROUP A	Ounce Equivalents (Oz. Eq.) for Group A
• Bread type coating • Bread sticks (hard) • Chow mien noodles • Savory crackers (saltines and snack crackers) • Croutons • Pretzels (hard) • Stuffing (dry) Note: weights apply to bread in stuffing	1 serving = 20 gm or 0.7 oz ¾ serving = 15 gm or 0.5 oz ½ serving = 10 gm or 0.4 oz ¼ serving = 5 gm or 0.2 oz	1 oz. eq. = 22 gm or 0.8 oz. ¾ oz. eq. = 17 gm or 0.6 oz. ½ oz. eq. = 11 gm or 0.4 oz. ¼ oz. eq. = 6 gm or 0.2 oz.
GROUP B	**MINIMUM SERVING SIZE FOR GROUP B**	**Oz. Eq. for Group B**
• Bagels • Batter type coating • Biscuits • Breads – all (for example, sliced, French, Italian) • Buns (hamburger and hotdog) • Sweet crackers[5] (graham crackers - all shapes, animal crackers) • Egg roll skins • English muffins • Pita bread • Pizza crust • Pretzels (soft) • Rolls • Tortillas • Tortilla chips • Taco shells	1 serving = 25 gm or 0.9 oz ¾ serving = 19 gm or 0.7 oz ½ serving = 13 gm or 0.5 oz ¼ serving = 6 gm or 0.2 oz	1 oz. eq. = 28 gm or 1.0 oz. ¾ oz. eq. = 21 gm or 0.75 oz. ½ oz. eq. = 14 gm or 0.5 oz. ¼ oz. eq. = 7 gm or 0.25 oz.
GROUP C	**MINIMUM SERVING SIZE FOR GROUP C**	**Oz. Eq. for Group C**
• Cookies[3] (plain – includes vanilla wafers) • Cornbread • Corn muffins • Croissants • Pancakes • Pie crust (dessert pies[3], cobbler[3], fruit turnovers[4], and meat/meat alternate pies) • Waffles	1 serving = 31 gm or 1.1 oz ¾ serving = 23 gm or 0.8 oz ½ serving = 16 gm or 0.6 oz ¼ serving = 8 gm or 0.3 oz	1 oz. eq. = 34 gm or 1.2 oz. ¾ oz. eq. = 26 gm or 0.9 oz. ½ oz. eq. = 17 gm or 0.6 oz. ¼ oz. eq. = 9 gm or 0.3 oz.

Breads and Grains Chart

(Exhibit A: Grain Requirement for Child Nutrition Programs[1,2])

GROUP A	MINIMUM SERVING SIZE FOR GROUP A	Ounce Equivalents (Oz. Eq.) for Group A
• Bread type coating • Bread sticks (hard) • Chow mien noodles • Savory crackers (saltines and snack crackers) • Croutons • Pretzels (hard) • Stuffing (dry) Note: weights apply to bread in stuffing	1 serving = 20 gm or 0.7 oz ¾ serving = 15 gm or 0.5 oz ½ serving = 10 gm or 0.4 oz ¼ serving = 5 gm or 0.2 oz	1 oz. eq. = 22 gm or 0.8 oz. ¾ oz. eq. = 17 gm or 0.6 oz. ½ oz. eq. = 11 gm or 0.4 oz. ¼ oz. eq. = 6 gm or 0.2 oz.
GROUP B	**MINIMUM SERVING SIZE FOR GROUP B**	**Oz. Eq. for Group B**
• Bagels • Batter type coating • Biscuits • Breads – all (for example, sliced, French, Italian) • Buns (hamburger and hotdog) • Sweet crackers[5] (graham crackers - all shapes, animal crackers) • Egg roll skins • English muffins • Pita bread • Pizza crust • Pretzels (soft) • Rolls • Tortillas • Tortilla chips • Taco shells	1 serving = 25 gm or 0.9 oz ¾ serving = 19 gm or 0.7 oz ½ serving = 13 gm or 0.5 oz ¼ serving = 6 gm or 0.2 oz	1 oz. eq. = 28 gm or 1.0 oz. ¾ oz. eq. = 21 gm or 0.75 oz. ½ oz. eq. = 14 gm or 0.5 oz. ¼ oz. eq. = 7 gm or 0.25 oz.
GROUP C	**MINIMUM SERVING SIZE FOR GROUP C**	**Oz. Eq. for Group C**
• Cookies[3] (plain – includes vanilla wafers) • Cornbread • Corn muffins • Croissants • Pancakes • Pie crust (dessert pies[3], cobbler[3], fruit turnovers[4], and meat/meat alternate pies) • Waffles	1 serving = 31 gm or 1.1 oz ¾ serving = 23 gm or 0.8 oz ½ serving = 16 gm or 0.6 oz ¼ serving = 8 gm or 0.3 oz	1 oz. eq. = 34 gm or 1.2 oz. ¾ oz. eq. = 26 gm or 0.9 oz. ½ oz. eq. = 17 gm or 0.6 oz. ¼ oz. eq. = 9 gm or 0.3 oz.

[1] In NSLP and SBP (grades K-12), all grains must meet whole grain-risk criteria. For information on flexibilities, please contact your State agency. For all other Child Nutrition Programs, grains are whole grain or enriched or made with enriched or whole-grain meal and/or flour, bran, and/or germ. Under CACFP and NSLP/SBP infant and preschool meals, at least one grain serving per day must meet whole grain-rich criteria.

[2] For NSLP and SBP (grades K-12), grain quantities are determined using ounce equivalents (oz. eq.). All other Child Nutrition Programs determine grain quantities using grains/bread servings. Beginning October 1, 2019, grain quantities in CACFP and NSLP/SBP infant and preschool meals will be determined using oz. eq. 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.

[3] Allowed in NSLP (up to 2.0 oz. eq. grain-based dessert per week in grades K-12) as specified in §210.10 and at snack service in SFSP. Considered as a grain-based dessert in §226.20(a)(4) and 201.10.

[5] Allowed in NSLP (up to 2.0 oz. eq. grain-based dessert per week in grades K-12) as specified in §210.10. May count towards the train component in SBP (grades K-12) and at snack and breakfast meals in SFSP

GROUP D	MINIMUM SERVING SIZE FOR GROUP D	Oz. Eq. for Group D
• Cereal bars, breakfast bars, granola bars [4] (plain) • Doughnuts[4] (cake and yeast raised, unfrosted) • Muffins (all, except corn) • Sweet roll [4] (unfrosted) • Toaster pastry [4] (unfrosted)	1 serving = 50 gm or 1.8 oz ¾ serving = 38 gm or 1.3 oz ½ serving = 25 gm or 0.9 oz ¼ serving = 13 gm or 0.5 oz	1 oz. eq. = 55 gm or 2.0 oz. ¾ oz. eq. = 42 gm or 1.5 oz. ½ oz. eq. = 28 gm or 1.0 oz. ¼ oz. eq. = 14 gm or 0.5 oz.
GROUP E	**MINIMUM SERVING SIZE FOR GROUP E**	**Oz. Eq. for Group E**
• Cereal bars, breakfast bars, granola bars [4] (with nuts, dried fruit, and/or chocolate pieces) • Cookies [3] (with nuts, raisins, chocolate pieces and/or fruit purees) • Doughnuts [4] (cake and yeast raised, frosted or glazed) • French toast • Sweet rolls [4] (frosted) • Toaster pastry [4] (frosted)	1 serving = 63 gm or 2.2 oz ¾ serving = 47 gm or 1.7 oz ½ serving = 31 gm or 1.1 oz ¼ serving = 16 gm or 0.6 oz	1 oz. eq. = 69 gm or 2.4 oz. ¾ oz. eq. = 52 gm or 1.8 oz. ½ oz. eq. = 35 gm or 1.2 oz. ¼ oz. eq. = 18 gm or 0.6 oz.
GROUP F	**MINIMUM SERVING SIZE FOR GROUP F**	**Oz. Eq. for Group F**
• Cake[3] (plain, unfrosted) • Coffee cake [4]	1 serving = 75 gm or 2.7 oz ¾ serving = 56 gm or 2 oz ½ serving = 38 gm or 1.3 oz ¼ serving = 19 gm or 0.7 oz	1 oz. eq. = 82 gm or 2.9 oz. ¾ oz. eq. = 62 gm or 2.2 oz. ½ oz. eq. = 41 gm or 1.5 oz. ¼ oz. eq. = 21 gm or 0.7 oz.
GROUP G	**MINIMUM SERVING SIZE FOR GROUP G**	**Oz. Eq. for Group G**
• Brownies [3] (plain) • Cake [3] (all varieties, frosted)	1 serving = 115 gm or 4 oz ¾ serving = 86 gm or 3 oz ½ serving = 58 gm or 2 oz ¼ serving = 29 gm or 1 oz	1 oz. eq. = 125 gm or 4.4 oz. ¾ oz. eq. = 94 gm or 3.3 oz. ½ oz. eq. = 63 gm or 2.2 oz. ¼ oz. eq. = 32 gm or 1.1 oz.
GROUP H	**MINIMUM SERVING SIZE FOR GROUP H**	**Oz. Eq. for Group H**
• Cereal Grains (barley, quinoa, etc.) • Breakfast cereals (cooked) [6, 7] • Bulgur or cracked wheat • Macaroni (all shapes) • Noodles (all varieties) • Pasta (all shapes) • Ravioli (noodle only) • Rice	1 serving = ½ cup cooked or 25 gm dry	1 serving = ½ cup cooked or 1 oz. (28 gm) dry
GROUP I	**MINIMUM SERVING SIZE FOR GROUP I**	**Oz. Eq. for Group I**
• Ready to eat breakfast cereal (cold dry) [6, 7]	1 serving = ¾ cup or 1 oz, whichever is less	1 oz. eq. = 1 cup or 1 ounce for flakes and rounds 1 oz. eq. = 1.25 cups or 1 ounce for puffed cereal 1 oz. eq. = ¼ cup or 1 ounce for granola

[4] Allowable in NSLP (up to 2.0 oz. eq. grain-based dessert per week in grades K-12) as specified in §210.10. may count towards the grain component in SBP (grades K-12) and at snack and breakfast meals in SFSP. Considered a grain =based dessert and cannot count towards the grain component in the CACFP and NSLP/SBP infant and preschool meals beginning October 1, 2017, as specified in §§226.20(a)(4) and 210.10.

[6] Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; breakfast served in the SBP, 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.

[7] In the NSLP and SBP, cereals must list a whole grain as the first ingredient and be fortified, or if the cereal is 100 percent whole grain, fortification is not required. For CACFP and SFSP, cereals must be whole-grain, enriched, or fortified; cereals served in the CACFP and NSLP/SBP infant and preschool meals must contain no more than 6 grams of sugar per dry ounce.

Production Records Cover

Breakfast/Snack Production Record/Example

Can be found here: https://doe.sd.gov/cans/documents/Breakfast.xlsx

Lunch Production Record/Example

Can be found here: https://doe.sd.gov/cans/documents/Lunchprod.xlsx

Multi-Day Food Bar

Can be found here:

Example: https://doe.sd.gov/cans/documents/MDayBFdEx.pdf

Blank form: https://doe.sd.gov/cans/documents/MDayBarFB.docx

Food Production Record Handbook

Can be found here: https://doe.sd.gov/cans/documents/ProdRecrd2.pdf

SD Daily Production Record Instructions – Breakfast and Snack Only

This production record must be completed on a daily basis to document a reimbursable breakfast or snack was offered. Production records should be used as a planning tool for providing a reimbursable meal. This production record may be altered only upon preapproval from CANS.

Record the date of the daily menu, school district, and site name.
Indicate if you allow offer versus serve and the grades OVS is allowed.
Purchased a la carte: Are students able to purchase second servings of anything such as a second entrée, milk, etc.? Purchased seconds need to be recorded in the a la carte/adults column with serving size and number of planned servings. If students are able to purchase additional foods, these extra servings will not be included in the daily and weekly requirements or in the menu analysis for calories, sodium, and fats.
Planned Seconds: Are students offered free seconds? The serving size and number of planned, free seconds by grade group must be recorded. Free extra servings will be included in your daily and weekly requirements and will count toward the calories, sodium, and fats.

Remember to check with the cashier/point of service meal count person after the meal is over and record the actual meal counts by grade group and adults in the upper right hand corner.

Column A
Record the food item and the form it comes in such as frozen, canned, fresh, etc. or the recipe number of the recipe that was used. The product code number of a branded product could also be recorded here or in column I. For example, Puck Brand #3456 pancake on a stick.

Grains/Bread Column A
Grains must be recorded in ounce equivalents per the new grain/bread chart in memo SP 30-2012 that can be found on the CANS NSLP website at http://doe.sd.gov/cans/documents/G-BChartn.pdf. Gram weights will be converted to ounce equivalents. For example, 45g of bread is equal to 1.5 oz equiv. (45g divided by 28g = 1.6 round down to the nearest 0.25 ounce equivalent or 1.5 oz eq).

Other Foods Column A
Fruit and vegetables should be recorded in cups.

Meat/Meat alternate must be recorded in ounce equivalents as noted on the product CN label. If it is not a CN labeled product consult the Food Buying Guide that can be found on the USDA Team Nutrition Resource Library website (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) for proper crediting information.

If you are offering a daily food bar check the box in this section to indicate you have a food bar form that accompanies the daily production record. If you do not have a daily food bar, use this section to record other items that do not fit into the other component sections such as syrup, jelly, margarine, record these here along with serving size, number of planned servings, total units prepared, etc.

Column B Food Temperature
Record the food temperature of your foods here if you want OR continue to record them on the SOP form. Use whatever works best for you, just remember to update your Food Safety Plan procedures to reflect your current practice. Remember you need to keep all production records for 3 years plus the current year.

Columns C, D, & E Grade Groups K-12, K-8, K-5, 6-8, 9-12
Record the serving size and estimated number of planned servings for each food item offered to each grade group.

Column F Planned (FREE) Seconds by Grade Group
Record the serving size and an estimated number of any planned free seconds in this column. Remember that any free seconds must be included in daily and weekly requirements for the meal pattern and will be included in the nutrient analysis during the review.

Column G A la Carte (PURCHASED EXTRA FOOD)/Adults
Record the serving size and an estimated number of planned servings in this column for each food item that is purchased. Additional purchased foods do not count toward any of the component daily and weekly requirements for the meal pattern and will not be included in the nutrient analysis during the reivew.

Column H Total Planned Servings (slices, cups, etc)
Record the total number of servings needed for each food item by adding the planned servings columns taking into consideration the serving sizes. Sometimes serving size will be the same for all grade groups. Sometimes the serving size will differ. If you menu plan different serving sizes you will need to convert all servings to one serving size. For example, if there are 100 - ½ cup servings and 150 - 1 cup servings, the total planned servings would be 200 cups. (100 - ½ cups = 50 cups and 50 + 150 = 200 cups). This column helps you determine the total number of units of each food item to prepare.

Column I Total Units Prepared (lbs, #10 cans, # of recipes, etc)
Record the total number of units you will prepare in pounds, #10 cans, # of recipes, etc. This should be done prior to the day the meal is served so food service staff will know how much food to prepare. This is also a good place to record the product code number for a branded product if not recorded in column A. For example, Tony's Pepperoni Pizza #3456. When recording cases of something you must also record the number or pounds per case. For example, if you were serving corndogs, you would record 75/case. For fresh fruit or vegetable, record the pounds per case.

Column J Amounts added(+) or leftover(-)
Recording amounts of food leftover or added during the meal service is important. Record any amount added to the total units prepared by marking with a (+). For example, + 1 #10 can. Record amounts of food leftover by marking with a (-). For example, - ½ #10 can. Recording additions or leftovers helps with your future menu planning.

July 3, 2014

DAILY BREAKFAST or SNACK PRODUCTION RECORD SCHOOL YEAR _____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes: No: _____
OVS Grades: _____
Purchased A la Carte? Yes: No: _____
Free Seconds? Yes: No: _____

Meal Counts		
	Planned	Actual
K-5:		
6-8:		
9-12:		
Adults:		
Total:		

Serving Size			Breakfast Menu
K-5	6-8	9-12	

A	B	C		D		E		F		G		H	I	J
Menu Item Recipe Name & Breakfast Burrito J02 Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-5		Grades: 6-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Grains/Bread (Reminder: 1 oz eq minimum grain requirement before M/MA)														
& Meat/Meat Alternate														
Fruits (1 cup)														
or Vegetable (Reminder: 2 cups from Red/Orange, Beans, Peas (Legumes), Dark Green, or Other subgroup planned before Starchy subgroup)														
o See Food Bar Form														
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored														
Other Foods (Condiments, etc.)														
o See Food Bar Form														

DAILY BREAKFAST or SNACK PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes: No: _____
OVS Grades: _____
Purchased A la Carte? Yes: No: _____
Free Seconds? Yes: No: _____

Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

Serving Size		Breakfast Menu
K-8	9-12	

A	B	C		D		F		G		H	I	J
Menu Item Recipe Name & Breakfast Burrito J02 Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Grains/Bread (Reminder: 1 oz eq minimum grain requirement before M/MA) & Meat/Meat Alternate												
Fruits (1 cup) or Vegetable (Reminder: 2 cups from Red/Orange, Beans, Peas (Legumes), Dark Green, or Other subgroup planned before Starchy subgroup)												
o See Food Bar Form												
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Other Foods (Condiments, etc.)												

DAILY BREAKFAST or SNACK PRODUCTION RECORD SCHOOL YEAR_____

DATE: Example date

School Dist: Example school
Site Name: Example Site

Offer Versus Serve: Yes: x No: _____
OVS Grades: K-12
Purchased A la Carte? Yes: _____ No: x
Free Seconds? Yes: _____ No: x

Meal Counts

	Planned	Actual
K-8:	155	159
9-12:	30	27
Adults:	15	15
Total:	200	201

Serving Size K-8	Serving Size 9-12	Breakfast Menu
1 each	1 each	Pancake on a Stick OR
1 each	1 each	Oatmeal (1/2c) with Toast (1 slice)
1/2 cup	1/2 cup	100% Orange Juice
1/2 cup	1/2 cup	Fresh Blueberries
1 cup	1 cup	Milk Choice

A	B	C		D		F		G		H	I	J
Menu Item Recipe Name & Breakfast Burrito J02 Product Name & Code# (Brand Name 1234)	Food Tempera ure	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Grains/Bread (Breakfast Reminder: 1 oz eq minimum grain requirement before M/MA) & Meat/Meat Alternate												
Pancake on a Stick Puck Brand #3456		1 each	100	1 each	17			1 each	10	127 each	130 each	-5 each
CN 1 oz eq MMA/2 oz eq G												
OR												
Oatmeal cooked, 1/2 cup = 1oz eq		1/2 cup	55	1/2 cup	13			1/2 cup	5	73 - 1/2 cups	2-42 oz boxes	-7 cups
& WG toast Mara Gee Brand 9874,		1 slice	55	1 slice	13			1 slice	5	73 slices	3 - 1lb 4oz loaves	-12 slices
28g = 1oz eq												
Fruits (1 cup) or Vegetable (Reminder: 2 cups from Red/Orange, Beans, Peas (Legumes), Dark Green, or Other subgroup planned before Starchy subgroup)												
o See Food Bar Form												
100% orange juice		1/2 cup	155	1/2 cup	30			1/2 cup	15	200	200 4 oz cartons	none
Blueberries, fresh		1/2 cup	155	1/2 cup	30			1/2 cup	15	200	20#	-3#
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Skim white		1/2 pint	135	1/2 pint	15			1/2 pint	10	160 1/2 pint	160 1/2 ints	-20
White 1%		1/2 pint	20	1/2 pint	15			1/2 pint	5	40 1/2 pints	40 1/2 pints	none
Other Foods (Condiments, etc.)												
o See Food Bar Form												
Syrup, 2T		1 pkt	155	1 pkt	30			1 pkt	15	200	205 pkts	-25
Margarine, 2T		1 pkt	55	1 pkt	13			1 pkt	5	73	100 pkts	-35

DAILY BREAKFAST or SNACK PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes: No: _____
OVS Grades: _____
Purchased A la Carte? Yes: No: _____
Free Seconds? Yes: No: _____

Meal Counts

	Planned	Actual
K-12		
Adults:		
Total:		

Serving Size K-12	Breakfast Menu

A	B	C	D	F		G		H	I	J
Menu Item Recipe Name & Breakfast Burrito J02 Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Grains/Bread (Reminder: 1 oz eq minimum grain requirement before M/MA)										
& Meat/Meat Alternate										
Fruits (1 cup)										
or Vegetable (Reminder: 2 cups from Red/Orange, Beans, Peas (Legumes), Dark Green, or Other subgroup planned before Starchy subgroup)before Starchy subg										
o See Food Bar Form										
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored										
Other Foods (Condiments, etc.)										
o See Food Bar Form										

DAILY BREAKFAST or SNACK PRODUCTION RECORD SCHOOL YEAR_____

DATE: Example date

School Dist: Example School
Site Name: Example Site

Offer Versus Serve: Yes: X No: _____
OVS Grades: K-12
Purchased A la Carte? Yes: No: X
Free Seconds? Yes: No: X

Meal Counts

	Planned	Actual
K-12	185	184
Adults:	15	15
Total:	200	199

Serving Size K-12	Breakfast Menu
1 each	Pancake on a Stick
1/2 cup	100% Orange Juice
1/2 cup	Fresh Blueberries
1 cup	Milk choice

A	B	C	D	F		G		H	I	J
Menu Item Recipe Name & Breakfast Burrito J02 Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Grains/Bread (Reminder: 1 oz eq minimum grain requirement before M/MA)										
& Meat/Meat Alternate										
Pancake on a Stick Puck Brand #3456 CN 1 oz eq MMA/2 oz eq G		1 each	185			1 each	15	200	205	-5
Fruits (1 cup)										
or Vegetable (Reminder: 2 cups from Red/Orange, Beans, Peas (Legumes), Dark Green, or Other subgroup planned before Starchy subgroup)										
o See Food Bar Form										
100% orange juice		1/2 cup	185			1/2 cup	15	200	200 4 oz cartons	none
Blueberries, fresh		1/2 cup	185			1/2 cup	15	200	20#	-3#
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored										
Skim white		1/2 pint	150			1/2 pint	10	160 1/2 pint	160 1/2 ints	-2
White 1%		1/2 pint	35			1/2 pint	5	40 1/2 pints	40 1/2 pints	none
Other Foods (Condiments, etc.)										
Syrup, 2T		1 pkt	185			1 pkt	15	200	205	-5

Breakfast/Snack production records

Can be found here: https://doe.sd.gov/cans/documents/Breakfast.xlsx

SD Daily Production Record Instructions – Breakfast and Snack Only

This production record must be completed on a daily basis to document a reimbursable breakfast or snack was offered. Production records should be used as a planning tool for providing a reimbursable meal. **This production record may be altered only upon preapproval from CANS.**

Record the date of the daily menu, school district, and site name.
Indicate if you allow offer versus serve and the grades OVS is allowed.
Purchased a la carte: Are students able to purchase second servings of anything such as a second entrée, milk, etc.? Purchased seconds need to be recorded in the a la carte/adults column with serving size and number of planned servings. If students are able to purchase additional foods, these extra servings will not be included in the daily and weekly requirements or in the menu analysis for calories, sodium, and fats.
Planned Seconds: Are students offered free seconds? The serving size and number of planned, free seconds by grade group must be recorded. Free extra servings will be included in your daily and weekly requirements and will count toward the calories, sodium, and fats.

Remember to check with the cashier/point of service meal count person after the meal is over and record the actual meal counts by grade group and adults in the upper right hand corner.

Lunch production records

Can be found here: https://doe.sd.gov/cans/documents/Lunchprod.xlsx

SD Daily Production Record Instructions – Lunch Only

This production record must be completed on a daily basis to document a reimbursable lunch was offered. Production records should be used as a planning tool for providing a reimbursable meal. **This production record may be altered only upon preapproval from CANS.**

Record the date of the daily menu, school district, and site name. If you are also using the SD Menu Planning Worksheet, you will enter your menu items in that document also. The Menu Planning Worksheet will make it easier to ensure your lunch menus meet requirements.

Indicate if you allow offer versus serve and the grades OVS is allowed.
Purchased a la carte: Are students able to purchase second servings of anything such as a second entrée, milk, etc.? Purchased seconds need to be recorded in the a la carte/adults column with serving size and number of planned servings. If students are able to purchase additional foods, these extra servings will not be included in the daily and weekly requirements or in the menu analysis for calories, sodium, and fats.
Planned Seconds: Are students offered free seconds? The serving size and number of planned, free seconds by grade group must be recorded. Free extra servings will be included in your daily and weekly requirements and will count toward the calories, sodium, and fats.
Remember to check with the cashier/point of service meal count person after the meal is over and record the actual meal counts by grade group and adults in the upper right hand corner.

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: Example Date

School Dist: Example School
Site Name: Example Site

Offer Versus Serve: Yes: X No:____
OVS Grades: K-12
Purchased A la Carte? Yes: _____ No: X
Free Seconds? Yes: _____ No: X

Meal Counts

	Planned	Actual
K-8:	110	113
9-12:	170	164
Adults:	20	18
Total:	300	295

Serving Size K-8	Serving Size 9-12	Lunch Menu
1 each	1 each	Hamburger on whole wheat bun
1/2 cup	1/2 cup	Baked Beans
3/4 cup	1 cup	Fresh broccoli florets
1/2 cup	1 cup	Pinapple chunks, canned
1 cup	1 cup	Milk Choice

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8 Serving Size	Grades: K-8 Planned Servings	Grades: 9-12 Serving Size	Grades: 9-12 Planned Servings	Planned Seconds (By Grade Groups) Serving Size	Planned Seconds (By Grade Groups) Planned Servings	A la Carte, Adults Serving Size	A la Carte, Adults Planned Servings	Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
Meat/Meat Alternate												
Hamburger Patty Puck Brand#1234		1 each	110	1 each	170			1 each	20	300 patties	300 patties	-5
CN 2 oz eq MMA												
Grains/Bread												
WG hamburger bun (2 oz=2 oz eq G)												
Mara Gee Brand		1 each	110	1 each	170			1 each	20	300	300	-5
Fruits												
☐ See Food Bar Form												
Pinapple, Chunk, canned in juice		1/2 cup	60	1 cup	100			1 cup	20	150 cups	12 #10 cans	- 1/2 #10 can
Vegetables												
☐ See Food Bar Form												
Baked Beans, canned vegetarian		1/2 cup	60	1/2 cup	100			1 cup	20	100 cups	9 #10 cans	none
Fresh broccoli florets		3/4 cup	60	1 cup	100			1 cup	20	165 cups	25#	-1.75#
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Chocolate Skim		1/2 pint	100	1/2 pint	125			1/2 pint	20	245 1/2 pint	245 1/2 ints	-3
White 1%		1/2 pint	10	1/2 pint	5			1/2 pint	0	15 1/2 pints	15 1/2 pints	-1
Other Foods (Condiments, etc.)												
❒ See Food Bar Form												

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _
Site Name: _

Offer Versus Serve: Yes:_____ No: _____
OVS Grades: _____
Purchased A la Carte? Yes: _____ No: _
Free Seconds? Yes: _____ No: _

Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

Serving Size		Lunch Menu
K-8	9-12	

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
Grains/Bread												
Fruits												
☐ See Food Bar Form												
Vegetables												
☐ See Food Bar Form												
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Other Foods (Condiments, etc.)												
☐ See Food Bar Form												

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes: No: _____
OVS Grades: _____
Purchased A la Carte? Yes: No: _____
Free Seconds? Yes: No: _____

Meal Counts

	Planned	Actual
K-5:		
6-8:		
9-12:		
Adults:		
Total:		

Serving Size			Lunch Menu
K-5	6-8	9-12	

A	B	C		D		E		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-5		Grades: 6-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate														
Grains/Bread														
Fruits														
☐ See Food Bar Form														
Vegetables														
☐ See Food Bar Form														
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored														
Other Foods (Condiments, etc.)														
☐ See Food Bar Form														

SD Daily Production Record Instructions – Lunch Only

This production record must be completed on a daily basis to document a reimbursable lunch was offered. Production records should be used as a planning tool for providing a reimbursable meal. This production record may be altered only upon preapproval from CANS.

Record the date of the daily menu, school district, and site name. If you are also using the SD Menu Planning Worksheet, you will enter your menu items in that document also. The Menu Planning Worksheet will make it easier to ensure your lunch menus meet requirements.

Indicate if you allow offer versus serve and the grades OVS is allowed.
Purchased a la carte: Are students able to purchase second servings of anything such as a second entrée, milk, etc.? Purchased seconds need to be recorded in the a la carte/adults column with serving size and number of planned servings. If students are able to purchase additional foods, these extra servings will not be included in the daily and weekly requirements or in the menu analysis for calories, sodium, and fats.
Planned Seconds: Are students offered free seconds? The serving size and number of planned, free seconds by grade group must be recorded. Free extra servings will be included in your daily and weekly requirements and will count toward the calories, sodium, and fats.
Remember to check with the cashier/point of service meal count person after the meal is over and record the actual meal counts by grade group and adults in the upper right hand corner.

Column A
Record the food item and the form it comes in such as frozen, canned, fresh, etc. or the recipe number of the recipe that was used. The product code number of a branded product could also be recorded here or in column I. For example, Puck Brand breaded chicken patty CN #1234

Grains/Bread Column A
Grains must be recorded in ounce equivalents per the new grain/bread chart in memo SP 30-2012 that can be found on the CANS NSLP website at http://doe.sd.gov/cans/documents/G-BChartn.pdf. Gram weights will be converted to ounce equivalents. For example, 45g of bread is equal to 1.5 oz equiv. (45g divided by 28g = 1.6 round down to the nearest 0.25 ounce equivalent or 1.5 oz eq).

Other Foods Column A
Fruit and vegetables should be recorded in cups.
Meat/Meat alternate must be recorded in ounce equivalents as noted on the product CN label. If it is not a CN labeled product consult the Food Buying Guide that can be found on the USDA Team Nutrition Resource Library website (http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs) for proper crediting information.
If you are offering a daily food bar check the box in this section to indicate you have a food bar form that accompanies the daily production record. If you do not have a daily food bar, use this section to record other items that do not fit into the other component sections such as syrup, jelly, margarine, record these here along with serving size, number of planned servings, total units prepared, etc.

Other food items that do not fit into the other component sections or are not creditable components such as ice cream, pudding, potato chips record these here along with serving size, number of planned servings, total units prepared, etc.

Column B Food Temperature
Record the food temperature of your foods here if you want OR continue to record them on the SOP form. Use whatever works best for you, just remember to update your Food Safety Plan procedures to reflect your current practice. Remember you need to keep all production records for 3 years plus the current year.

Columns C, D, & E Grade Groups K-8, K-5, 6-8, 9-12
Record the serving size and an estimated number of planned servings for each food item offered to the grade groups you are using.

Column F Planned (FREE) Seconds by Grade Group
Record the serving size and an estimated number of planned free seconds in this column. Remember that any free seconds must be included in daily and weekly requirements for the meal pattern and will be included in the nutrient analysis during the review.

Column G A la Carte (PURCHASED EXTRA FOOD)/Adults
Record the serving size and an estimated number of planned servings in this column for each food item that is purchased. Additional purchased foods do not count toward any of the component daily and weekly requirements for the meal pattern and will not be included in the nutrient analysis during the reivew.

Column H Total Planned Servings (slices, cups, etc.)
Record the total number of servings needed for each food item by adding the planned servings columns taking into consideration the serving sizes. Sometimes serving size will be the same for all grade groups. Sometimes the serving size will differ. If you menu plan different serving sizes you will need to convert all servings to one serving size. For example, if there are 100 - ½ cup servings and 150 - 1 cup servings, the total planned servings would be 200 cups. (100 - ½ cups = 50 cups and 50 + 150 = 200 cups). This column helps you determine the total number of units of each food item to prepare.

Column I Total Units Prepared (lbs, #10 cans, # of recipes, etc.)
Record the total number of units you will prepare in pounds, #10 cans, # of recipes, etc. This should be done prior to the day the meal is served so food service staff will know how much food to prepare. This is also a good place to record the product code number for a branded product if not recorded in column A. For example, Pony's Pepperoni Pizza #3456. When recording cases of something you must also record the number of items or pounds per case. For example, if you were serving corndogs, you would record 75/case. For fresh fruit or vegetable, record the pounds per case.

Column J Amounts added(+) or leftover(-)
Recording amounts of food leftover or added during the meal service is important. Record any amount added to the total units prepared by marking with a (+). For example, + 1 #10 can. Record amounts of food leftover by marking with a (-). For example, - ½ #10 can. Recording additions or leftovers helps with your future menu planning.

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes:_____No: _____
OVS Grades: _____
Purchased A la Carte? Yes:_____No: _____
Free Seconds? Yes:_____No: _____

Meal Counts

	Planned	Actual
K-5:		
6-8:		
9-12:		
Adults:		
Total:		

Serving Size			Lunch Menu
K-5	6-8	9-12	

A	B	C		D		E		F		G		H	I	J
Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (D35) Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-5		Grades: 6-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate														
Grains/Bread														
Fruits														
o See Food Bar Form														
Vegetables														
o See Food Bar Form														
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored														
Other Foods (Condiments, etc.)														
o See Food Bar Form														

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes: No: _____
OVS Grades: _____
Purchased A la Carte? Yes: No: _____
Free Seconds? Yes: No: _____

Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

Serving Size		Lunch Menu
K-8	9-12	

A	B	C		D		F		G		H	I	J
Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (D35) Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
Grains/Bread												
Fruits												
o See Food Bar Form												
Vegetables												
o See Food Bar Form												
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Other Foods (Condiments, etc.)												
o See Food Bar Form												

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: Example Date

School Dist: Example School
Site Name: Example Site

Offer Versus Serve: Yes: X No:
OVS Grades: K-12
Purchased A la Carte? Yes: No: X
Free Seconds? Yes: No: X

Meal Counts

	Planned	Actual
K-8:	110	113
9-12:	170	164
Adults:	20	18
Total:	300	295

Serving Size K-8	Serving Size 9-12	Lunch Menu
1 each	1 each	Hamburger on whole wheat bun
1/2 cup	1/2 cup	Baked Beans
3/4 cup	1 cup	Fresh broccoli florets
1/2 cup	1 cup	Pinapple chunks, canned
1 cup	1 cup	Milk Choice

A	B	C		D		F		G		H	I	J
Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (D35) Product Name & Code# (Brand Name 1234)	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
Hamburger Patty Puck Brand#1234 CN 2 oz eq MMA		1 each	110	1 each	170			1 each	20	300 patties	300 patties	-5
Grains/Bread												
WG hamburger bun (2 oz=2 oz eq G) Mara Gee Brand		1 each	110	1 each	170			1 each	20	300	300	-5
Fruits												
o See Food Bar Form Pinapple, Chunk, canned in juice		1/2 cup	60	1 cup	100			1 cup	20	150 cups	12 #10 cans	- 1/2 #10 can
Vegetables												
o See Food Bar Form												
Baked Beans, canned vegetarian		1/2 cup	60	1/2 cup	100			1 cup	20	100 cups	9 #10 cans	none
Fresh broccoli florets		3/4 cup	60	1 cup	100			1 cup	20	165 cups	25#	-1.75#
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Chocolate Skim		1/2 pint	100	1/2 pint	125			1/2 pint	20	245 1/2 pint	245 1/2 ints	-3
White 1%		1/2 pint	10	1/2 pint	5			1/2 pint	0	15 1/2 pints	15 1/2 pints	-1
Other Foods (Condiments, etc.)												
□ See Food Bar Form												

Multi-Day Food/Condiment Bar Production Record

School District Name: **Site Name:**

This production record is designed for schools that have an ongoing fruit/vegetable bar. It can also be used to track condiments. Write in items used routinely before copying the form. Use the Vegetable Subgroup Key column to record the abbreviation for the following vegetable subgroups served: **RO**=Red Orange; **DG**=Dark Green; **BP**=Beans & Peas (Legumes); **S**=Starchy; **WG** (whole grain)

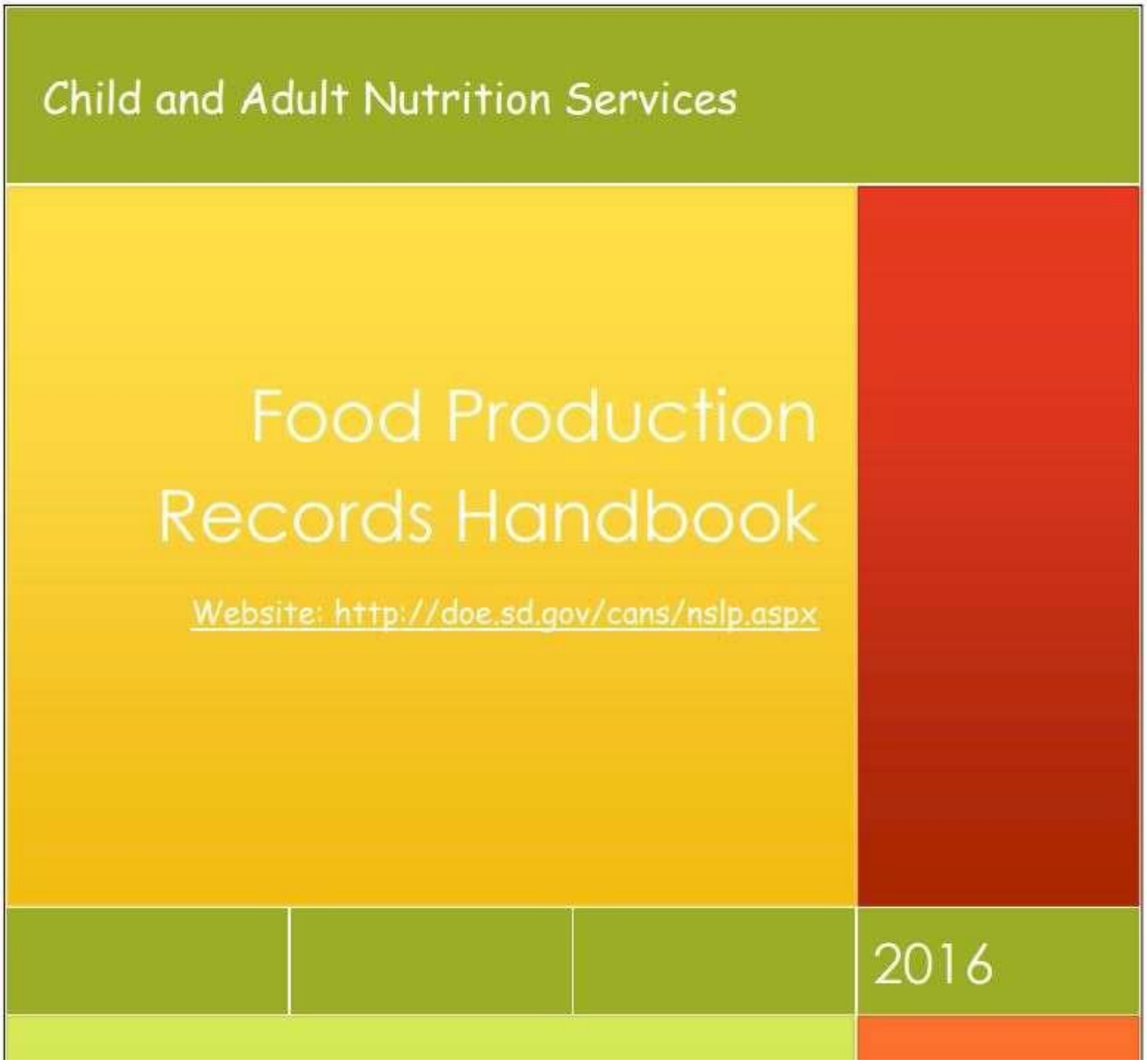
☐ Food bar is **before** point of service ☐ Food bar is **after** point of service

Week of: May 10 **Year: 2012**				Monday	Tuesday	Wednesday	Thursday	Friday
Record Daily Participation: Elm (K-5) M (6-8) HS (9-12) A (Adult) ⇨				E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=
Food Items Used and Form (fresh, frozen, canned)	**Product Brand # or School Recipe (SR#) *or* Commodity (C)**	**Vegetable Subgroup Key**	**Unit of Weight or Volume *or* # of Servings**	Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.				

Food Items Used and Form (fresh, frozen, canned)	**Product Brand # or School Recipe (SR) *or* Commodity (C)**	**Vegetable Subgroup Key**	**Unit of Weight or Volume *or* # of Servings**	Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.				

Food Production Record Handbook

Can be found here: https://doe.sd.gov/cans/documents/ProdRecrd2.pdf



2016

This institution is an equal opportunity provider

Questions? Comments? Concerns? Contact the Child and Adult Nutrition Services (CANS) Office!

800 Governors Dive

Pierre, SD 57501

Phone: (605)-773-3413

Fax: (605)-773-6846

Email: doe.schoollunch@state.sd.us

Website: https://doe.sd.gov/cans

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Chapter 1- Introduction

What are production records?

Production records keep track of the food you serve at each snack or meal every day. Think of them like a receipt you get when you go grocery shopping. Production records monitor what food is served to students, how much is made for the day, and what food is left at the end of the day. These records are very important. When you fill out these records, the Child and Adult Nutrition Services will determine if your meals and snacks meet the meal pattern requirements. This documentation is required to receive your federal meal reimbursement (which means money!). So, it is very important that you fill out our form

correctly. This handbook will help you step by step to fill out a great production record! You can see a full production record on the next page.

Federal Regulations

Daily production records are required by federal regulations 7 CFR 2D.10(a)(3). If you need a reminder of the federal regulations, they are listed at this website.

http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=3823767be9b298803ad7bee630652cad&mc=true&tpl=/ecfrbrowse/Title07/7CIIsubchapA.tpl

OR

www.fns.usda.gov/school-meals/regulations

Each new school year, be sure to check the CANS templates to see if there are any required changes to the template! The current templates can be found on the CANS website:
http://doe.sd.gov/cans/nslp.aspx
Under section: *Menu Planning*

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes:____ No: ____
OVS Grades: _____
Purchased A la Carte? Yes____ No: ____
Free Seconds? Yes____ No: ____

Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

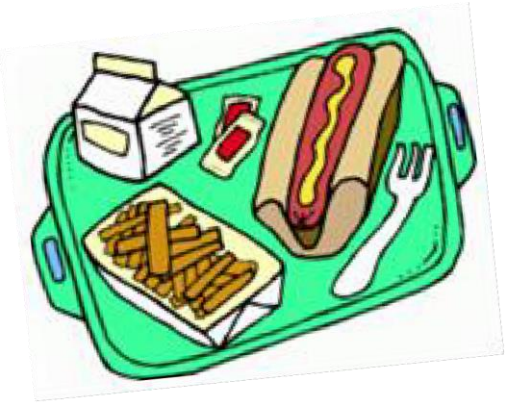
Serving Size		Lunch Menu
K-8	9-12	

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name (ESA)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
Grains/Bread												
Fruits												
☐ See Food Bar Form												
Vegetables												
☐ See Food Bar Form												
2 Milk Choices: 1% unflavored, skim flavored, skim unflavored												
Other Foods (Condiments, etc.)												
☐ See Food Bar Form												

SAMPLE

Chapter 2- How to Read Your Record

At first glance, production records seem complicated. There are a lot of boxes that need to be filled. Don't Worry. We will go over how to fill out your record by figuring out what each section means and tips to fill it out properly. We will look at the lunch production record in this handbook, but you fill out the breakfast and snack record the same way. Let's start by explaining each section.



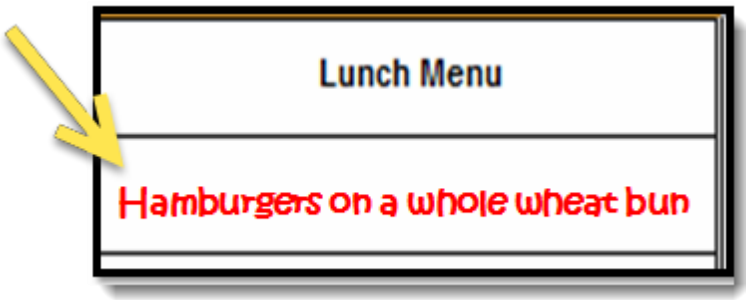
A. Starting At The Top

School Information

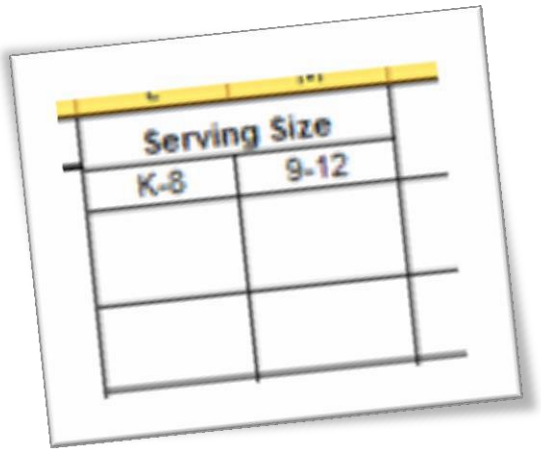
Each production record requires you to put your school's information at the top, left-hand corner of the record.
The first portion is the School year. Here is where we will put the correct school year. The rest of this section asks you today's date, your school district, where you are feeding, and some other questions we will answer in Chapter 3A.

Serving Size and Menu

The serving size and Menu can be found in the top right corner of your record. This section is where you put what you are having for lunch that day. There is a line for each item on the menu, including one for milk. The serving size portion



of the record is where you tell us how much of each menu item you are giving the students. For example, if you are serving hamburgers for lunch today, and each student gets one hamburger, then you would put 1 each, or one patty, for a serving size. If you are serving a fruit or a vegetable, record your serving size in cups, for example ½ cup mandarin oranges.



B. Menu Item

This section can be found in Column A of your record

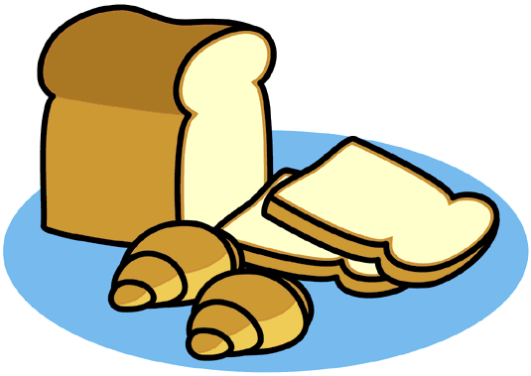
Record each component separately to show a complete meal is planned and served

Meat/Meat Alternate

The first section of the menu item is the Meat/ Meat Alternate section. Here is where you put the hamburger patty and cheese and any other meal or meat alternative you are serving that day. You will also need to know the brand and product code or the recipe name and number.

Grains/ Bread

This section is where the grains of all kinds go. The bun for the cheeseburger will go in this section.



Be sure to include the type of grain as well. If your bun was a wholegrain bun, then you will be asked to put whole grain in the description.

Fruits

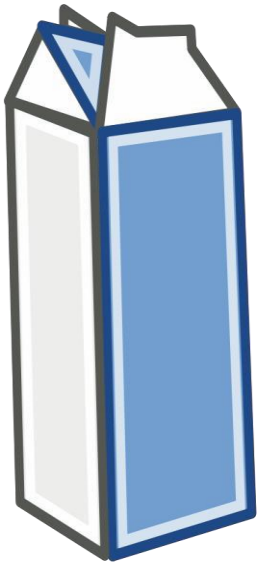
Here is where the fruits you prepare and serve will go. You will include the type of fruit you served and how much was served in cups.

Vegetables

Just like the fruit, you will put your vegetables in this section. You will put down every kind of veggie you served, if you had more than one, and how much was served in cups.

2 Milk Choices

All schools are required to give students a choice of milk. In the milk section, you will include all of the milk choices. Chocolate skim and white skim or 1% milk are the choices.



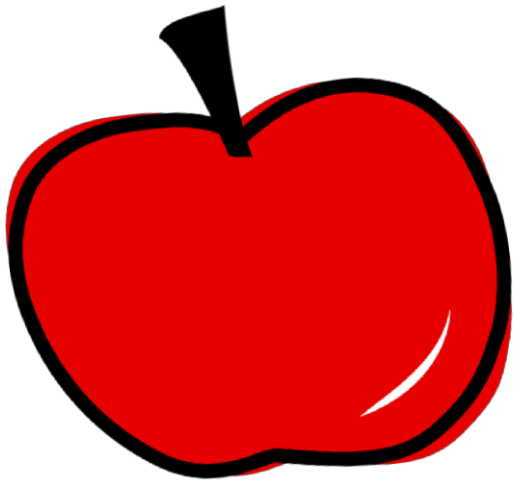
Other Foods, (Condiments, etc.)

Ketchup, mustard, ranch dressing, mayonnaise, etc.: all of these tasty toppers and dippers are called condiments. Condiments are also required on your production record. Desserts and any other foods that do not count as components should also be recorded here (things like cheese sauce, croutons, ice cream bar).

C. Grades

All of these will be found in Columns C, D, or E

In the production record, there are sections for grade levels. Make sure to pay attention to these and how many you have on your record. If you feed in grade groups of K-5, 6-8, and 9-12, be sure that you are using the production record that has those grade groups. Or if you feed in grade groups of K-8 and 9-12, be sure that you have the right production record for those grade groups.



Serving Sizes

Your serving size is where you put how much of each item each student will receive. You will do this for each grade group that you have in your record. If you were to serve K-8 and 9-12, and gave your K-8 students ½ cup of peaches for the day, in your serving size column, you would enter '1/2 cup'.

Planned Servings

Your planned serving counts for how many servings you plan on serving to that age group that day. If you had 30 students in your K-8, and you plan to feed peaches to all of the 30 students, you would enter 30 into the planned servings column for your K-8 students. Be cautious not to confuse the two (serving size and planned servings).

D. Planned Seconds

These will be recorded in Column F

Some schools offer free seconds, while other schools do not. If you do not offer free seconds, simply skip this section and leave it blank.

Serving Size

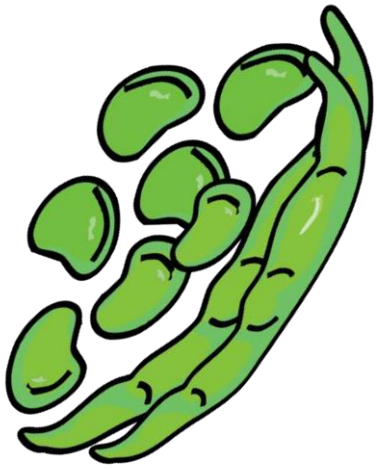
If you do not serve free seconds, don't fill out this section. Your serving size will be how much you are going to give your students for seconds. For example, if you are going to give students another hamburger patty for seconds, then you would put 1 patty, or 1 each.

Seconds

Planned Servings

Here is where you tell us how many servings of seconds you plan on giving. If you have 50 students at your lunch room, and normally all of them have seconds, then you would enter 50 into this section.

E. A la Carte, Adults



A la Carte and Adult Meals will be recorded in Column G

Are you wondering what a la Carte is? That's ok! A la Carte is food items that are **sold separate** from the regular menu. Like a second milk. If a student wants to purchase a 2nd milk, this would count as an A la Carte item.

Adults are also able to eat school lunches.

Both A la Carte and Adults would go under this section. Record the adult meals the same way you would record your student meals.

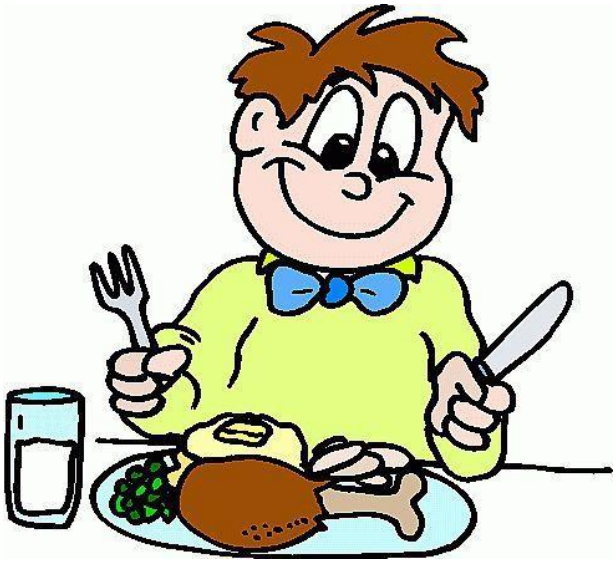
If your school sells a la carte and offers adult meals, but does not allow free seconds, you may move a la carte to Column F ("Planned Seconds") because a la carte and adult meals should be recorded separately.

Serving Size

Just like in the sections before, serving size is how much you are going to give each person. If you are going to give each person one burger, you will put 1 each in this section.

Planned Servings

Planned servings for A la Carte and Adult meals are the same as the others. If you plan to serve 10 adults at meal time, then you will put 10 down for planned servings.



F. Total Planned Servings

We will record this section in Column H

Total planned servings is exactly what it sounds like. In this column you will add together all of the planned servings you wrote down in the grade groups (Columns C, D, and possibly E), planned second (Column F), a la carte, and adults (Column G).

Step-by-step instructions to convert serving sizes can be found in the fruit and vegetable section.

G. Total Units Prepared

This will be in Column I

Here is where we will figure out how much food you need to prepare for the meal. This number should be enough food to cover your total planned servings. Use the Food Buying Guide OR your recipe to determine the units. For example, if you had 150 cups of total planned servings, you will need to find out how many #10 cans it took to give you 150 cups. Here is a picture of an example. The red (left) circle is the total planned servings and the blue (right) circle is the total units prepared.

H. Amount Added or Leftover

Fill this out in Column J

In this section, you will record if you had to add extra food to what you had prepared, if you had just the right amount of food, or if you had leftovers. If you had to add food, you will put a plus sign (+) in front of the number of extra units of food you needed to make. If

you had just the right amount of food, you will simply put 'none' or zero. If you had leftovers, you will put a negative sign (-) in front of how many leftover items you had.

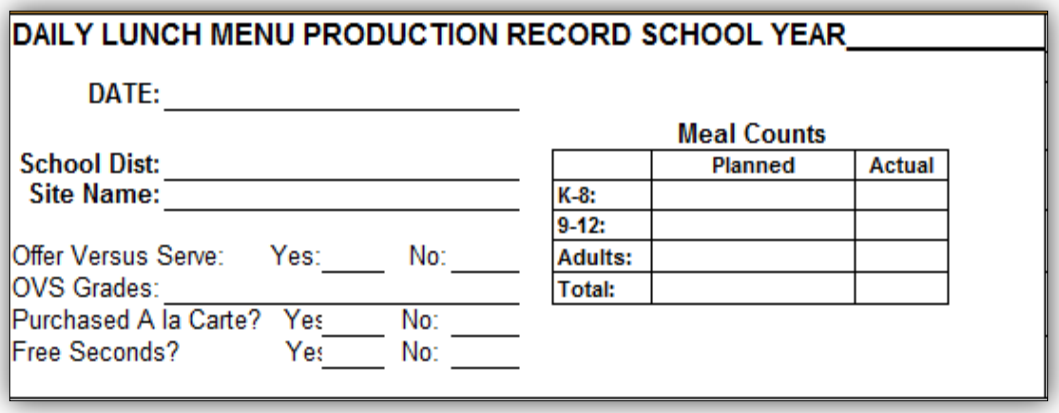
Now that we know all of the parts of the production record, we can begin to fill it out!

Chapter 3- Filling Out Your Record

Let's start filling out your Food Production Record!

A. School Information

Here is what the portion for School Information looks like: Let's take this line by line.



DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR_____

DATE: _____

School Dist: _____
Site Name: _____

Offer Versus Serve: Yes:____ No:____
OVS Grades: _____
Purchased A la Carte? Yes____ No:____
Free Seconds? Yes____ No:____

Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

Line 1: The first line is the Daily Lunch Menu Production Record School Year. On this line, put the school year you are currently in.

DAILY LUNCH MENU PRODUCTION RECORD SCHOOL YEAR 2016-2017

Line 2: The next line is for the date. Put today's date on this line.

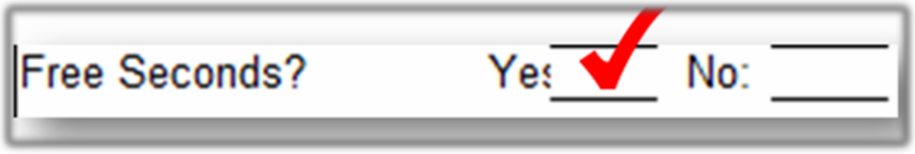
Lines 3 and 4: Your School District and Site Name will go on these lines.

Lines 5 and 6: This is where you tell us if you have Offer Versus Serve (OVS). OVS is a concept that applies to menu planning and the meal service. OVS allows students to decline some of the food offered in a reimbursable lunch or breakfast. The goals of OVS are to reduce food waste and to permit students to choose the foods they want to eat. If you have OVS, tell us what grades you serve to. Check yes if you have OVS or no if you do not.

OVS is required for grades 9-12 at lunch. OVS is optional at lunch for grades K-8 and for all grades at breakfast.

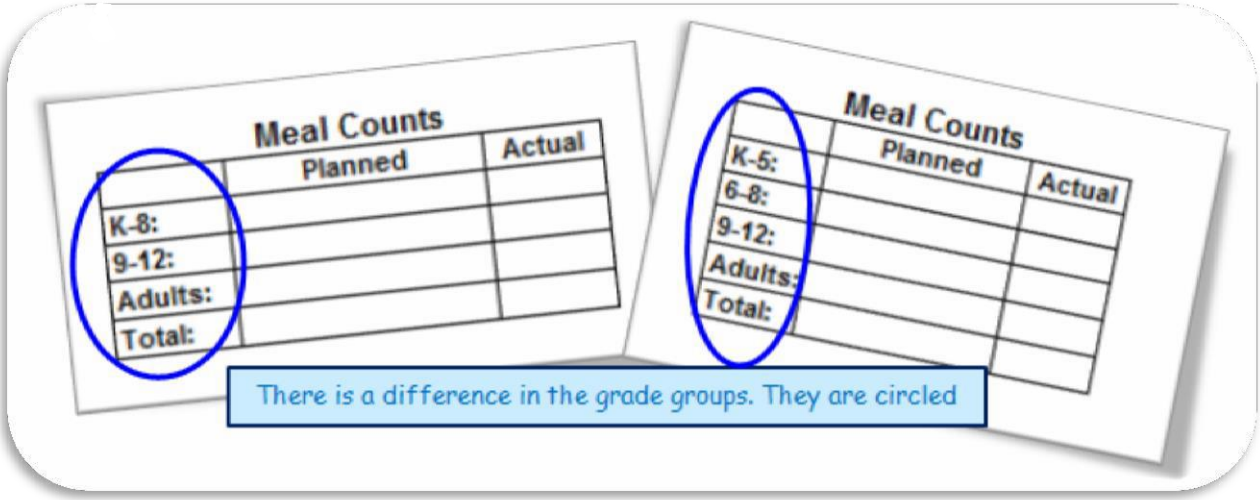
Line 7: Can students buy food items A la Carte? Here is where you tell us if they can or not.

Line 8: This line will ask if you offer free seconds. Check yes or no to answer whether or not you offer seconds.



All food offered for free must be included in your calorie, saturated fat, sodium, and Trans fat calculations. They also must meet the dietary specification requirements.

Now we can move to the meal counts area. They look like either of these:



Your meal count is how many meals you **plan** on serving, and how many meals you **actually** served.

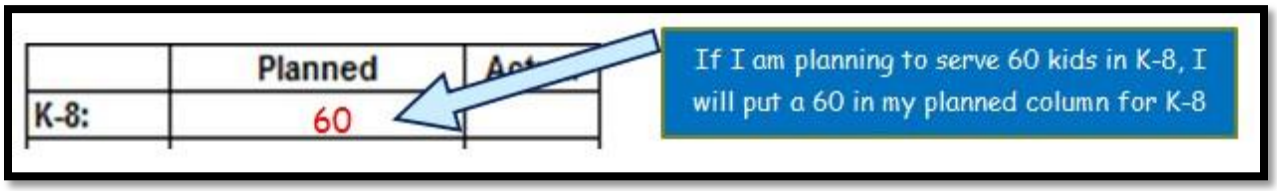
Planned meal counts may not necessarily match total planned servings from Column H.

Here is what your record will show if you serve in grade groups of K-8 and 9-12:

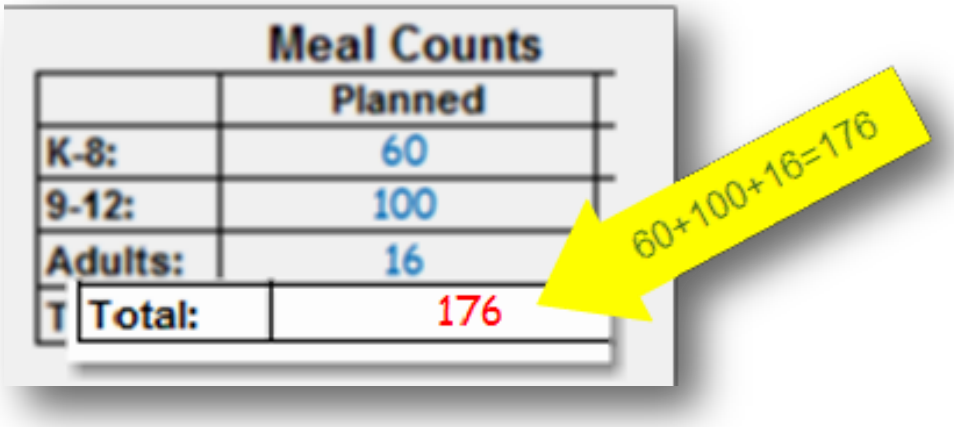
Meal Counts

	Planned	Actual
K-8:		
9-12:		
Adults:		
Total:		

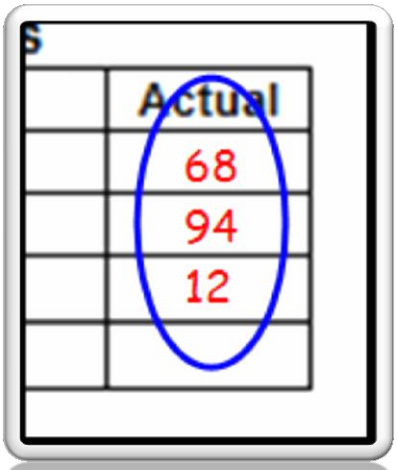
In the planned section, you should write the number of meals you plan on serving to that age group.



Repeat this process with your 9-12 kids and Adults.
To find your total number of planned meals, add all of your meal counts in the planned column together.



The 'Actual' column in your meal count is the number of meals that were actually served in those age groups when the meal was served. In this column, record the number of actual meals served. Do this for all age groups and Adults/A la Carte meals.



Now you will need to total them up, just like in the planned meals. Your finished meal count will look something like this:

Meal Counts

	Planned	Actual
K-8:	60	68
9-12:	100	94
Adults:	16	12
Total:	176	174

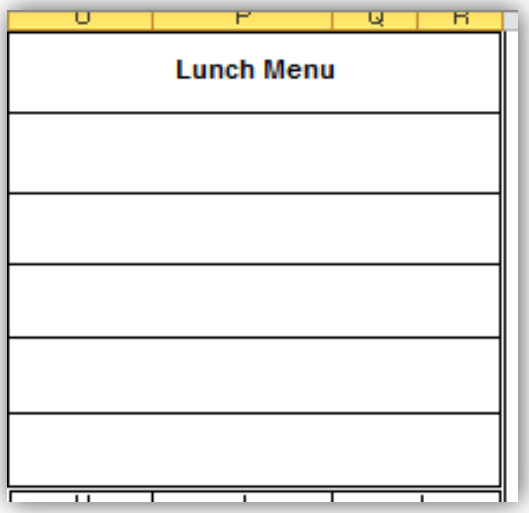
B. Serving Size and Lunch Menu

The next few lines are the serving size and lunch menu. The lunch menu section is where you will put what you are having for lunch. In the serving size section, you are going to put down how much of each food item you are planning to give each student of each age group.

Serving Size		Lunch Menu
K-8	9-12	
1 each	1 each	Hamburger on whole wheat bun
1/2 cup	1/2 cup	Baked Beans
3/4 cup	1 cup	Fresh broccoli florets
1/2 cup	1 cup	Pinapple chunks, canned
1 cup	1 cup	Milk Choice

These serving sizes must meet the minimum meal pattern requirements for a complete meal. DO NOT record the offer versus serve selection. This will get you into trouble, because it doesn't look like your meal meets minimum requirements!

We will start with the lunch menu, which looks like this:



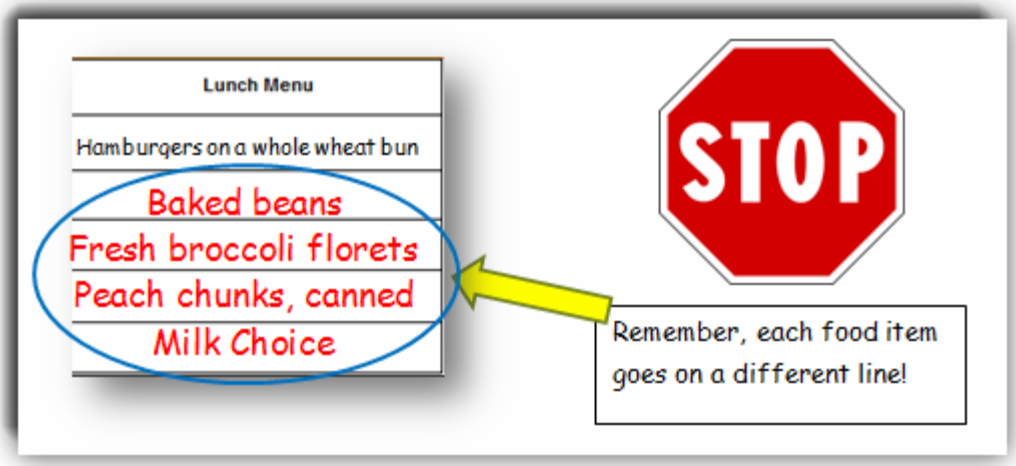
Your lunch menu is where you tell us all the foods you are going to serve for lunch.

Step 1: What entrée are you planning?

Put your entrée on the first line.

Step 2: What else are you having?

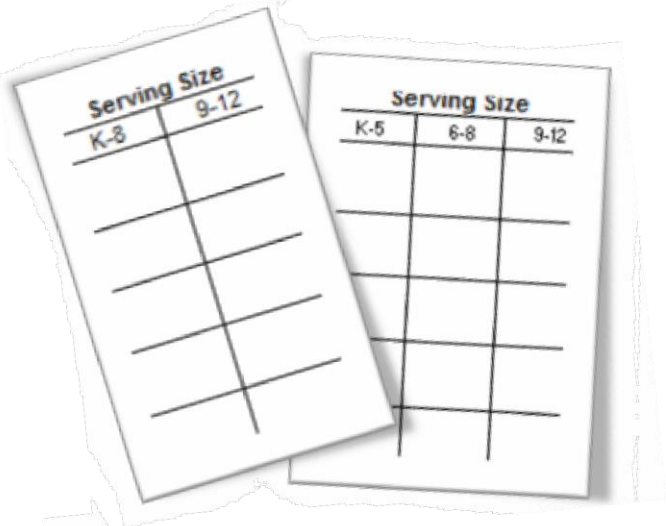
Put everything else you are serving on the next lines.



Try to describe the item with extra detail, like saying 'whole wheat bun'. That will help you fill out the rest!

Now on to the serving size.

Your serving size columns could look a little different, depending on your grade groups. Here are the ways it could look:



Here are the steps to fill out this portion:

Step 1: Look at what you wrote for menu items.

Step 2: Determine what age group you are going to complete first.

Step 3: Write down the serving sizes for each food item for this age group.

This is like your receipt for a complete meal, so be sure that what you record meets the minimum requirements for every component for each grade group.

Step 4: Record these on the record.

Step 5: Record the serving sizes for the rest of your age groups.

Serving Size	
K-8	9-12
1 each	
1/2 cup	
3/4 cup	
1/2 cup	
1 cup	

Congrats! You finished the top portion of your food production record! Now let's move on to the next part!!

C. Menu Item

In the Menu Item section, you are going to write down what you wrote on your lunch menu, but this section requires you to give the brand and product number, or recipe name and number of the component, too. And if you have space, add the Child Nutrition (CN) Label number or CN credit information.

This is what the menu item section looks like:

We will fill out the Menu Item section by filling each component out.

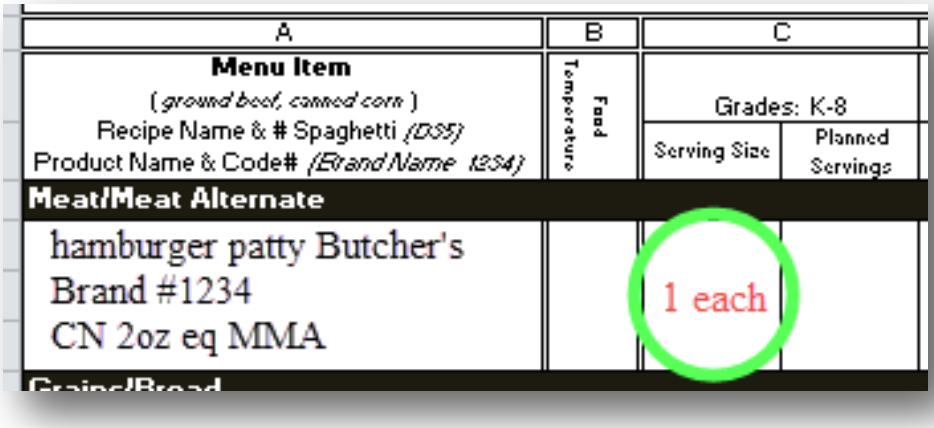
Meat/ Meat Alternate

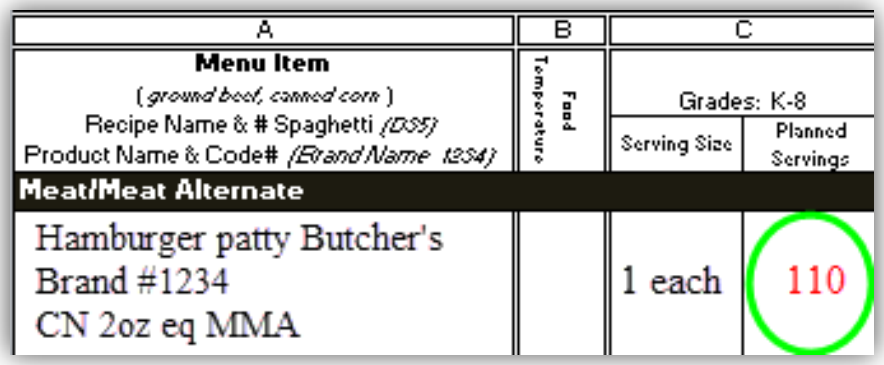
Step 1: You will need to put your entrée on this line.

Step 2: You will also need to put the brand name and number of the meat/ meat alternate ounce equivalents OR the meat weight in ounces/grams that you are serving.

Include the crediting for the Child Nutrition (CN) label too.

Step 3: Record the serving size for your first age group.





Step 4: Record the planned servings for that age group.

Step 5: Repeat steps 3 and 4 for the next grade groups.

A	B	C		D	
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12	
		Serving Size	Planned Servings	Serving Size	Planned Servings
Meat/Meat Alternate					
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170

Step 6: Record your serving size and planned servings for the planned seconds in each age group.

A	B	C		D		F	
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)	
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings
Meat/Meat Alternate							
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0

Because we answered no to seconds, we will leave this section

Step 7: Determine your serving size and planned servings for A la Carte and Adult meals.

A	B	C		D		F		G	
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(D35)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults	
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings
Meat/Meat Alternate									
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20

Step 8: Record your total planned servings.

Add your planned servings for each age group, your seconds, and a la Carte and Adult meals.

110+170+20=300

A	B	C		D		F		G		H
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	
Meat/Meat Alternate										
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300

Step 9: Record the total number of units that you prepared for the meal

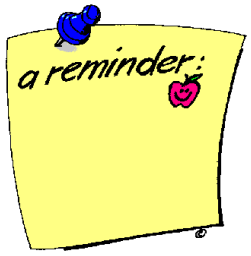
A	B	C		D		F		G		H	I
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings		
Meat/Meat Alternate											
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300	300

.

Total units may be different, based on the number of boxes, cans, pounds, or recipes of food to prepare.

Step 10: Record how many units of food you had to add to your meal, or how many you had leftover.

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(2355)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0		20	300	300	-5



Use a negative sign (-) if you had left over units
Use a positive sign (+) if you had to add more units

You are finished with the Meat/Meat Alternate section!

Grains/Bread

Step 1: You will need to put all of the grains that you are serving on this line.

Step 2: You will also need to put the brand name, number of the grains, and weight of the grains that you are serving on this line.

Include the ounce equivalent for crediting for Child Nutrition too!

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name ISM)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300	300	-5
Grains/Bread												
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand												

Step 3:

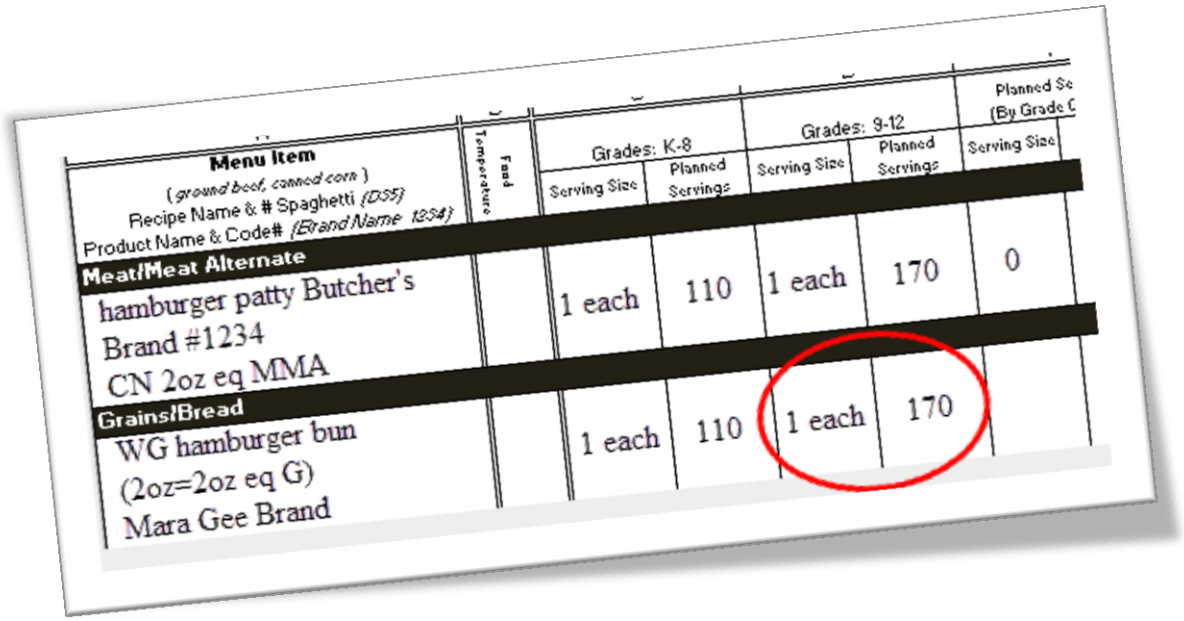
Record the serving size for your first age group.

Step 4:

Record the planned servings for that age group.

A	B	C		D		F
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name ISM)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned S (By Grade
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size
Meat/Meat Alternate						
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0
Grains/Bread						
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand		1 each	110			

Step 5: Repeat steps 3 and 4 for the next grade groups.



Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (DS5) Product Name & Code# (Brand Name 1234)	Temperature	Food	Grades: K-8 Serving Size	Grades: K-8 Planned Servings	Grades: 9-12 Serving Size	Grades: 9-12 Planned Servings	Planned Se (By Grade G Serving Size
Meat/Meat Alternate							
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA			1 each	110	1 each	170	0
Grains/Bread							
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand			1 each	110	1 each	170	

Step 6: Record your serving size and planned servings for the planned seconds in each age group.

A	B	C		D		F		G	
Menu Item (ground beef, canned corn) Recipe Name & # Spaghetti (DS5) Product Name & Code# (Brand Name 1234)	Temperature / Food	Grades: K-8 Serving Size	Grades: K-8 Planned Servings	Grades: 8-12 Serving Size	Grades: 8-12 Planned Servings	Planned Seconds (By Grade Groups) Serving Size	Planned Seconds (By Grade Groups) Planned Servings	A la Carte, Adults Serving Size	A la Carte, Adults Planned Servings
Meat/Meat Alternate									
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20
Grains/Bread									
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand		1 each	110	1 each	170	0	0		

Step 7: Determine your serving size and planned servings for A la Carte or Adult meals.

A	B	C		D		F		G		H	I
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings		
Meat/Meat Alternate											
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300	300
Grains/Bread											
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand		1 each	110	1 each	170	0	0	1 each	20		

Step 8: Record your total planned servings.

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name 1234)*	Food Temperature	Grades: K-8		Grades: 9-12		Planned Seconds (By Grade Groups)		A la Carte, Adults		Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
		Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings	Serving Size	Planned Servings			
Meat/Meat Alternate												
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300	300	-5
Grains/Bread												
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand		1 each	110	1 each	170	0	0	1 each	20	300		

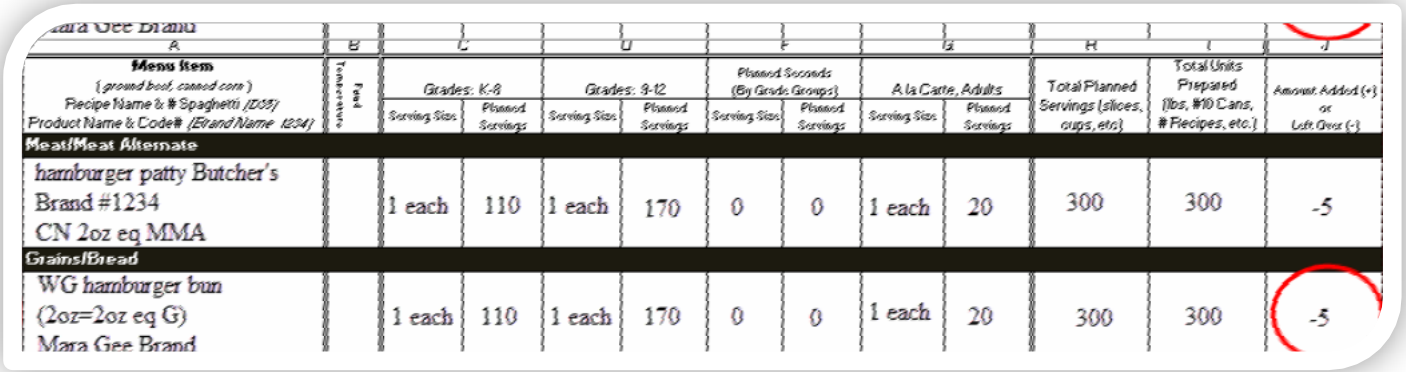
Add your planned servings for each age group, your seconds, and a la Carte and Adult meals together.

Step 9: Record the total number of units that you prepared for the meal.

A	B	C		D		F		G		H	I	J
Menu Item (*ground beef, canned corn*) Recipe Name & # Spaghetti *(DSS)* Product Name & Code# *(Brand Name 1234)*	Temperature / Food	Grades: K-8 Serving Size	Grades: K-8 Planned Servings	Grades: 9-12 Serving Size	Grades: 9-12 Planned Servings	Planned Seconds (By Grade Groups) Serving Size	Planned Seconds (By Grade Groups) Planned Servings	A la Carte, Adults Serving Size	A la Carte, Adults Planned Servings	Total Planned Servings (slices, cups, etc)	Total Units Prepared (lbs, #10 Cans, # Recipes, etc.)	Amount Added (+) or Left Over (-)
Meat/Meat Alternate												
hamburger patty Butcher's Brand #1234 CN 2oz eq MMA		1 each	110	1 each	170	0	0	1 each	20	300	300	-5
Grains/Bread												
WG hamburger bun (2oz=2oz eq G) Mara Gee Brand		1 each	110	1 each	170	0	0	1 each	20	300	300	

Total units may be different, based on the number of units per bag, box, etc.

Step 10: Record how many units of food you had to add to your meal, or how many you had leftover.

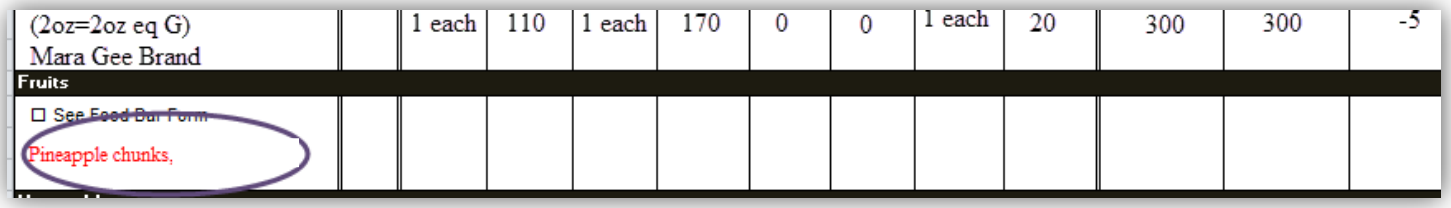


Use a negative sign (-) if you had left over units
Use a positive sign (+) if you had to add more units

You are finished with the Grains/Bread section!

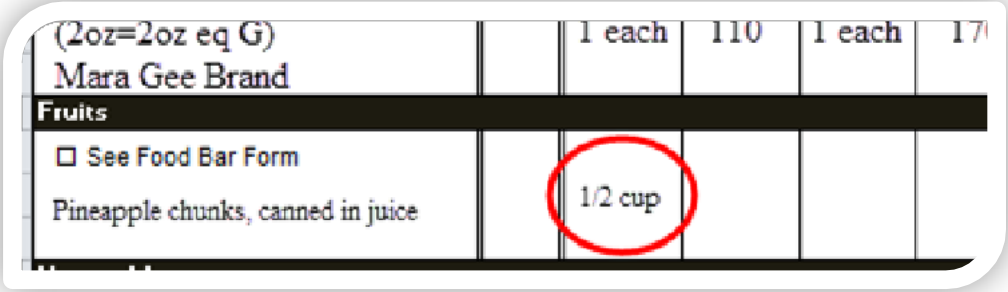
Fruits

Step 1: You will need to put all of the fruits that you are serving on this line.

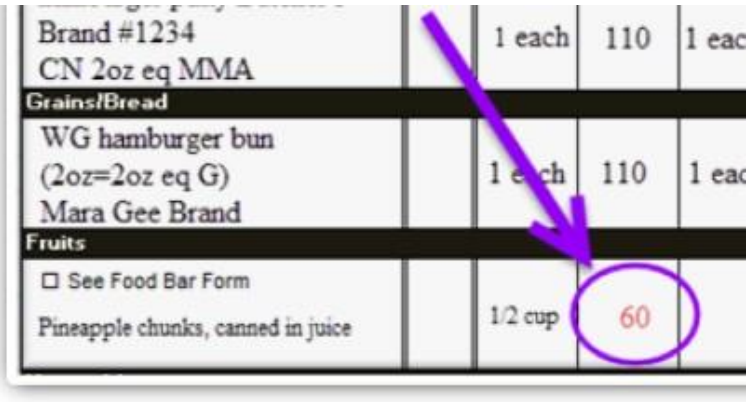


Step 2: You will also need to record the fruit as purchased or how you are serving it (cooked, steamed, drained, etc.).

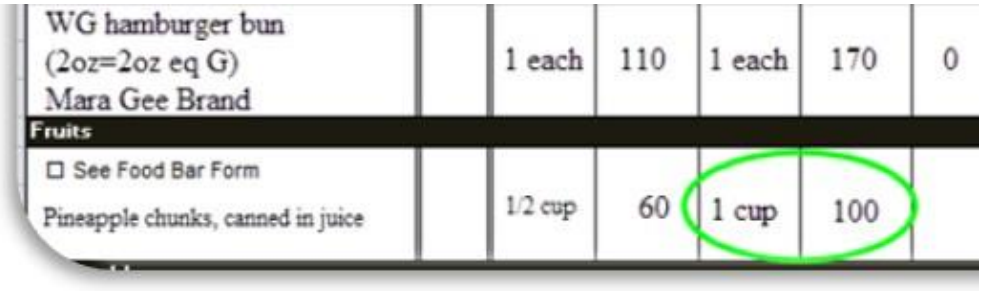
Step 3: Record the serving size for your first age group.



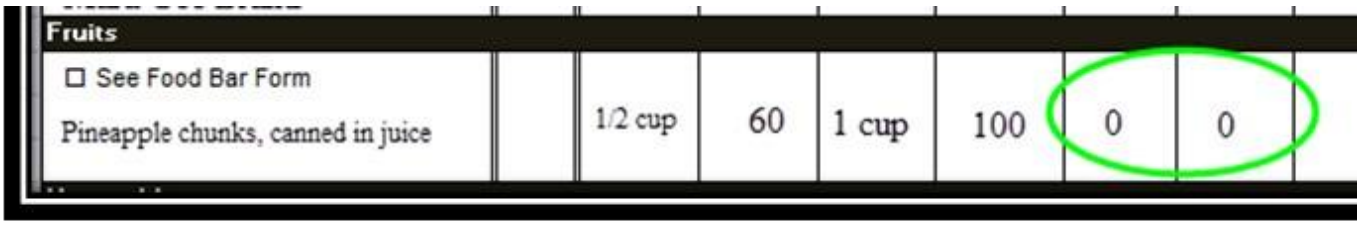
Step 4: Record the planned servings for that age group.



Step 5: Repeat steps 3 and 4 for the next grade groups.



Step 6: Record your serving size and planned servings for the planned seconds.



Step 7: Determine your serving size and planned servings for A la Carte or Adult meals.

Mara Gee Brand									
Fruits									
☐ See Food Bar Form Pineapple chunks, canned in juice		1/2 cup	60	1 cup	100	0	0	1 cup	20

The rows for the rest of the menu items are a little trickier than the rows for the other menu items. But you can do it! Follow the directions and tips carefully.

Step 8: Record your total planned servings.

We will want the end result to look like this and only have one serving size.

Mara Gee Brand										
Fruits										
☐ See Food Bar Form Pineapple chunks, canned in juice		1/2 cup	60	1 cup	100	0	0	1 cup	20	150 cups

We need to do a little more math to get that answer.

- We need to figure out how many total cups there are if some students get ½ cup and some students and adults get 1 cup.

To start we know there are two 1/2 cup servings in a cup.

In order to convert half cups to full cups, we need to take the number of servings X the serving size. (To make it easier, we will use decimals instead of fractions.)

1/2 cup = .50 cups

60 (servings) X .50 (serving size)= 30 full cups

Save this number because you will use it for your first age group in your total planned servings

There is also a conversion chart for you to look at in Appendix E.

- Now we need to find the cups for the next age group

This example says that the students in this age group are given a full cup for a serving size. That means that we already know how many cups were planned:

100 (servings) X 1 (serving size) = 100 full cups

Save this number because you will use it for your next age group in your total planned servings

- Do this with all age groups

- Now include the seconds

In this example, free seconds are not served, so we have nothing to calculate

- Next are the a la carte or adult meals

ed in juice		1/2 cup	60	1 cup	100	0	0	1 cup	20

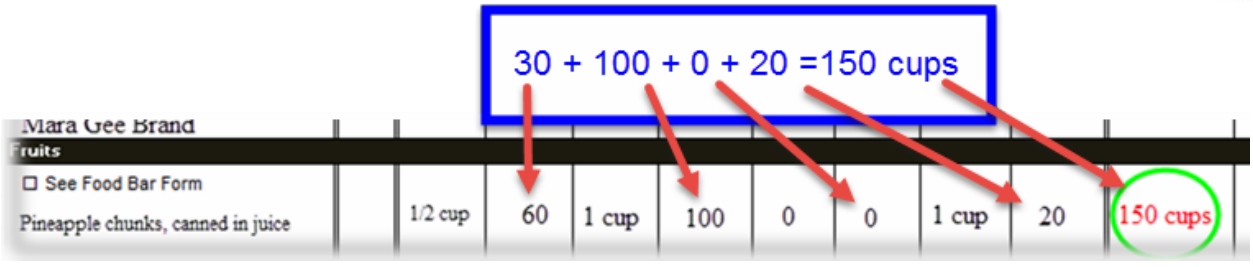
This example says that the Adult/A la Carte serving size is 1 cup. That means that we already know how many cups were planned:

20 (servings) X 1 (serving size) = 20 full cups

Save this number because you will use it for your a la carte and adult meal in your total planned servings

Sweet! You can now add together all of the **FULL CUPS** that you just found and put them in your total planned servings column.

30+100+0+20= 150 cups

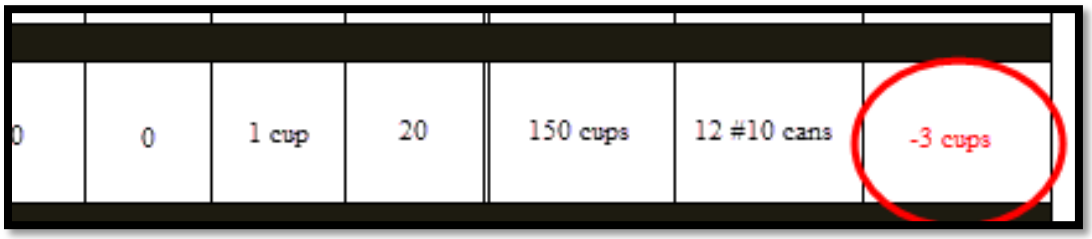


Step 9: Record the total number of units that you prepared for the meal.

In this example, there were 12 #10 cans prepared for the pineapple chunks.

When you are finding how many units you prepared for your meal, the math you do will depend on what your menu item is. You can find the measurement by using the food buying guide in Appendix B.

Step 10: Record how many units of food you had to add to your meal, or how many you had leftover.

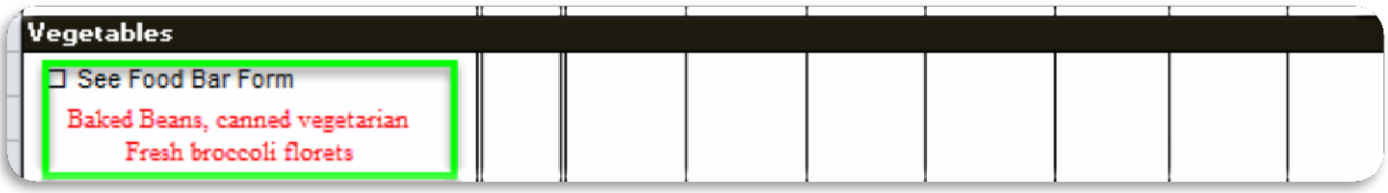


Use a negative sign (-) if you had left over food units
Use a positive sign (+) if you had to add more food units

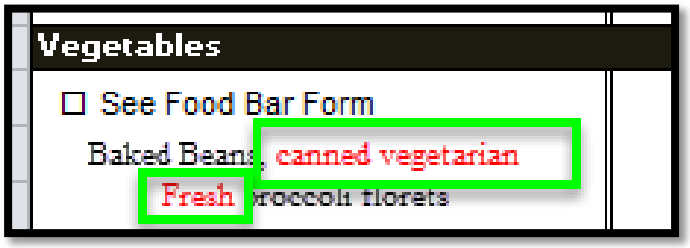
You are finished with the Fruit section!

Vegetables

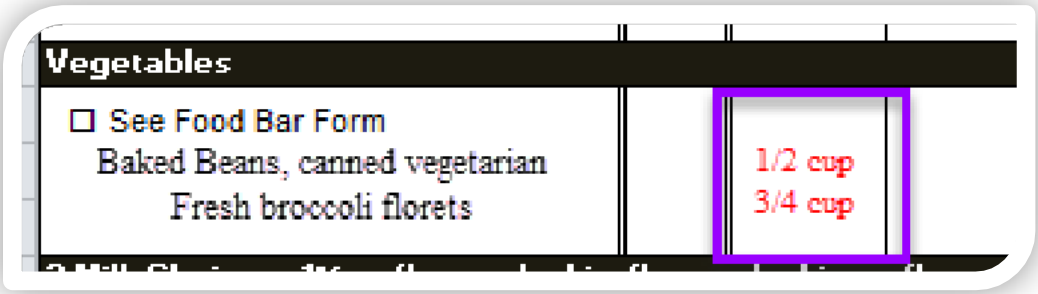
Step 1: You will need to put all of the vegetables that you are serving on this line.



Step 2: You will also need to record the vegetables as purchased or prepared. Add any product information if you are using a specific brand.

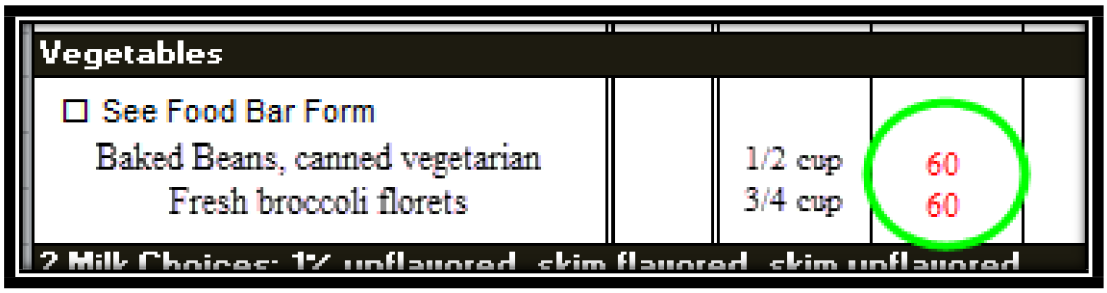


Step 3: Record the serving size(s) for your first age group.



Each vegetable needs to go on its own line!!

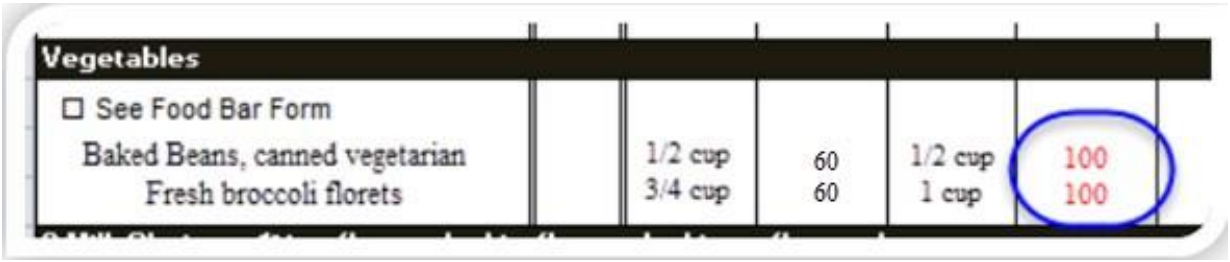
Step 4: Record the planned servings for that age group.



Vegetables			
☐ See Food Bar Form			
Baked Beans, canned vegetarian		1/2 cup	60
Fresh broccoli florets		3/4 cup	60

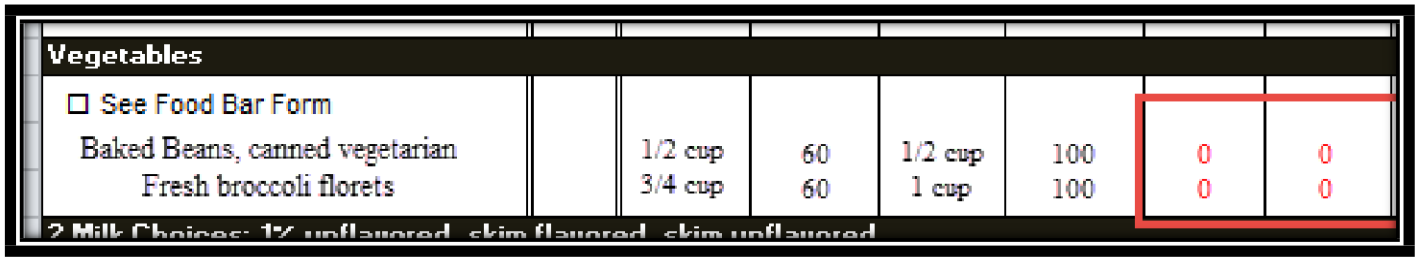
2 Milk Choices: 1% unflavored skim flavored skim unflavored

Step 5: Repeat steps 3 and 4 for the next grade groups.



Vegetables						
☐ See Food Bar Form						
Baked Beans, canned vegetarian		1/2 cup	60	1/2 cup	100	
Fresh broccoli florets		3/4 cup	60	1 cup	100	

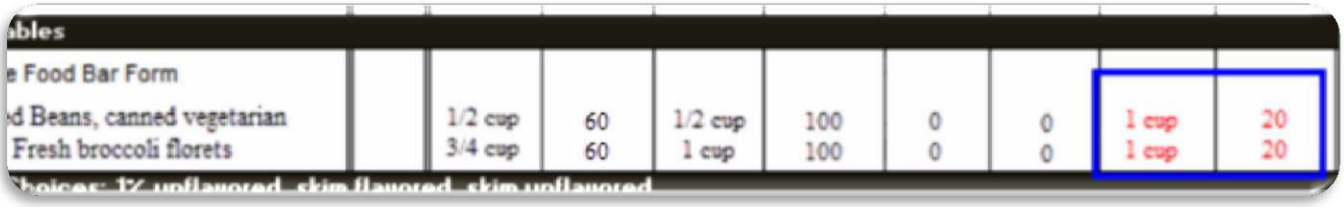
Step 6: Record your serving size and planned servings for the planned seconds in each age group.



Vegetables							
☐ See Food Bar Form							
Baked Beans, canned vegetarian		1/2 cup	60	1/2 cup	100	0	0
Fresh broccoli florets		3/4 cup	60	1 cup	100	0	0

2 Milk Choices: 1% unflavored skim flavored skim unflavored

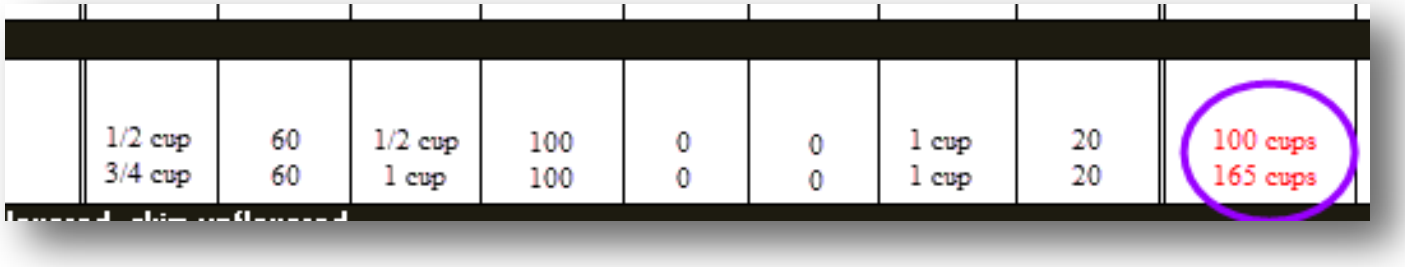
Step 7: Determine your serving size and planned servings for A la Carte or Adult meals.



ables									
e Food Bar Form									
d Beans, canned vegetarian		1/2 cup	60	1/2 cup	100	0	0	1 cup	20
Fresh broccoli florets		3/4 cup	60	1 cup	100	0	0	1 cup	20
hoices: 1% unflavored, skim flavored, skim unflavored									

Step 8: Record your total planned servings.

The end result should look like this:



	1/2 cup	60	1/2 cup	100	0	0	1 cup	20	100 cups
	3/4 cup	60	1 cup	100	0	0	1 cup	20	165 cups
lavored, skim unflavored									

We need to do a little more math to get that answer.

- We need to figure out how many total cups there are if each student gets ½ cup and you serve 60 students.

In order to convert half cups to full cups, we need to take the number of servings X the serving size. (To make it easier, we will use decimals instead of fractions.)

For the first example vegetable (beans)

1/2 cup = .50 cups

60 (servings) X .50 (serving size)= 30 full cups

For the next example vegetable (broccoli)

3/4 cup = .75 cups

60 (servings) X .75 (serving size)= 45 full cups

Save these numbers because you will use it for your first age group in your total planned servings

- Now we need to find the cups for the next age group

This example says that the students in this age group are given a 1/2 cup of beans and 1 cup of broccoli for a serving size. Let's convert to cups:

For the first example vegetable (beans)

1/2 cup = .50 cups

100 (servings) X .50 (serving size)= 50 full cups

For the next example vegetable (broccoli)

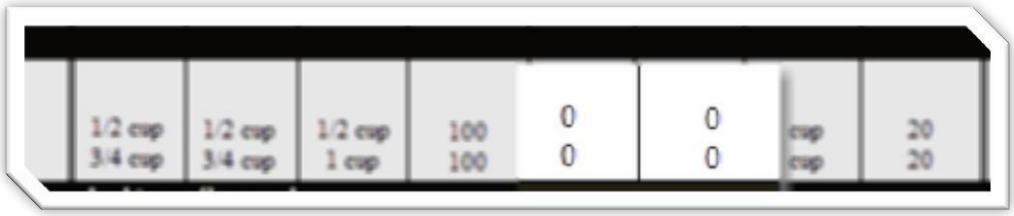
100 (servings) X 1 (serving size)= 100 full cups

Save these numbers because you will use them for your next age group in your total planned servings

- Do this with all age groups

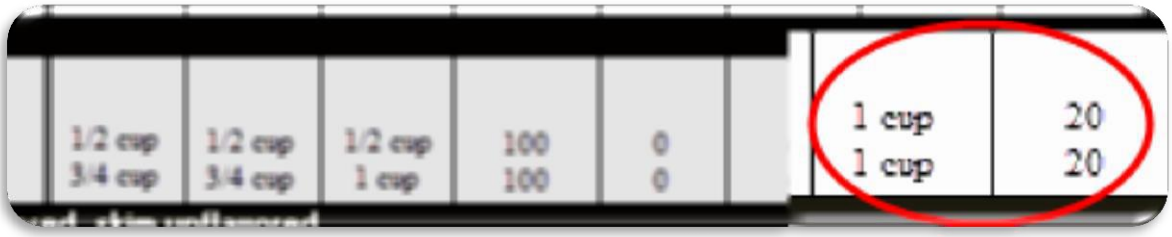
- Now include the seconds

In this example, free seconds are not served, so we have nothing to calculate.



1/2 cup 3/4 cup	1/2 cup 3/4 cup	1/2 cup 1 cup	100 100	0 0	0 0	cup cup	20 20

- Next are the a la carte or adult meals



1/2 cup 3/4 cup	1/2 cup 3/4 cup	1/2 cup 1 cup	100 100	0 0		1 cup 1 cup	20 20

This example says that the Adults/A la Carte serving size is 1 cup. That means that we already know how many cups were planned:

20 (servings) X 1 (serving size) = 20 full cups

Save this number because you will use it for your a la carte and adult meal in your total planned servings

Sweet! You can now add together all of the **FULL CUPS** that you just found and put them in your total planned servings column.

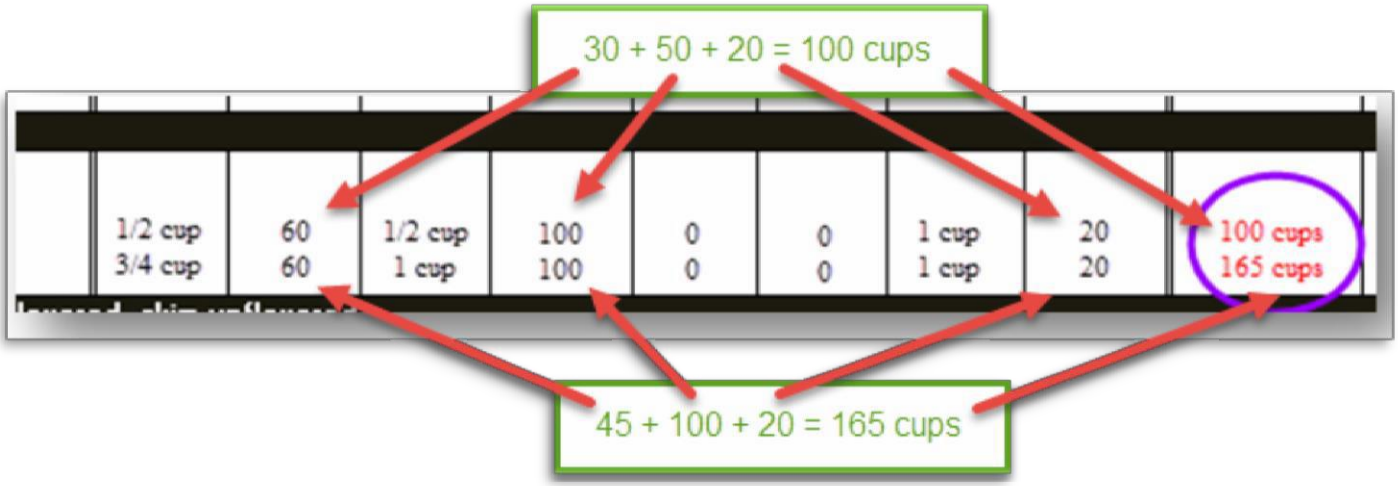
Each vegetable's numbers need to be on their own line

For the first example vegetable (beans)

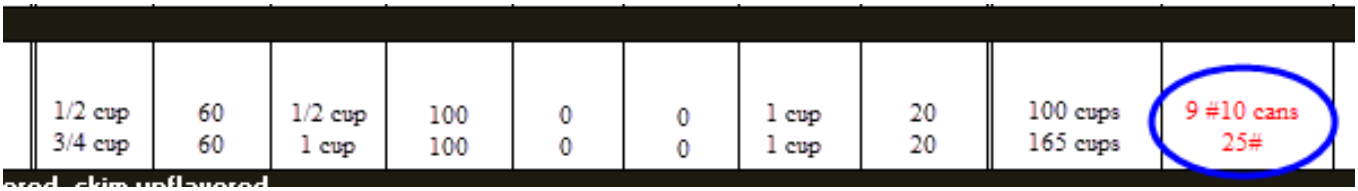
30+50+20= 100 cups

For the next example vegetable (broccoli)

45+100+20= 165 cups



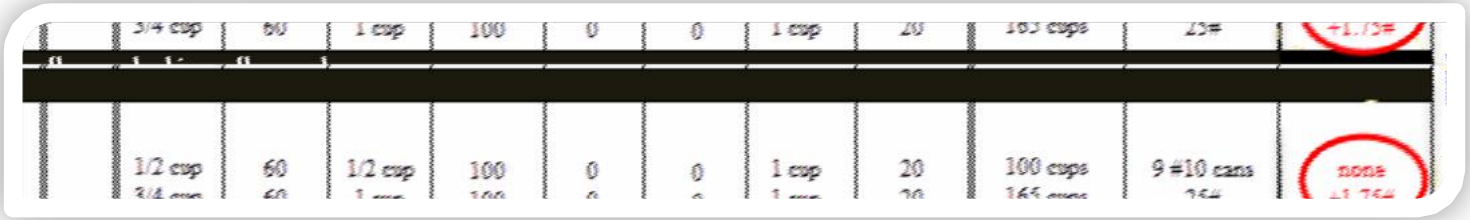
Step 9: Record the total number of units that you prepared for the meal.



In this example, there were 9 #10 cans prepared for the baked beans and 25 pounds of broccoli florets prepared for the day.

When you are finding how many units you prepared for your meal, the math you do will depend on what your menu item is. You can find the measurement by using the food buying guide in Appendix G.

Step 10: Record how many units of food you had to add to your meal, or how many you had leftover.



1/2 cup	60	1/2 cup	100	0	0	1 cup	20	100 cups	9 #10 cans	none

Use a negative sign (-) if you had left over food units
Use a positive sign (+) if you had to add more food units

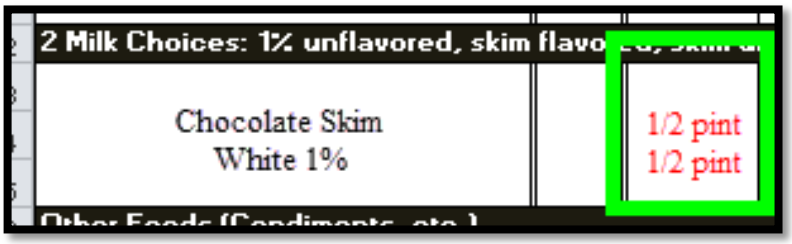
You are finished with the Vegetable section!

Milk Choices

Step 1: You will need to put all of the milk that you are serving on this line.

Don't forget to include the type of milk you are serving! Each different milk variety (skim plain, skim chocolate, 1%) must be recorded on its own line.

Step 2: Record the serving size for your first age group.



Step 3: Record the planned servings for that age group.

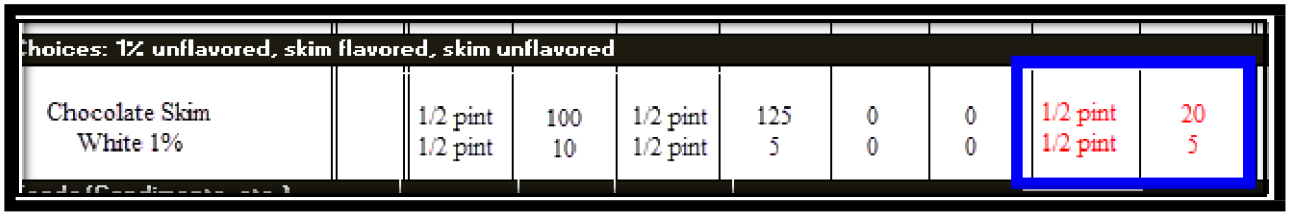
Step 4: Repeat steps 3 and 4 for the next grade groups.

2 Milk Choices: 1% unflavored, skim flavored, skim unflavored					
Chocolate Skim White 1%		1/2 pint 1/2 pint	100 10	1/2 pint 1/2 pint	125 5

Step 5: Record your serving size and planned servings for the planned seconds in each age group.

oices: 1% unflavored, skim flavored, skim unflavored							
Chocolate Skim White 1%		1/2 pint 1/2 pint	100 10	1/2 pint 1/2 pint	125 5	0 0	0 0

Step 6: Determine your serving size and planned servings for A la Carte or Adult meals.

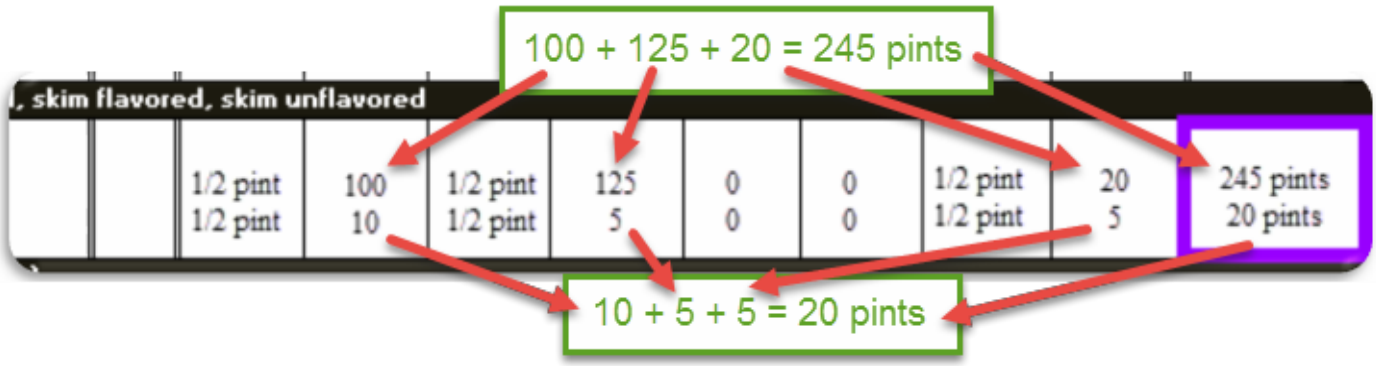


hoices: 1% unflavored, skim flavored, skim unflavored									
Chocolate Skim White 1%		1/2 pint 1/2 pint	100 10	1/2 pint 1/2 pint	125 5	0 0	0 0	1/2 pint 1/2 pint	20 5

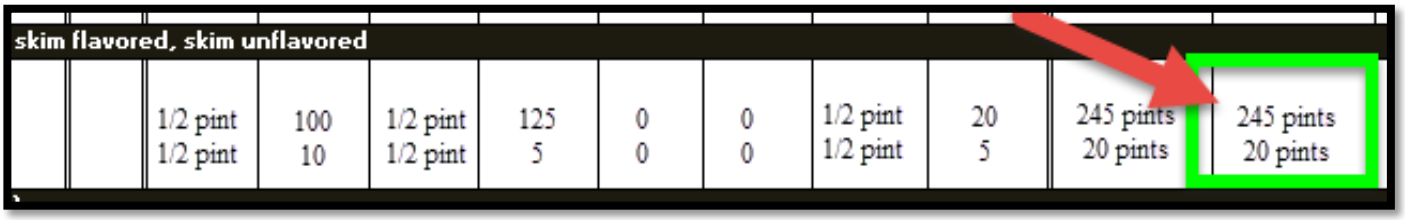
Step 7: Record your total planned servings.

Since most milk is served in pints, we do not have to do any hard math to find the total planned servings. Add your total planned servings for each age group, your seconds, and a la Carte and Adult meals.

For the first kind of milk
100 + 125 + 20 = 245 pints
For the next kind of milk
10 + 5 + 5 = 20 pints



Step 8: Record the total number of units that you prepared for the meal.



You can use a good estimate for total milks prepared. For 1 or 2 weeks, take the actual counts of each kind of milk selected by students and adults. You can use those as your planned numbers. If your milk usage changes, be sure to repeat the count to get a new estimate.

Step 9: Record how many units of milk you had to add toyour meal, or how many you had leftover.

ed, skim unflavored										
1/2 pint 1/2 pint	100 10	1/2 pint 1/2 pint	125 5	0 0	0 0	1/2 pint 1/2 pint	20 5	245 pints 20 pints	245 pints 20 pints	-5 -1

You are finished with the Milk section!

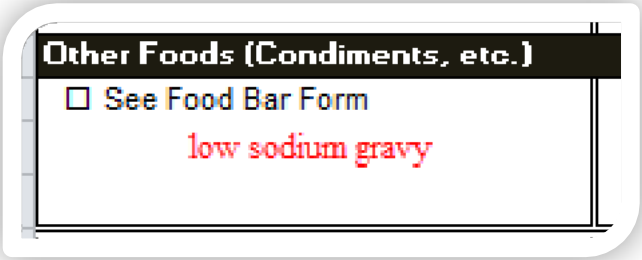
Other Food Items

The Other Food Items section is the place where you will put things like gravy, cheese sauces, ice cream bars, or any additional items that do not credit toward the meal pattern requirements.

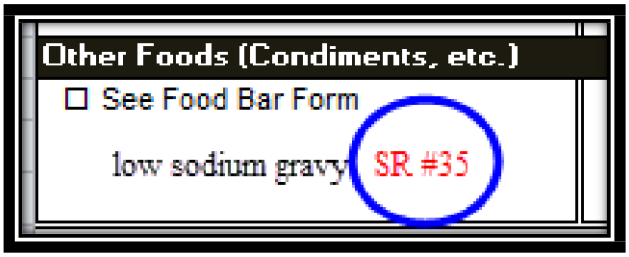
For an example, we will use low sodium gravy.

Other Foods (Condiments, etc.)												
☐ See Food Bar Form												

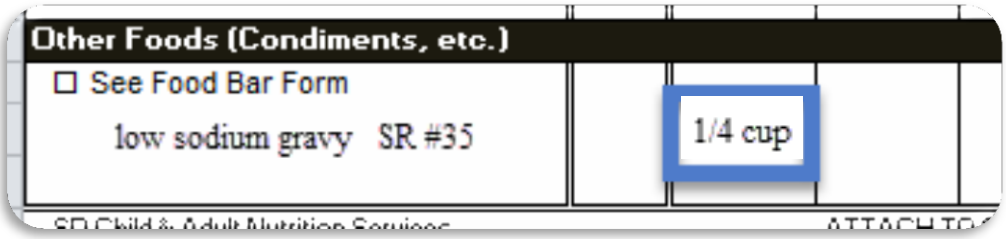
Step 1: You will need to put all of the extra food that you are serving on this line.



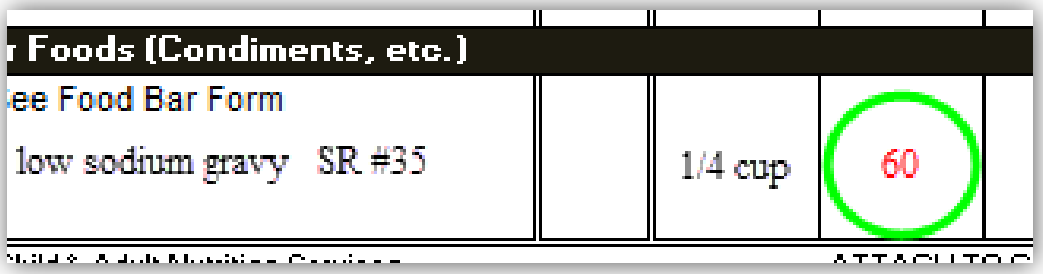
Step 2: You will also need to put the recipe name and number or brand name and number.



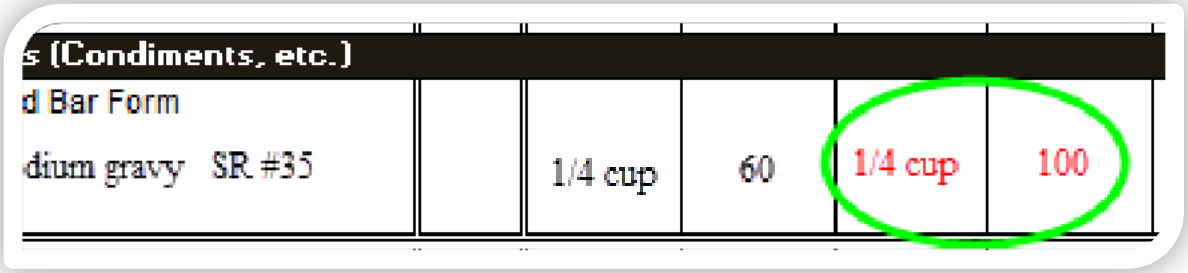
Step 3: Record the serving size for your first age group.



Step 4: Record the planned servings for that age group.

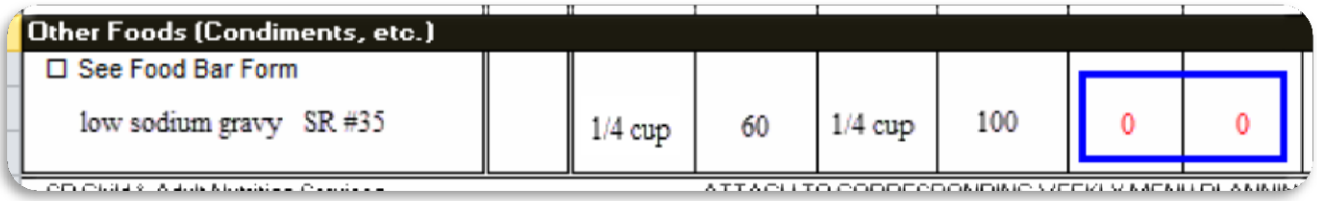


Step 5: Repeat steps 3 and 4 for the next grade groups.



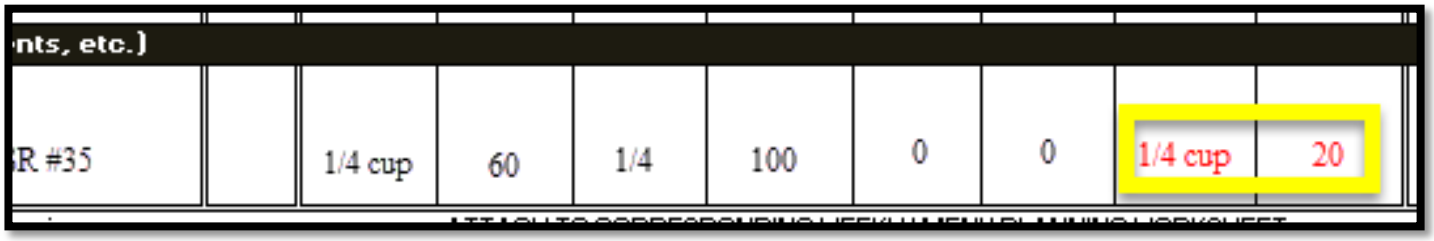
s (Condiments, etc.)					
d Bar Form					
dium gravy SR #35		1/4 cup	60	1/4 cup	100

Step 6: Record your serving size and planned servings for the planned seconds in each age group.



Other Foods (Condiments, etc.)							
☐ See Food Bar Form							
low sodium gravy SR #35		1/4 cup	60	1/4 cup	100	0	0

Step 7: Determine your serving size and planned servings for A la Carte or Adult meals.



nts, etc.)									
R #35		1/4 cup	60	1/4	100	0	0	1/4 cup	20

Step 8: Record your total planned servings.

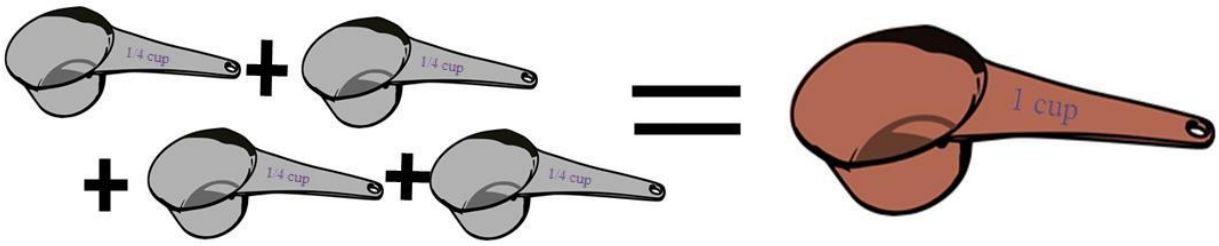
We will want the end result to look like this:

1/4 cup	60	1/4	100	0	0	1/4 cup	20	45 cups

But we may need to do a little more math to get that answer.

- We need to figure out how many total cups there are if each student gets 1/4 cup of gravy and you serve 60 students.

There are **four** 1/4 cup servings in a cup.



In order to convert quarter cups to full cups, we need to take the number of servings X the serving size. (To make it easier, we will use decimals instead of fractions.)

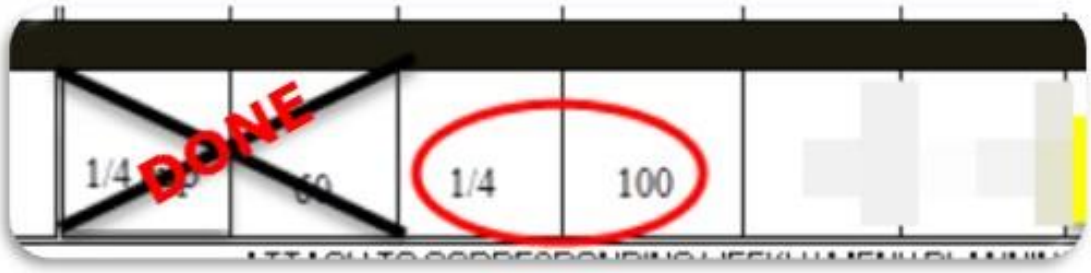
1/4 cup = .25 cups

60 (servings) X .25 (serving size)= 15 full cups

Save this number because you will use it for your first age group in your total planned servings

There is also a conversion chart for you to look at in Appendix E, at the back of your handbook.

- Now we need to find the cups for the next age group



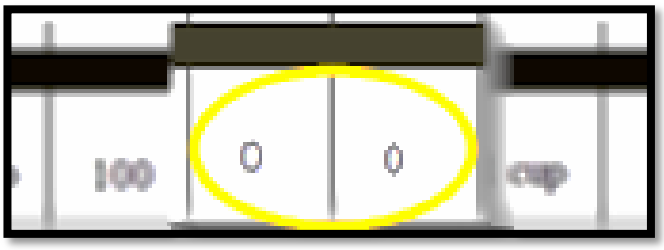
100 (servings) X .25 (serving size) = 25 full cups

Save this number because you will use it for your next age group in your total planned servings

- Do this with all age groups

- Now include the seconds

In this example, free seconds are not served, so we have nothing to calculate



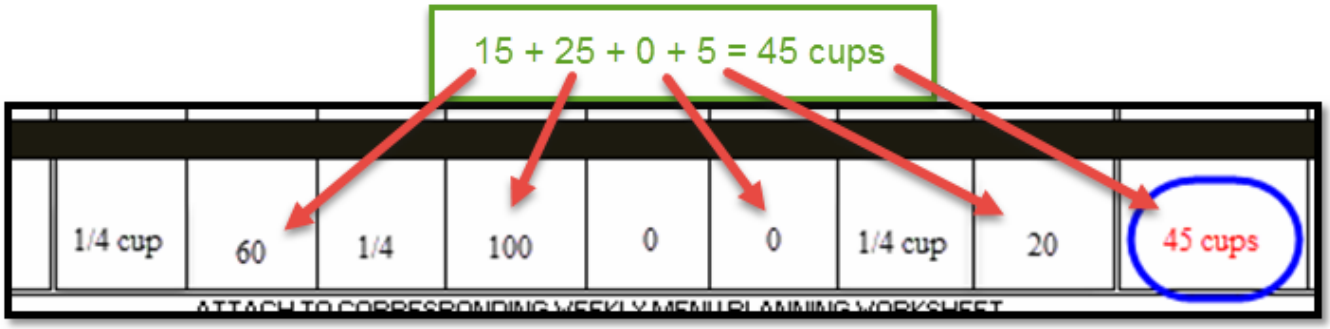
- Next are the a la carte or adult meals

20 (servings) X .25 (serving size) = 5 full cups

Save this number because you will use it for your a la carte and adult meal in your total planned servings

Sweet! You can now add together all of the **FULL CUPS** that you just found and put them in your total planned servings column.

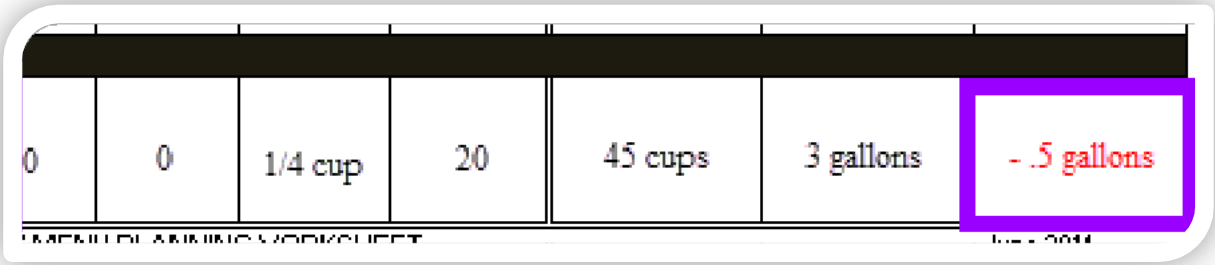
15 + 25 + 0 + 5 = 45 cups



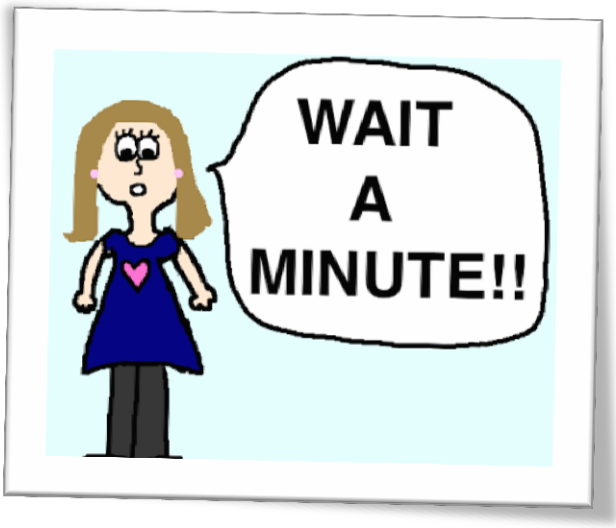
Step 9: Use your recipe to help you record the total number amount you prepared.

There is a chart for some common conversions in Appendix E. This can help you get a good measurement to give you an idea of how much you should prepare.

Step 10: Record how many units of food you had to add to your meal, or how many you had leftover.



You are finished with the Other Foods section!

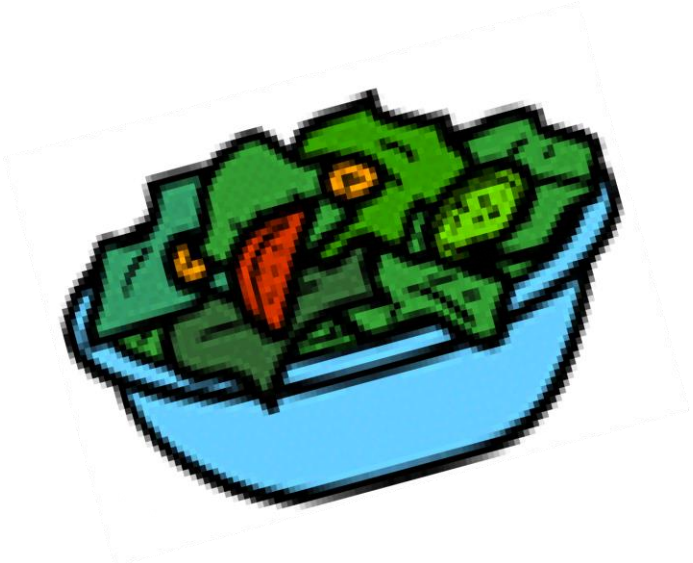


On the production record, you probably noticed the checkbox for the 'See Food Bar Form' in the fruit, vegetable, and Other Foods sections. That checkbox is for the Food Bar form.

Chapter 4- The Food Bar Form

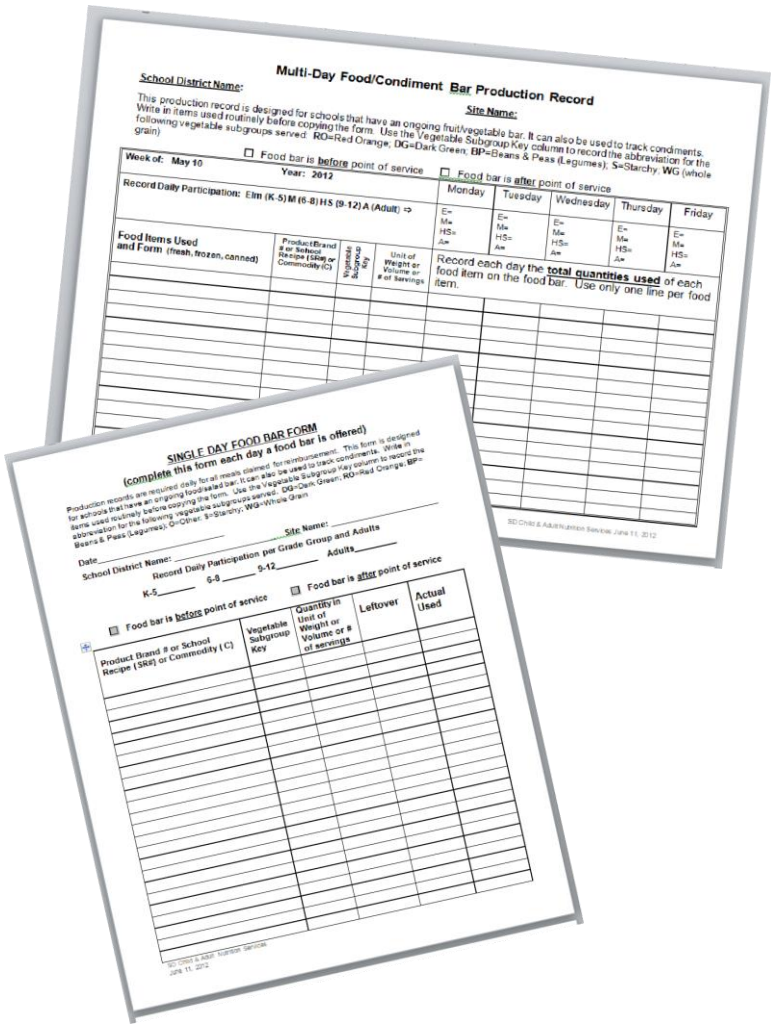
The Food Bar Form looks a lot like the Food Production Record. Make sure not to confuse them, because they are used for different things.

The Food Bar Form is a worksheet where you write down all of the things you have on your fruit or vegetable bar. This is also used when you have the same condiments on your bar. The food bar will ask you to include the following things:



-Week, Month, and Year of participation
- Location of food bar (before or after point of service)

-How many people in each age group you served each day
-The food items you served and the form you served them in (fresh, frozen, canned)
-Either product brand number, school recipe, or commodity
-The vegetable subgroup
-Weight, volume, or number of servings.
-Total quantity of each food item on the list that was served that day


Multi-Day Food/Condiment Bar Production Record

School District Name:

Site Name:

This production record is designed for schools that have an ongoing fruit/vegetable bar. It can also be used to track condiments. Write in items used routinely before copying the form. Use the Vegetable Subgroup Key column to record the abbreviation for the following vegetable subgroups served: RO=Red Orange; DG=Dark Green; BP=Beans & Peas (Legumes); S=Starchy; WG (whole grain)

Week of: May 10 Year: 2012

☐ Food bar is before point of service ☐ Food bar is after point of service

Record Daily Participation: Elm (K-5) M (6-8) HS (9-12) A (Adult) ⇨

	Monday	Tuesday	Wednesday	Thursday	Friday
	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=

Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings

Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.

SINGLE DAY FOOD BAR FORM

(complete this form each day a food bar is offered)

Production records are required daily for all meals claimed for reimbursement. This form is designed for schools that have an ongoing food/salad bar. It can also be used to track condiments. Write in items used routinely before copying the form. Use the Vegetable Subgroup Key column to record the abbreviation for the following vegetable subgroups served: DG=Dark Green; RO=Red Orange; BP=Beans & Peas (Legumes); O=Other; S=Starchy; WG=Whole Grain

Date_____ Site Name:_____

School District Name:_____ Record Daily Participation per Grade Group and Adults

K-5_____ 6-8_____ 9-12_____ Adults_____

☐ Food bar is before point of service ☐ Food bar is after point of service

Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key	Quantity in Unit of Weight or Volume or # of servings	Leftover	Actual Used

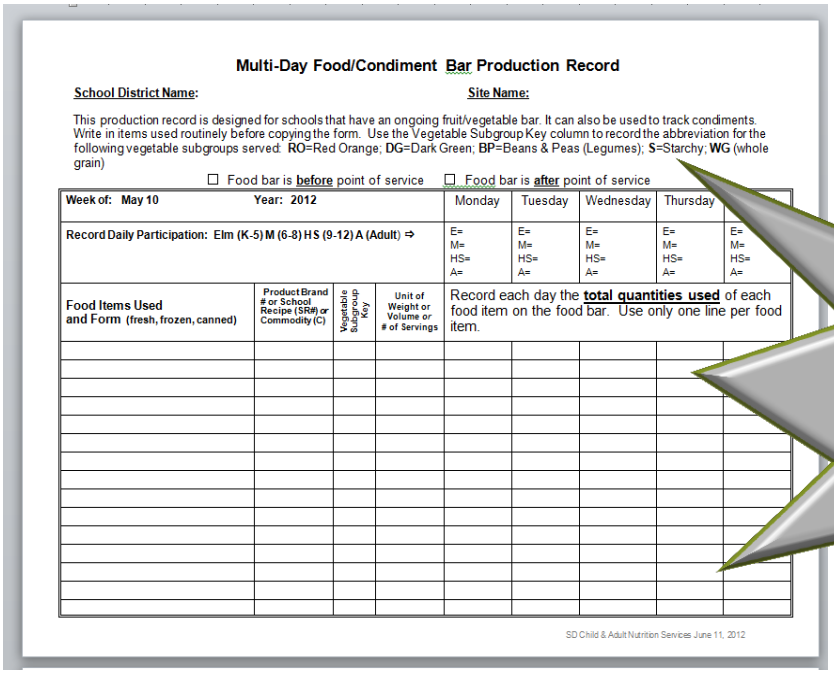
SD Child & Adult Nutrition Services June 11, 2012

You might not need a Food Bar Form, but if you are one of those that do, we can fill it out together.

There are two Food Bar Forms: a multi-day, and a daily. You can find the food bar forms on our website: http://doe.sd.gov/cans/nslp.aspx

Under *Menu Planning*

We will provide an example for using the Multi-Day Food Bar Form.



Multi-Day Food/Condiment Bar Production Record

School District Name: **Site Name:**

This production record is designed for schools that have an ongoing fruit/vegetable bar. It can also be used to track condiments. Write in items used routinely before copying the form. Use the Vegetable Subgroup Key column to record the abbreviation for the following vegetable subgroups served: **RO**=Red Orange; **DG**=Dark Green; **BP**=Beans & Peas (Legumes); **S**=Starchy; **WG** (whole grain)

☐ Food bar is **before** point of service ☐ Food bar is **after** point of service

Week of: May 10 **Year: 2012**				Monday	Tuesday	Wednesday	Thursday	
Record Daily Participation: Elm (K-5) M (6-8) HS (9-12) A (Adult) ⇨				E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=
Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings	Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.				

SD Child & Adult Nutrition Services June 11, 2012

If you have a food bar every day, it might be easiest for you to fill out the weekly form, but the choice is yours

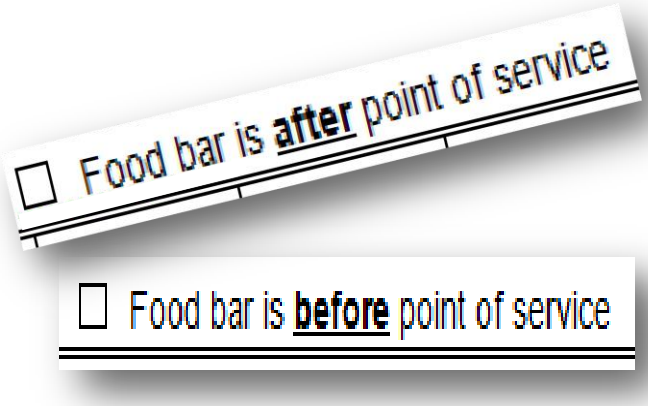
The first portion of the food bar form asks for your school information.

School District Name: **Site Name:**

Put your school information on these lines

School District Name: ABC School District **Site Name:** A Middle School

Is the food bar located before the point of service (meal counter person) or after?
In other words, do the kids go to the salad bar before the meal count (before point of service), or do they go through the salad bar after the meal count (after point of service)?



Check the box that applies to your lunch room.

*If your food bar is after the point of service, please visit with a CANS specialist. Your salad bar foods **cannot** count towards your reimbursable meal component requirements.*

This is what the next portion of the food bar looks like.

Week of: May 10 Year: 2016	Monday	Tuesday	Wednesday	Thursday	Friday
Record Daily Participation: Elm (K-5) M (6-8) HS (9-12) A (Adult) ⇨	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=

We will first complete the week and year.

In this portion, you are asked to write down how many people ate that day. Pay attention though. It asks you to record the participation for elementary, middle school, high school, and adults.

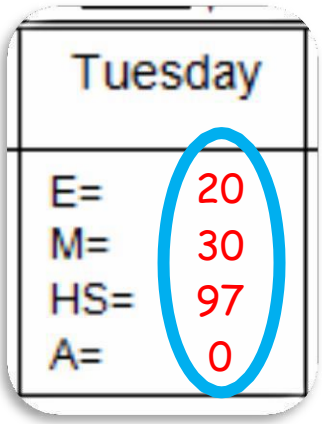
Each column in this section is separated by the days of the week.

Monday	Tuesday	Wednesday	Thursday	Friday
E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=

**Let's create a pretend school. There are 45 students in grades K-5, 30 students in grades 6-8, and 100 students in grades 9-12. It is time for lunch.

On Monday, **30** K-5 students, **24** 6-8 students, and **85** 9-12 students ate lunch in the lunch room. There were also **4** adults that ate lunch there. Create the daily participation for Monday.

Monday	
E=	30
M=	24
HS=	85
A=	4



On Tuesday, we had **20** K-5, **30** 6-8, **97** 9-12 and **no** adults for lunch.

Wednesday		Thursday		Friday	
E=	40	E=	45	E=	30
M=	15	M=	15	M=	23
HS=	84	HS=	76	HS=	80
A=	12	A=	5	A=	5

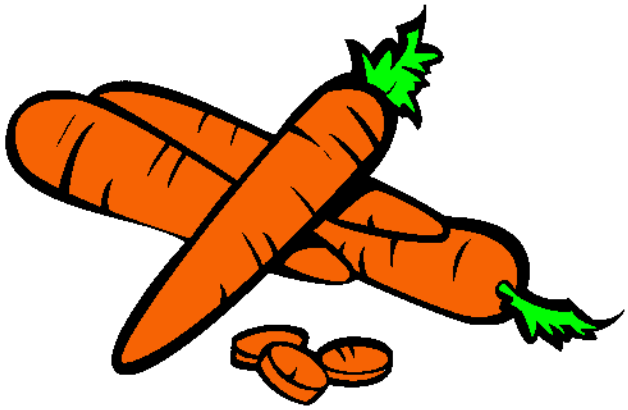
We can continue to do this for the rest of the days of the week.

The next portion of the food bar form is the food items used and form. Here is where you are going to put all of your food items that you have on your food bar.

Food Items Used and Form (fresh, frozen, canned)
Romaine Lettuce
Tomatoes, diced
Ranch Dressing, lowfat
Carrots, shredded
Orange quarters
Red Kidney Bean Salad
Cabbage Salad
Vegetarian Beans
Watermelon Chunks
Broccoli Salad
Kiwi Slices
Pineapple Tidbits

And this is an example of a completed section.

Notice that each item is very specific in the description.



Now that you have written down all of the items on your food bar, you can break them down into servings.

It would be fast and easy to complete the food bar form if you completed one row at a time. Like this:

				Item:				
Romaine Lettuce	Mole	DG	Lbs	10	7	7	8	5

We will complete the form in steps.

Step 1: Write down your food item

Food Items Used and Form (fresh, frozen, canned)
Romaine Lettuce

Step 2: Look up the item's product brand number or school recipe number.

A product brand number is the name of the brand you use.

Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)
Romaine Lettuce	Mole

Step 3: Determine the vegetable subgroup key

Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key
Romaine Lettuce	Mole	DG

If you have something other than a vegetable on your food bar, it is very simple to fill out this column…you skip it!

What is a vegetable subgroup key?

Since there is a weekly veggie subgroup requirement this helps you plan your menu to cover those weekly requirements. For example, diced tomatoes are a red-orange subgroup. Common veggies in each subgroup can be found in Appendix F.

Colors don't always match the same subgroups that describe them. For example, green beans, although dark green in color, are on the "other" subgroup.

Step 4: Find the unit of weight or number of servings

This section is asking you to record the unit of weight, volume, or number of servings you put out.

Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings
Romaine Lettuce	Mole	DG	lbs

Some common examples are:

Cowboy Caviar- cups Diced tomatoes-lbs

Ranch Dressing- Quarts/ Gallons

Step 5: Record the number of total quantities used for each item on the food bar.

This section wants you to tell us how many units you went through on your food bar each day.

*For example, you put Romaine Lettuce on your food bar. It goes by pounds. You put 5 pounds out on your bar, and you had to put another 5 pounds out on Monday. That means you used 10 "quantities" (lbs) on Monday. So your record for Romaine Lettuce should look like this:

				Monday	Tuesday	Wednesday	Thursday	Friday
				E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=
Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SR#) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings	Record each day the <u>total quantities used</u> of each food item on the food bar. Use only one line per food item.				
Romaine Lettuce	Mole	D	lbs	10				

Do the same for the rest of the days of the week. If you did not serve any Romaine lettuce on a certain day, you can just leave that cell blank.

				Monday	Tuesday	Wednesday	Thursday	Friday
				E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=
Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SIM) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings	Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.				
Romaine Lettuce	Mole	DG	lbs	10	1		5	

If an item is canned, be sure to record the can size of the product.
Let's do an example line with a fruit.
We will do everything the same way, except for the things that are circled.

				Monday	Tuesday	Wednesday	Thursday	Friday
				E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=	E= M= HS= A=
Food Items Used and Form (fresh, frozen, canned)	Product Brand # or School Recipe (SIM) or Commodity (C)	Vegetable Subgroup Key	Unit of Weight or Volume or # of Servings	Record each day the **total quantities used** of each food item on the food bar. Use only one line per food item.				
Romaine Lettuce	Mole	D	lbs	10	1		5	
Pineapple Tidbits, lt syrup	C		#10 can			20		4

Instead of lbs, we will use #10 cans

For small quantities, use cups, rather than #10 cans

Continue to do this with the rest of the items on your food bar.

Use the instructions on the top of the food bar for help
Filling out one item completely at a time makes the form easier to fill out
Filling out the weekly bar form instead of the daily bar form saves you a lot of time
Be as specific as possible. This will help you avoid issues with your forms

All foods offered during the meal must be recorded on the daily production record or the food bar form

---

Congrats! You are finished with your Food Production Record!!

Appendix

A. Federal Regulations

B. Food Buying Guide

C. Meal Patterns

D. Current Templates

E. Conversions

F. Vegetable Subgroup Key

G. Common Whole Grains

H. Benefits of Production Records

A. Federal Regulations

When you provide school lunches, each of your meals must meet requirements that are set by the government. These requirements are called federal regulations. The federal regulations give you information of the requirements that range from Reimbursement process to state agency participation to procurement. The federal regulations website is a great tool to help you get the most out of your food service program. This is the link that shows all of the federal regulations that you need to follow in order to serve meals to your students:

http://www.ecfr.gov/cgi-bin/text-idx?gp=&SID=3823767be9b298803ad7bee630652cad&mc=true&tpl=/ecfrbrowse/Title07/7CIIsubchapA.tpl

OR

http://www.fns.usda.gov/school-meals/regulations

B. Food Buying Guide

On the USDA Team Nutrition website, you can find our food buying guide. This resource provides average yields and can help you determine the quantity of food items to purchase for your meals and how much each product will result, so that way you know how much of an item to buy to get the right amount of servings for your students. There is a link to the food buying guide below:

http://www.fns.usda.gov/tn/food-buying-guide-school-meal-programs

C. Meal Patterns

Shown on the next page are charts for the meal pattern requirements for a five day school week breakfast and lunch. These charts include things like how many servings of fruit you must serve to each age group daily, the minimum and maximum amount of calories you can give each student, etc. You must meet these requirements in order to claim your meal for reimbursement (which means getting money!).

5- Day School Week Lunch				
Components & Dietary Specifications	Grades K-8 Weekly (daily)	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)
Fruit (cups)	2.5 (0.5)	2.5 (0.5)	2.5 (0.5)	5 (1)
Vegetables (cups)	3.75 (.75)	3.75 (.75)	3.75 (.75)	5 (1)
Dark Green	.5	.5	.5	.5
Red/Orange	.75	.75	.75	.75
Beans/Peas (Legumes)	.5	.5	.5	.5
Starchy	.5	.5	.5	.5
Other	.5	.5	.5	.5
Addtl Veg (cups) to Reach Total	1	1	1	1.5
Grains (oz eq)	8 (1)	8 (1)	8 (1)	10 (2)
Meats/ Meat Alts	9 (1)	8 (1)	9 (1)	10 (2)
Fluid Milk (cups)	5 (1)	5 (1)	5 (1)	5 (1)
Min-max Cals daily avg	600-650	550-650	600-700	750-850
Saturated fat (% of calories)	Less than 10%	Less than 10%	Less than 10%	Less than 10%
Sodium mg max-daily average (Target 1)	≤1230mg	≤1230mg	≤1360mg	≤1420mg

Meal Pattern for 5-Day School Week					
Breakfast					
Components & Dietary Specifications	Grades K-8 Weekly (daily)	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)	Grades K-12 Weekly (daily)
Fruit (cups)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Grains (oz eq)	8 (1)	7 (1)	8 (1)	9 (1)	9 (1)
Fluid Milk (cups)	5 (1)	5 (1)	5 (1)	5 (1)	5 (1)
Min- Max Cals. Daily avg.	400-500	350-500	400-550	450-600	450-500
Saturated Fat (% of calories)	Less than 10%	Less than 10%	Less than 10%	Less than 10%	Less than 10%
Sodium mg max- Daily Average (Target 1)	≤ 540 mg	≤ 540 mg	≤ 600 mg	≤ 640 mg	≤ 540 mg

National school lunch program		Sodium reduction: Timeline & amount		
Age/grade group	Baseline: Average current sodium levels in meals as offered[1] (mg)	Target 1: July 1, 2014 (SY 2014-2015) (mg)	Target 2: July 1, 2017 (SY 2017-2018) (mg)	Final Target: July 1, 2022 (SY 2022-2023) (mg)
K-5	1,377 (elementary)	≤1,230	≤935	≤640
6-8	1,520 (middle)	≤1,360	≤1,035	≤710
9-12	1,588 (high)	≤1,420	≤1,080	≤740

Age/grade group	Baseline: average current sodium levels as offered[1] (mg)	Target 1: July 1, 2014 SY 2014-2015 (mg)	Target 2: July 1, 2017 SY 2017-2018 (mg)	Final Target: July 1, 2022 SY 2022-2023 (mg)
School Breakfast Program				
K-5	573 (elementary)	≤540	≤485	≤430
6-8	629 (middle)	≤600	≤535	≤470
9-12	686 (high)	≤640	≤570	≤500

*******Target 2 Sodium Requirements go into effect in SY 17-18. Be sure to use the current sodium requirements. *******

D. Current Templates

The world around us is changing. Things change. The CANS production record templates also change from time to time. Be sure to check in with the Child and Adult Nutrition Services website often so that you are aware of and up to date with all of the changes that happen. Check out any updates:

http://doe.sd.gov/cans/nslp.aspx

Once you get to this website, look for the section called Menu Planning. There you will find the link for production records and the food bar forms. There will be a current example copy of a production record for you!

E. Conversions

We have included some standard conversions that we think may help.

Fractions	Decimals
1/8	0.125
1/4	0.250
1/3	0.333
1/2	0.500
2/3	0.667
3/4	0.750

To change	To	Multiply By
Ounces (oz)	Grams (g)	28.35
Pounds (lb)	Kilograms (kg)	.45
Teaspoons (tsp)	Milliliters (ml)	4.93
Tablespoons (tbsp.)	Milliliters (ml)	14.79
Fluid ounces (fl oz)	Milliliters (ml)	29.58
Cups (c)	Liters (l)	0.24
Pints(pt)	Liters(l)	0.47
Quarts (qt)	Liters (l)	0.946
Gallons (gal)	Liters (l)	3.8

F. Vegetable Subgroup

Here (on the next page) are some common vegetable subgroups and some of the vegetables in each. This will help you fill out your food bar form. You can find a complete list to print out on the CANS website. Find the National School Lunch/ Breakfast Programs, and find "Vegetable Subgroups List" under *Menu Planning.*

http://doe.sd.gov/cans/nslp.aspx

Other Vegetables	Other Vegetables
Artichoke	Iceberg (Head) Lettuce
Asparagus	Kohlrabi
Avocado	Mushrooms
Bean, Green or Wax	Radishes
Bean Sprouts	Sugar Snap Peas
Beets	Zucchini
Bell of (or not of) Chili Peppers	
Brussels Sprouts	
Cabbage, Green or Red	
Cauliflower	
Celery	
Chinese Snow Peas	
Cucumbers	
Eggplant	

Red/Orange	Beans/Peas (Legumes- dried mature beans and peas)
Acorn Squash	Black Beans
Butternut Squash	Edamame
Carrots	Garbanzo Beans, Chickpeas
Hubbard Squash	Great Northern Beans
Pumpkin	Kidney Beans
Red/Orange Peppers	Lentils
Salsa	Lima Beans, Dry
Sweet Potatoes	Navy Beans
Tomato Products	Pinto Beans
	Small Red Beans
	Split Peas
	White Beans

Dark Green	Starchy
Broccoli	Corn
Collard Greens	Green Peas
Dark Green Leafy Lettuce	Lima Beans, Canned, Fresh, or Frozen
Escarole Endive	Jicama (Yam Bean)
Kale	Potato Products, White
Romaine Lettuce	Water Chestnuts
Spinach	

G. Common Whole Grains

It can be tricky to determine if your grain meets the Whole Grain Rich Requirements. Below is a list of some common whole grains. To find out if your grain meets the requirements, there is a chart below. You can find more information in the "USDA Whole Grain Resource" link posted on the CANS NSLP Website under the section called *MenuPlanning*.

Wheat (RED)

- Wheat berries
- Whole grain wheat
- Cracked wheat or crushed wheat
- Whole wheat flour
- Bromated whole wheat flour
- Graham flour
- Entire wheat flour
- Whole durum flour
- Whole wheat flakes
- Sprouted wheat
- Sprouted wheat berries
- Bulgur
- Whole grain bulgur

Barley

- Whole barley
- Whole grain barley
- Whole barley flakes
- Whole barley flour
- Whole grain barley flour
- Dehulled barley
- Dehulled barley flour

Corn

- Whole corn
- Whole corn flour
- Whole grain corn flour
- Whole grain cornmeal
- Whole cornmeal
- Whole grain grits

Wheat (WHITE)

- Whole white wheat
- Whole white wheat flour

Brown Rice

- Brown rice
- Brown rice flour

Oats

- Whole oats
- Oat groats
- Oatmeal or rolled oats
- Whole oat flour

Wild Rice

- Wild rice
- Wild rice flour

Less Common Grains; to be whole grains, "whole" must be listed before the grain name

- Einkorn
- Kamut
- Emmer (farro)
- Teff
- Triticale
- spelt
- Buckwheat
- Amaranth
- Sorghum (milo)
- Millet
- Quinoa

H. Benefits of Production Records

Sometimes people don't realize just how important production records are. Being required by regulation isn't the only reason you should complete them, though. You should also complete them because production records:

- Show how planned meals contribute to meal patterns
- Help identify information needed for a nutrient analysis
- Support monthly claims for reimbursement
- Help forecast future food preparation when the same or similar menu is planned
- Help menu planners determine unpopular menu items that can be removed
- Help determine when increasing or decreasing the quantity of menu items is necessary

Food Production Cover

Food Buying Guide Calculator

Can be found here: http://fbg.theicn.org/

Food Buying User Manual

Can be found here:
https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/FNS-FBG-User-Manual.pdf

Food Buying Guide Training Slides

Can be found here: http://doe.sd.gov/cans/documents/UsingFdByngGd.pdf

Using Standardized Recipes Training Slides

Can be found here: http://doe.sd.gov/cans/documents/UsingStndrdzdRecipes.pdf

Component Crediting Training Slides

Can be found here: http://doe.sd.gov/cans/documents/CmpntCrdtng.pdf

Food Buying Guide Calculator

Can be found here:
http://fbg.theicn.org/

User Manual for Food Buying Guide

Can be found here:
https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/FNS-FBG-User-Manual.pdf

United States Department of Agriculture

Food and Nutrition Service

User Manual for
Food Buying Guide (FBG)

Version 1.2.5

May 25, 2018

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Glossary

Table 1 Glossary

Acronym	Description
CACFP	Child and Adult Care Food Program
FBG	Food Buying Guide
FNS	Food and Nutrition Service
PFS	Product Formulation Statement
RAW	Recipe Analysis Workbook
SFP	Supplemental Food Program
USDA	U.S. Department of Agriculture

1 Introduction

The Food and Nutrition Service (FNS), an agency of the U.S. Department of Agriculture (USDA), has a responsibility to ensure that school nutrition professionals have the necessary knowledge to plan, purchase, prepare, and serve nourishing meals that meet Federal meal pattern requirements and meet the operational needs of school districts. The Web-based Food Buying Guide (FBG) allows for easier searching, navigating, and displaying of key information for food items.

The USDA FBG is an essential tool used to assist in:

1. purchasing the right amount of food and purchasing it most economically, and
2. determining the specific contribution each food makes toward the meal pattern requirements to ensure that meals provide necessary nourishment and meet program requirements for reimbursement.

In addition, with yield data for more than 2,200 food items, this guide can provide ideas for adding new foods or new forms of familiar foods to the menus. The FBG is widely used by school food service professionals participating in the National School Lunch Program and School Breakfast Program. It is also appropriate for use in the Child and Adult Care Food Program as well as the Summer Food Service Program.

1.1 Accessibility

All reports (e.g., Yield Data, Compare Food Items, Food Item Detail, Product Formulation Statement, and Recipe Analysis Workbook) on the FBG tool can be printed (as PDF) or exported and saved in the |-delimited formats that can then be imported into Microsoft Excel. If you have trouble accessing, printing, and saving any of these reports, please send your assistance request to CNPNTAB@fns.usda.gov and you will receive a response within 48-business hours.

Please report website accessibility problems to CNPNTAB@fns.usda.gov via email or using the Contact Us feature of the application (as described in section 2.4.6.3). In your message, include the page address or URL and the specific problems you have encountered.

1.1.1 Keyboard Navigation

The FBG application can be navigated without a mouse using the keyboard only. Use the Tab key to move between the page controls and the Enter key to make selections and press buttons.

1.2 Overview

1.2.1 Key Information

Site URL: http://www.foodbuyingguide.fns.usda.gov

1.2.2 User Groups

FBG has three main user groups: Guest User, Registered User, and Administrator User. Each user can belong to one Organization Type: FNS National Office, FNS Regional Office, Vendor, State Agency, School, Child Care, and Other. Functionality available to each user depends on his user group and Organization Type.

- **Guest Users:** Public users can access key components of the FBG through the Internet without providing login credentials or creating a user account. Guest users will have access to search and view Food Items and create a Favorites list. However, the Favorites list will only be generated and remain active while the user is actively using the FBG site. If the user closes the FBG site and returns to it, the Favorites list will not be saved.

- **Table 2 Guest User Permissions per Organization Type**

Organization	Text-only screens	Search	Favorites	RAW	PFS	Admin Features
FNS National Office	x	x	x*			
Vendor	x	x	x*			
FNS Regional Office, State Agency, School, Child Care, Other	x	x	x*			

* - Functionality is available, but will only be persistent during user's browser session.

- **Registered Users:** Registered users are logged in to the FBG site using their eAuthentication credentials. Using the FBG site as a registered user gives the user extra capabilities, such as:
  - save the generated Favorites list;
  - analyze recipes (Recipe Analysis Workbook functionality) and save them;
  - for manufacturers, ability to create and save Product Formulation Statements.

- **Table 3 Registered User Permissions per Organization Type**

Organization	Text-only screens	Search	Favorites	RAW	PFS	Admin Features
FNS National Office, FNS Regional Office	x	x	x	x	x	
Vendor	x	x	x		x	
State Agency, School, Child Care, Other	x	x	x	x		

- **Administrator:** Site Administrators have elevated privileges within the application, and in addition to all functionality available to registered users, can add food items to the database and perform minor user administration activities.

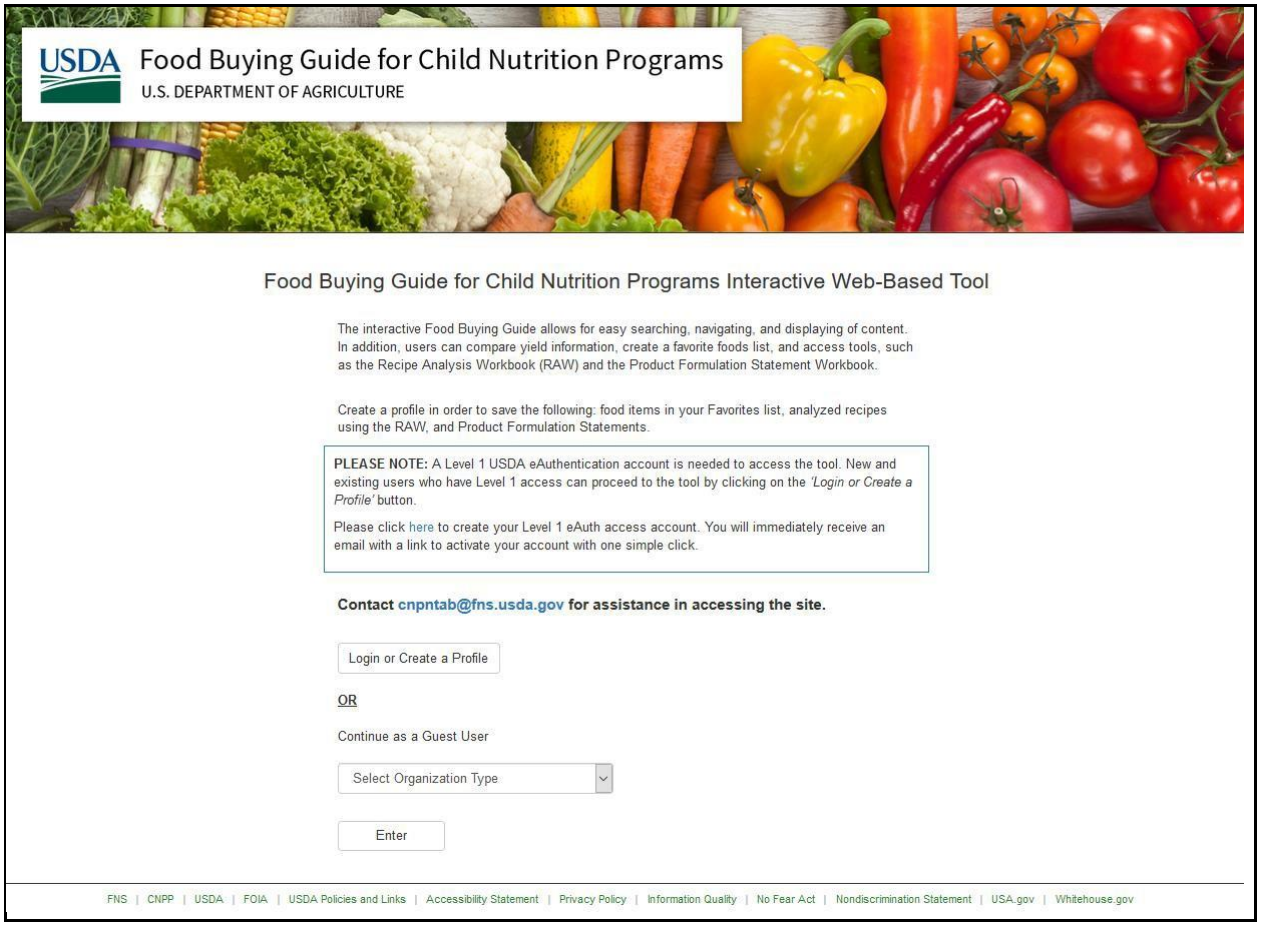
Table 4 Administrator User Permissions per Organization Type

Organization	Text-only screens	Search	Favorites	RAW	PFS	Admin Features
FNS National Office	x	x	x	x	x	x

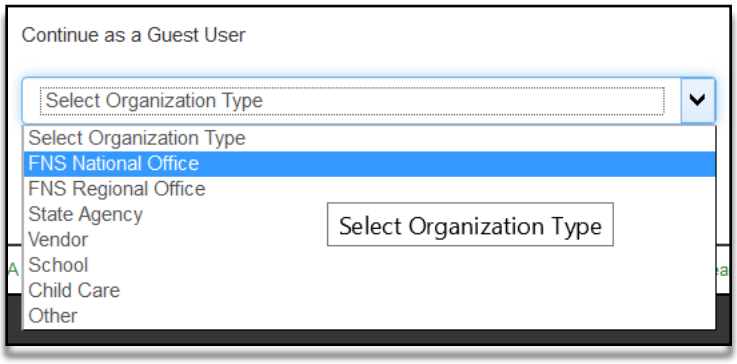
2 Guest User

2.1 Logging In

When navigating to the FBG URL, a User will first see the following Login Screen:

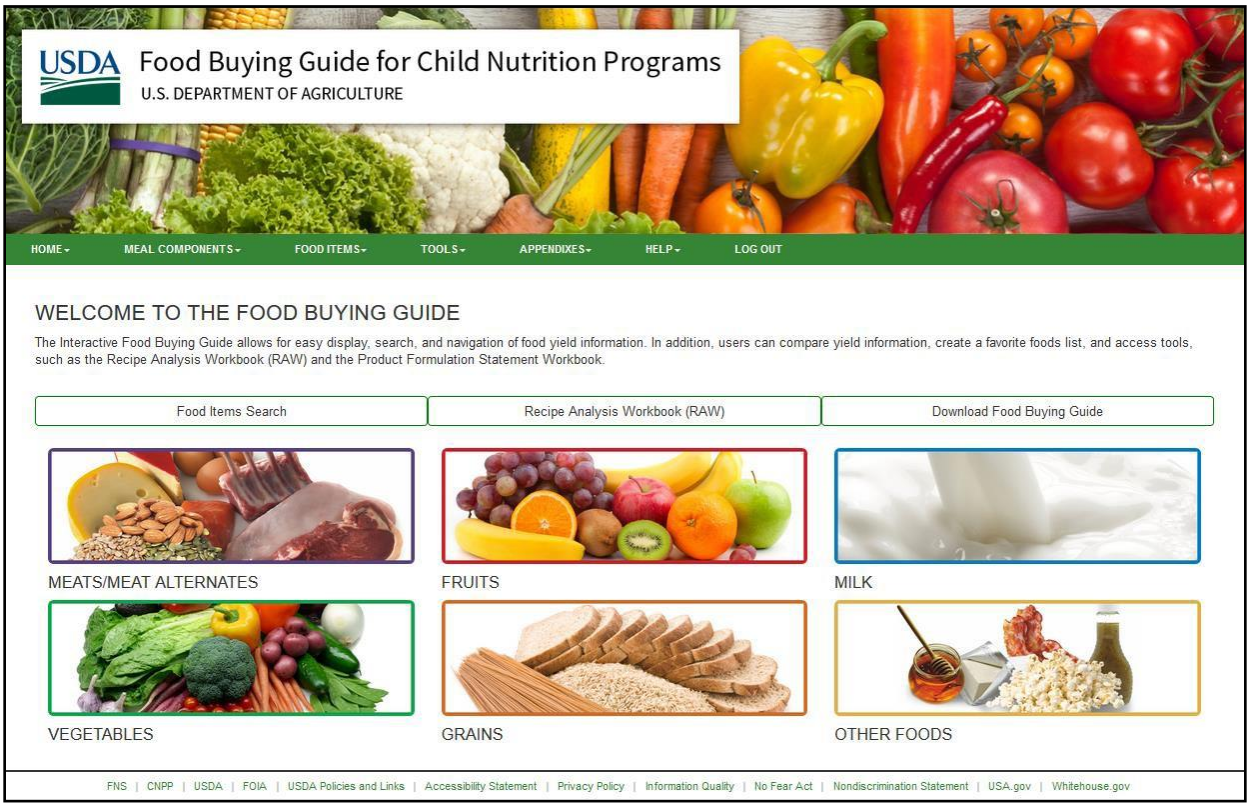


To continue as a Guest User, select an "Organization Type" from the dropdown menu and click "Enter." Different subsets of functionality will be available depending in the "Organization Type" selected.



2.2 FBG Home Screen

From the main FBG Home Screen, the Guest Users can use the top navigation links and main screen buttons to access information.

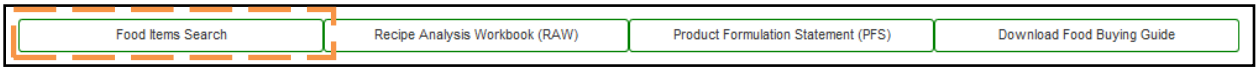


The links found in the top navigation of the Home Screen stay consistent throughout the application. Different subsets of functionality will be available depending in the Organization Type selected. The functions associated with each top navigation option are further described in Section 2.4.

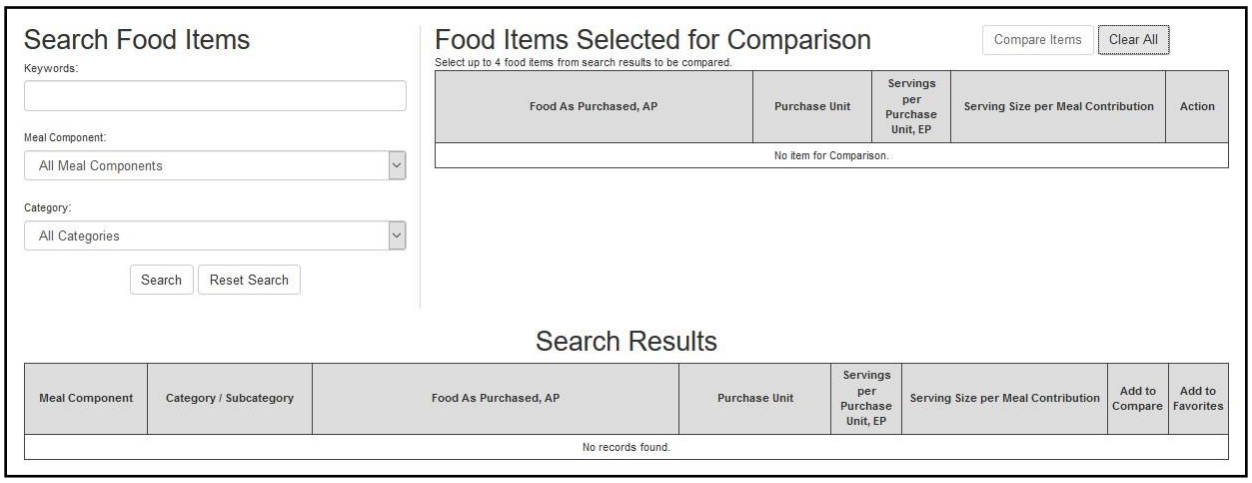
2.3 Home Screen Buttons

2.3.1 Food Items Search

Click the "Food Items Search" button:

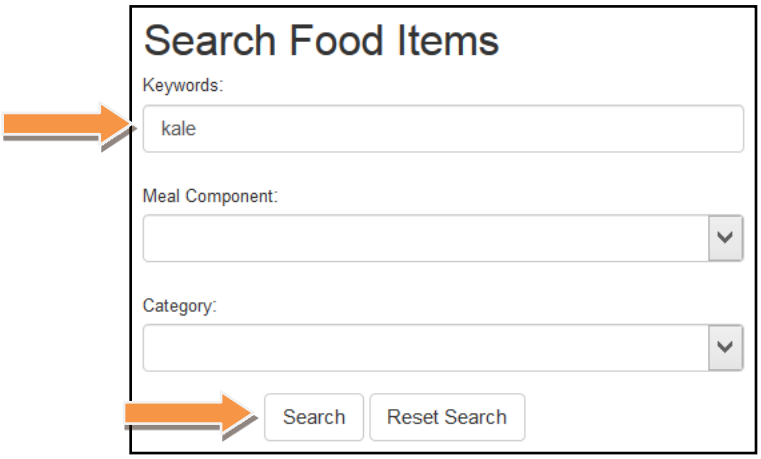


On the Search Food Items Screen, the users can search food items by using several search criteria. To clear selected criteria, the users can click "Reset Search."



2.3.1.1 Search by Keyword

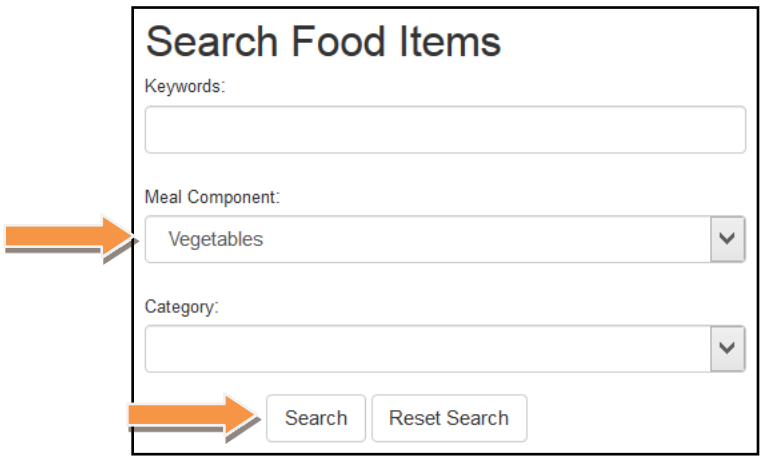
In the "Keyword" text box, type in a keyword and click the "Search" button.



2.3.1.2 Search by Meal Component

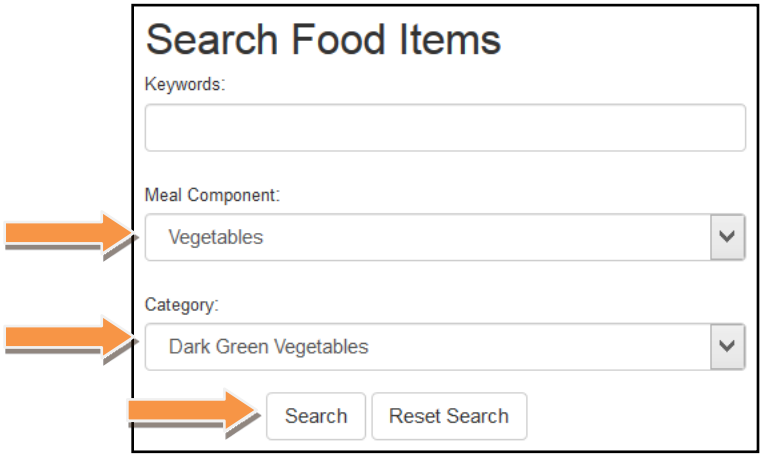
Users can also search for food items using the "Meal Component" dropdown options. To initiate a search using these search characteristics, the user fills in different fields on the same screen previously described for the keyword search.

In the "Meal Component" dropdown menu, select a meal component and click the "Search" button.



2.3.1.3 Search by Category

Users can use the "Category" dropdown menu to further filter the component selected in the "Meal Component" dropdown. To search by category, select a meal component from the dropdown list, select a category from the dropdown list, and click the "Search" button.



2.3.1.4 Using the Search Results

Once the user clicks "Search," the screen will display the search results according to the criteria selected.

Search Results

Meal Component	Category / Subcategory	Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Add to Compare	Add to Favorites
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Fresh[2] *Mung* *Footnote*	Pound	14.60	1/4 cup parboiled, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Fresh[2] *Soybean* *Footnote*	Pound	17.20	1/4 cup parboiled, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 10 Can (102 oz)	29.10	1/4 cup heated, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 10 Can (102 oz)	42.20	1/4 cup drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 300 Can (14 oz)	3.99	1/4 cup heated, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 300 Can (14 oz)	5.34	1/4 cup drained vegetable	Add	Add

Information displayed for each food item is:

- Meal Component
- Meal Category and Subcategory
- Food As Purchased, AP
- Purchase Unit
- Servings per Purchase Unit, EP
- Serving Size per Meal Contribution
- Add to Compare link – allows to add up to four items to be compared
- Add to Favorites link – adds the food item to Favorites

NOTE: Footnotes for Meal Component, Food Category, Subcategory and Food As Purchased, AP will be shown in Search Results when available. Click on the corresponding Footnote link to view footnote(s).

2.3.1.5 Search Results – View Food Item Details

To view information about a specific food item, click the blue link of the food item name in the "Food As Purchased, AP" column.

The following food item information will be displayed on Food Item Details Screen:

- Meal Component
- Meal Category
- Meal Subcategory
- Food As Purchased, AP
- Purchase Unit
- Servings per Purchase Unit, EP
- Serving Size per Meal Contribution
- Purchase Units for 100 Servings
- Footnotes

Food Item Details

Meal Component	Vegetables
Meal Category	Other Vegetables[1]
Meal Subcategory	BEAN SPROUTS
Food As Purchased, AP	**Bean Sprouts, Fresh[2]** *Mung*
Purchase Unit	Pound
Servings per Purchase Unit, EP	14.60
Serving Size per Meal Contribution	1/4 cup parboiled, drained vegetable
Purchase Units for 100 Servings	6.90
Additional Information	1 lb AP = 0.89 lb parboiled bean sprouts
Footnote	[1] For the purposes of the NSLP, the "Other Vegetables" requirement may be met with any additional amounts from the dark green, red/orange, and beans/peas (legumes) vegetable subgroups as defined in § 210.10(c)(2)(iii). Additional documentation from the vendor would be necessary to determine crediting. [2] Due to the increasing number of illnesses associated with consumption of raw sprouts, the Food and Drug Administration has advised all consumers – especially children, pregnant women, the elderly, and persons with weakened immune systems – to not eat raw sprouts as a way to reduce the risk of foodborne illness. Therefore, raw sprout data served in the raw state has been intentionally omitted.

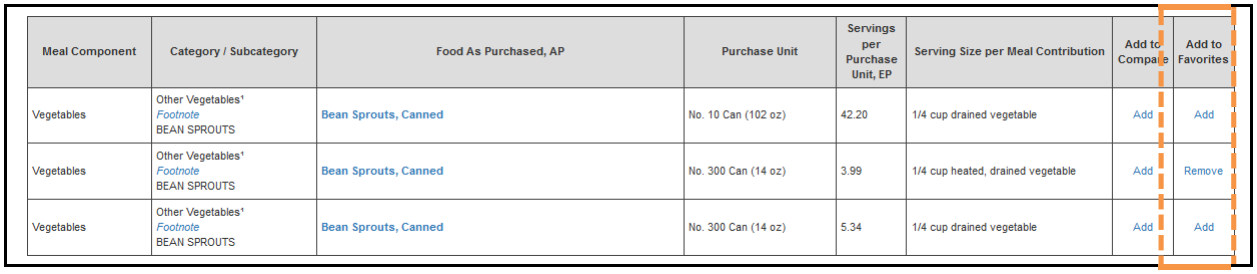
View PDF | Export | Add To Favorites | Close

From this screen, the user has the following options:

- The "View PDF" button opens a PDF that contains all information on Food Item Details page. The PDF can then be saved or printed.
- The "Export" button opens a text file that contains all information on Food Item Details page except Footnotes. The text file is delimited by "|" character, and can be imported into Microsoft Excel. See section 2.5 for more information.
- The "Add to Favorites" / "Remove from Favorites" button adds (or removes) the selected food item to the user's Favorites list.
    - ***NOTE:*** For Guest Users, this Favorites list will only be generated and remain active while the user is actively using the FBG site. If the user closes the FBG site and returns to it, the Favorites list will not be saved.
- The "Close" button takes the user back to the Search Food Items Screen.

2.3.1.6 Search Results – Add Food Item to Favorites

To add food items to Favorites, click on the "Add" link of the "Add to Favorites" column of the Search Results table.

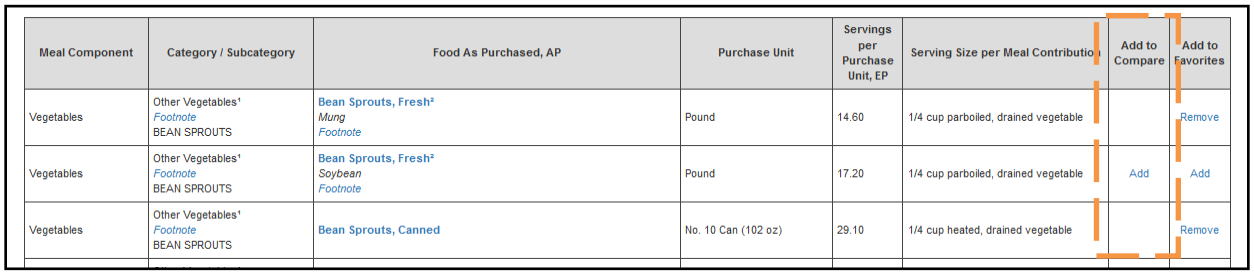


Meal Component	Category / Subcategory	Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Add to Compare	Add to Favorites
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 10 Can (102 oz)	42.20	1/4 cup drained vegetable	Add	Add
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 300 Can (14 oz)	3.99	1/4 cup heated, drained vegetable	Add	Remove
Vegetables	Other Vegetables[1] *Footnote* BEAN SPROUTS	Bean Sprouts, Canned	No. 300 Can (14 oz)	5.34	1/4 cup drained vegetable	Add	Add

You can remove a food item from Favorites from the Favorites screen, or you can click on the "Remove" link of the "Add to Favorites" column of the Search Results table. For more information see section 2.4.3.2.

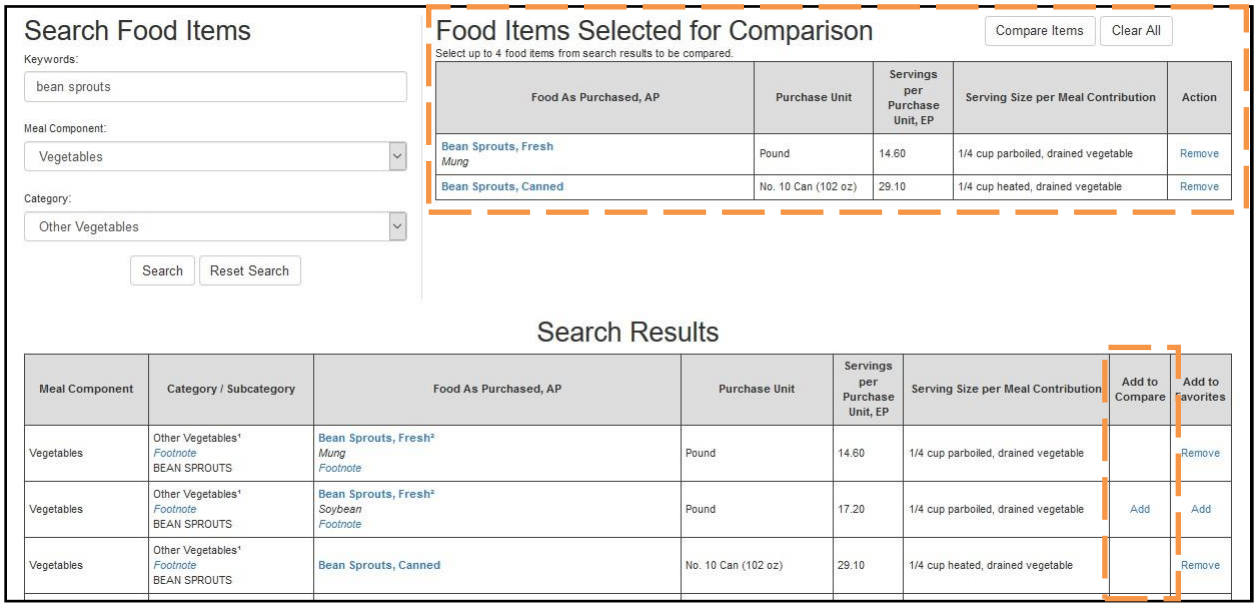
2.3.1.7 Search Results – Add Food Item to Compare Items

To compare food items, click on the "Add" link of the "Add to Compare" column of the Search Results table.



Meal Component	Category / Subcategory	Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Add to Compare	Add to Favorites
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Fresh[2] Mung Footnote	Pound	14.60	1/4 cup parboiled, drained vegetable		Remove
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Fresh[2] Soybean Footnote	Pound	17.20	1/4 cup parboiled, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Canned	No. 10 Can (102 oz)	29.10	1/4 cup heated, drained vegetable		Remove

The food item will then appear in the "Food Items Selected for Comparison" section of the Search screen. The corresponding rows in the Search Results table will no longer have the "Add" link in the "Add to Compare" column.



Search Food Items

Keywords: bean sprouts

Meal Component: Vegetables

Category: Other Vegetables

Search | Reset Search

Food Items Selected for Comparison

Compare Items | Clear All

Select up to 4 food items from search results to be compared.

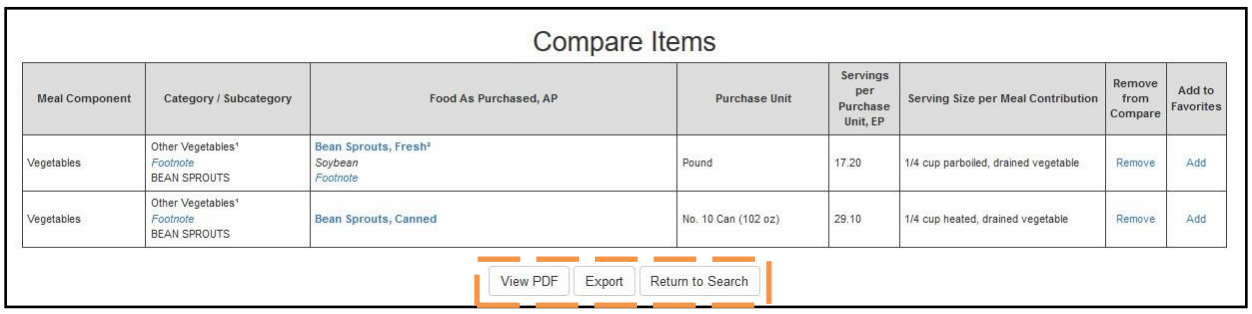
Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Action
Bean Sprouts, Fresh Mung	Pound	14.60	1/4 cup parboiled, drained vegetable	Remove
Bean Sprouts, Canned	No. 10 Can (102 oz)	29.10	1/4 cup heated, drained vegetable	Remove

Search Results

Meal Component	Category / Subcategory	Food As Purchased, AP	Purchase Unit	Servings per Purchase Unit, EP	Serving Size per Meal Contribution	Add to Compare	Add to Favorites
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Fresh[2] Mung Footnote	Pound	14.60	1/4 cup parboiled, drained vegetable		Remove
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Fresh[2] Soybean Footnote	Pound	17.20	1/4 cup parboiled, drained vegetable	Add	Add
Vegetables	Other Vegetables[1] Footnote BEAN SPROUTS	Bean Sprouts, Canned	No. 10 Can (102 oz)	29.10	1/4 cup heated, drained vegetable		Remove

You can add up to 4 food items to compare while navigating multiple pages of search results, or after performing a different search. Food items can be removed from the "Compare" list using the corresponding "Remove" links in the "Food Items Selected for Comparison" table. You can also clear all Compare items using the "Clear All" button.

Press "Compare Items" button to view full detail for the food items being compared on "Compare Items" screen.



From this screen, the user has the following options:

- The "View PDF" button opens a PDF that contains all information on Compare Items page. The PDF can then be saved or printed.
- The "Export" button opens a text file that contains all information on Compare Items page except Footnotes. The text file is delimited by "|" character, and can be imported into Microsoft Excel. See section 2.5 for more information.
- The "Return to Search" button takes the user back to the Search Food Items screen.

2.3.2 Recipe Analysis Workbook (RAW)

RAW functionality is activated by the "Recipe Analysis Workbook (RAW)" button.

NOTE: **This functionality is not available to Guest Users, please create an account to access it.** This functionality is available to Authenticated Users with selected Organization other than Vendor.

2.3.3 Product Formulation Statement (PFS)

PFS functionality is activated by the "Product Formulation Statement (PFS)" button.

> ***NOTE:*** **This functionality is not available to Guest Users, please create an account to access it.** This functionality is available to Authenticated Users with selected Organization of "Vendor," "FNS National Office," or "FNS Regional Office".

2.3.4 Download Food Buying Guide

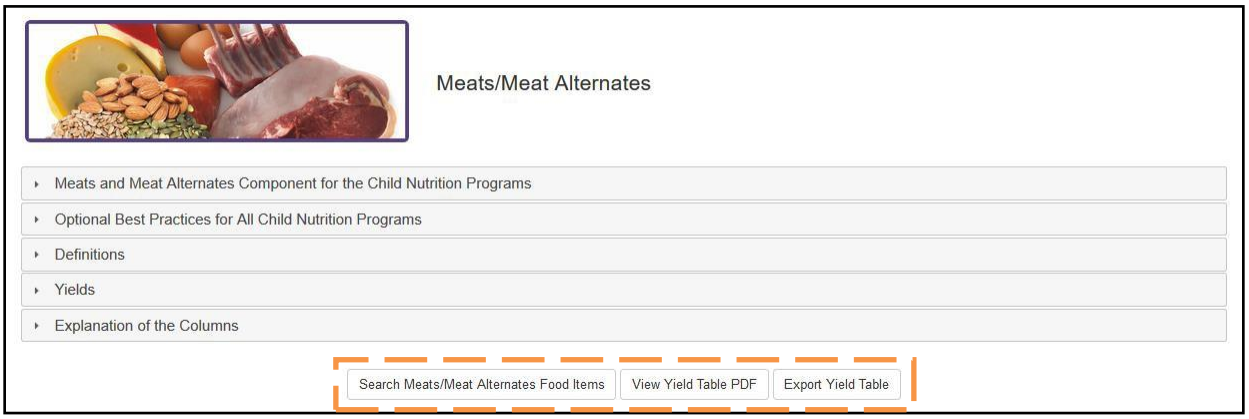
Click on the "Download Food Buying Guide" button to open the Download Food Buying Guide screen:

Download Food Buying Guide screen contains links to the Food Buying Guide Introduction, six Meal Component sections with Yield Tables, and Appendixes in PDF format. Click on each link to open the corresponding document.

2.3.5 View Meal Component Information

To view information about Meal Components, click on the corresponding meal component image on the Home screen:

The image button directs the user to an informational screen about that Meal Component.



To view information under the sub-headings on the screen, click on the grey heading bar (i.e., "Optional Best Practices for All Child Nutrition Programs" or "Definitions") to expand the section.

From this screen, the user has the following options:

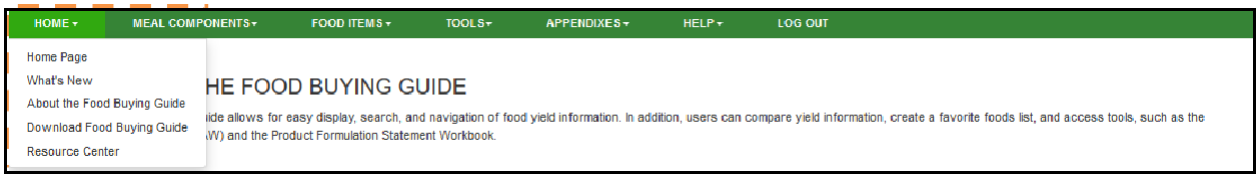
- Search meal component food items – the "Search" button takes the user to the Search Items screen with the "Meal Component" control pre-populated with the meal component being viewed.
- The "View Yield Table PDF" button opens a PDF view of the selected meal component's yield tables. The PDF can then be saved or printed.
- The "Export Yield Table" button opens a text file that contains all information for meal component's yield table except Footnotes. The text file is delimited by "|" character, and can be imported into Microsoft Excel. See section 2.5 for more information.

Users can use the steps outlined above to access information about each of the Meal Components.

2.4 Top Navigation Menus

In addition to navigating through FBG from the main screen, users can use the Top Navigation menus to access functionality within the site.

2.4.1 Home



2.4.1.1 Home Page

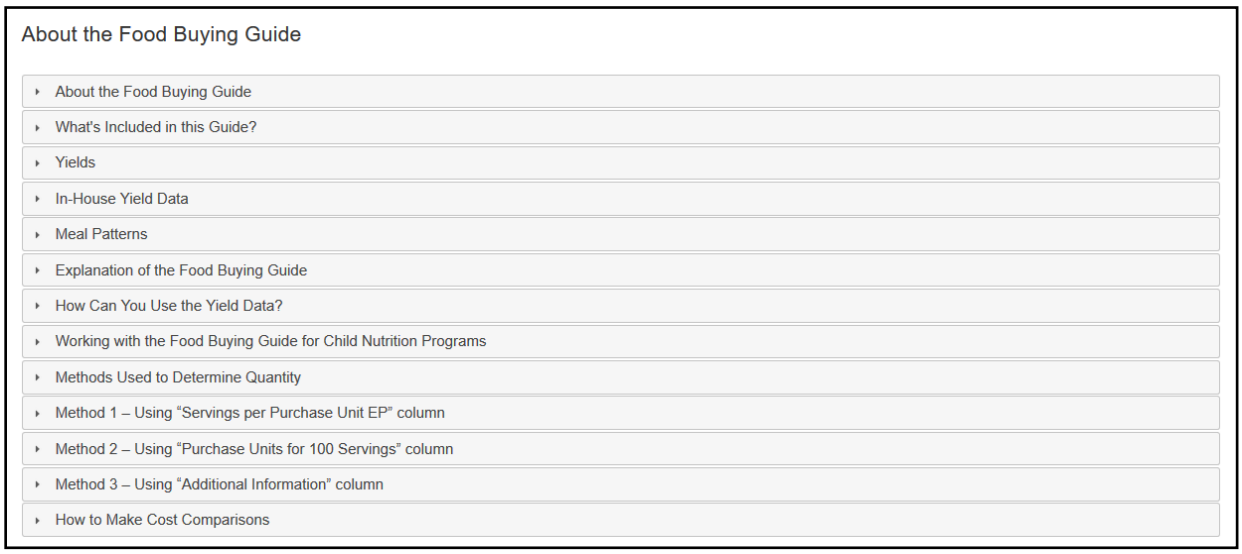
From the "Home" dropdown menu, users can view FBG Home Page screen (described in Section 2.2 above) by selecting the "Home Page" menu item.

2.4.1.2 What's New

From the "Home" dropdown menu, users can view the list of announcements by the FNS staff by selecting the "What's New" menu item. This menu item opens What's New screen that lists announcements that are currently active, if any.

2.4.1.3 About the Food Buying Guide

From the "Home" dropdown menu, users can view the About the Food Buying Guide screen by selecting the "About the Food Buying Guide" menu item.

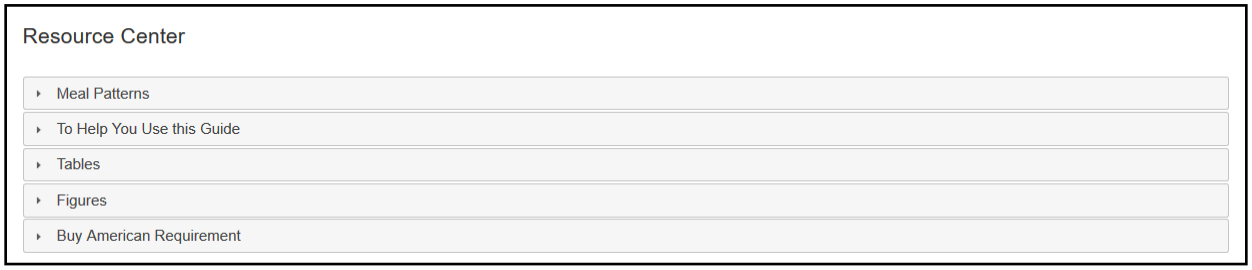


2.4.1.4 Download Food Buying Guide

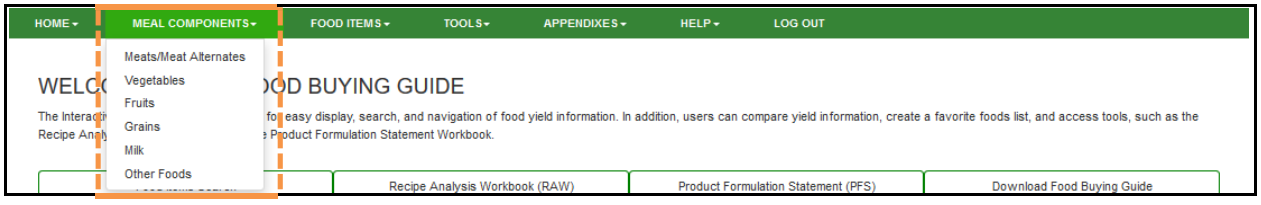
From the "Home" dropdown menu, users can view the Download Food Buying Guide screen by selecting the "Download Food Buying Guide" menu item.

2.4.1.5 Resource Center

From the "Home" dropdown menu, users can view the About the Food Buying Guide screen by selecting the "Resource Center" menu item. Resource Center screen provides the user with the Child Nutrition Programs Meal Pattern charts and reference tables and figures (i.e. Decimal Weight Equivalent table) to support information found in the Food Buying Guide. By clicking on the blue links, the users can access a PDF document of the information.



2.4.2 Meal Components



From the "Meal Components" dropdown menu, users can select an individual meal component to view more information specific to that meal component.

The users can navigate through the information following the same process outlined in Section 2.4.1.

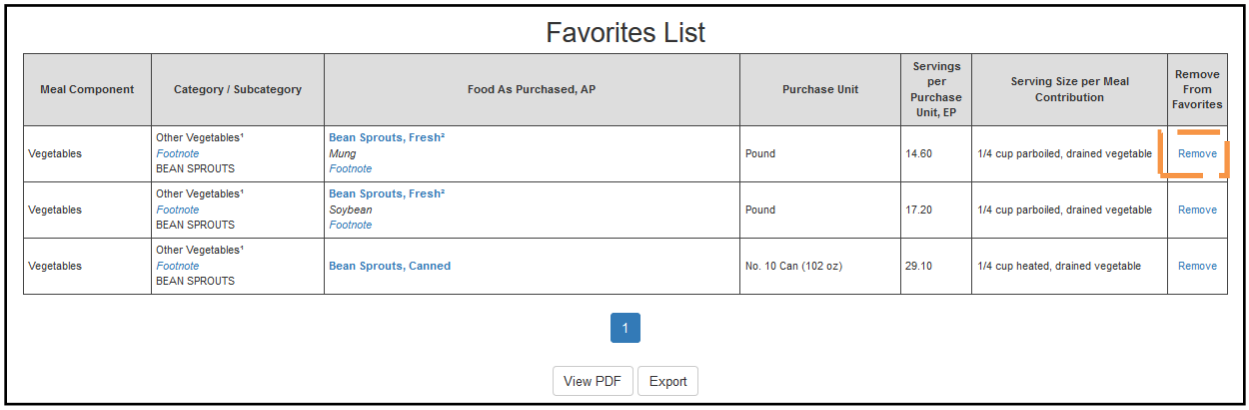
2.4.3 Food Items

2.4.3.1 Search

From the "Food Items" dropdown menu, users can select "Search" menu item to reach the Search Food Items screen and search through food items following the same process outlined in Section 2.3.1.

2.4.3.2 Favorites

From the "Food Items" dropdown menu, users can select "Favorites" menu item to reach the Favorites List screen:



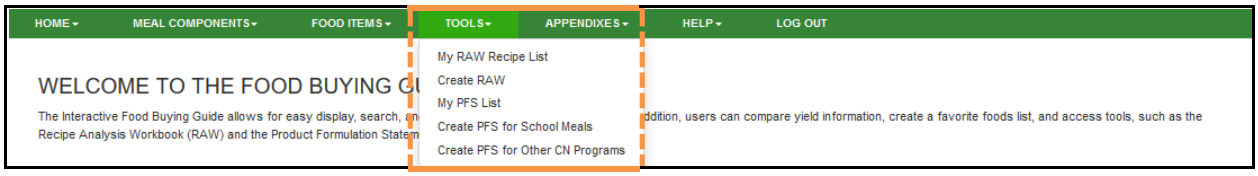
From this screen, the user has the following options:

- The "View PDF" button opens a PDF that contains all information on Favorites List page. The PDF can then be saved or printed.
- The "Export" button opens a text file that contains all information on Favorites List page except Footnotes. The text file is delimited by "|" character, and can be imported into Microsoft Excel. See section 2.5 for more information.

To remove an item from the Favorites list, click "Remove" link in the "Remove from Favorites" column of the Favorites list table.

> ***NOTE:*** For Guest Users, the Favorites list is not retained once they navigate away from the FBG Web site.

2.4.4 Tools

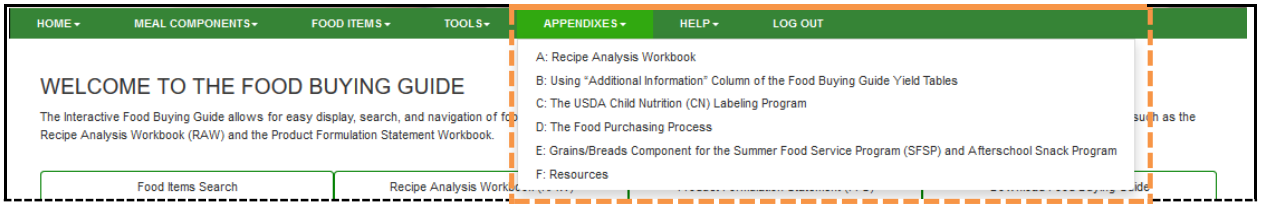


From the "Tools" dropdown menu, users can access the following:

The Tools top navigation menu provides the user with the following options:

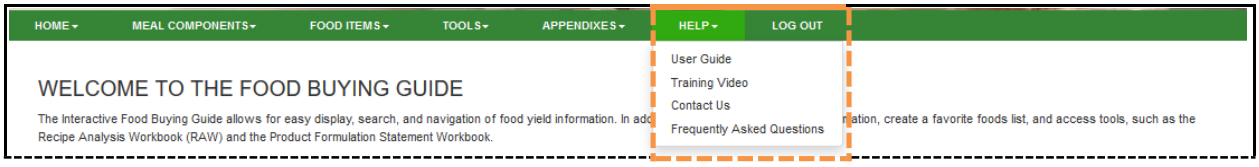
- My RAW Recipe List – list of user's RAW *(functionality is not available to guest users)*
- Analyze Recipe – create RAW *(functionality is not available to guest users)*
- My PFS List – list of user's PFS *(functionality is not available to guest users)*
- Created PFS for School Meals *(functionality is not available to guest users)*
- Created PFS for Other CN Programs *(functionality is not available to guest users)*

2.4.5 Appendixes



From the "Appendixes" dropdown menu, users can access more information about specific items related to the Food Buying Guide for Child Nutrition Programs.

2.4.6 Help



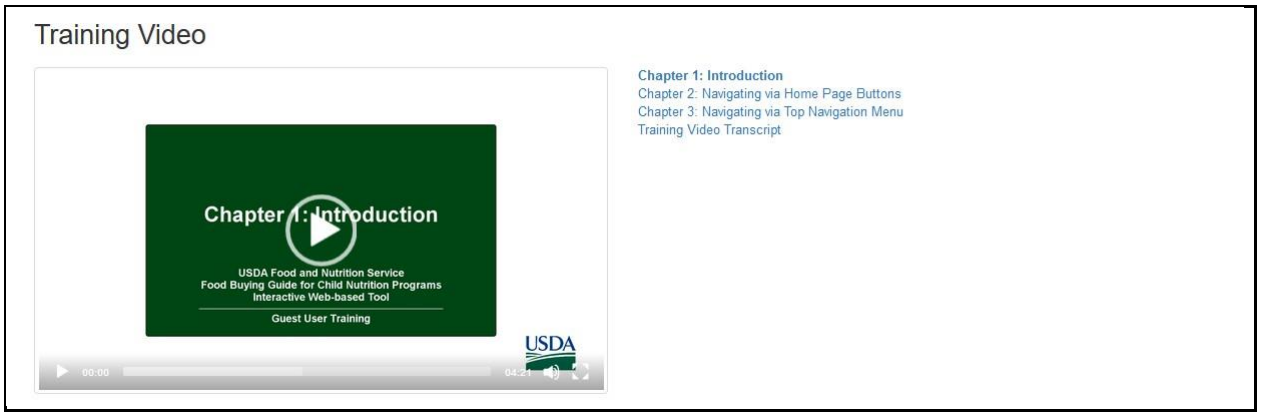
2.4.6.1 User Guide

From the "Help" dropdown menu, users can view access-level-appropriate User Guide in PDF format by selecting the "User Guide" menu item.

Please contact FNS though the Contact Us menu item (described below) or by emailing to CNPNTAB@fns.usda.gov request the user guide in another format.

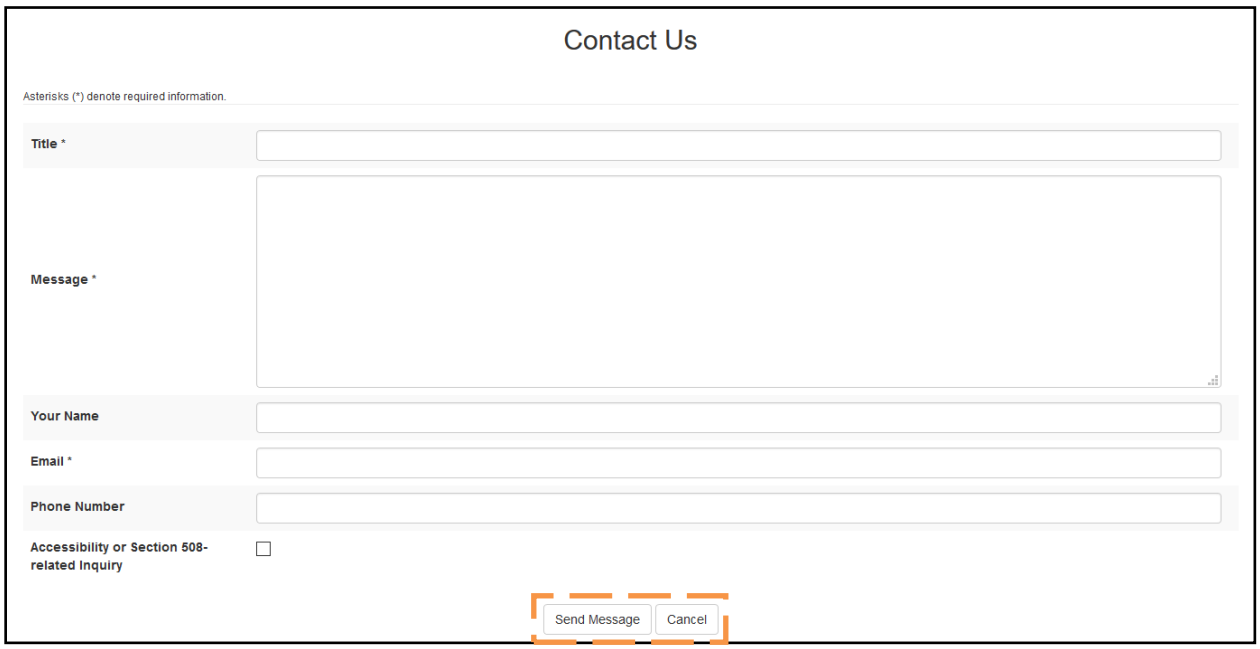
2.4.6.2 Training Video

The Training Video page contains a video player that displays the FBG training video. The first chapter of the training video is displayed in the video player automatically. Click on a link for each chapter for it to appear in the video player. Click on the link for Training Video Transcript to view the transcript of the video in PDF format.



2.4.6.3 Contact Us

From the "Help" dropdown menu, users can contact FNS team via email by selecting the "Contact Us" menu item. This menu item opens the Contact Us screen with a form:



On the Contact Us screen, fill in the following fields:

Table 5 Contact Us form fields

Field Name	Description
Title (required)	Title for your email
Message (required)	Body of your email
Your Name	Enter your name, so FNS staff can contact you if needed
Email (required)	Enter your email, so FNS staff can contact you if needed
Phone Number	Enter your phone number, so FNS staff can contact you if needed
Accessibility or Section 508-related Inquiry	Check this checkbox if you are contacting FNS regarding the application accessibility or a Section 508-related issue or inquiry. Checking this checkbox will alert FNS staff of nature of your request for faster processing.

From this screen, the user has the following options:

- Send the email message to CNPNTAB@fns.usda.gov using "Send Message" button. If this option is selected, the email is sent and the user is shown a conformation message.
- Cancel the action using the "Cancel" button.

2.4.6.4 Frequently Asked Questions

From the "Help" dropdown menu, users can view the application Frequently Asked Questions page by selecting the "Frequently Asked Questions" menu item.

2.4.7 Log Out

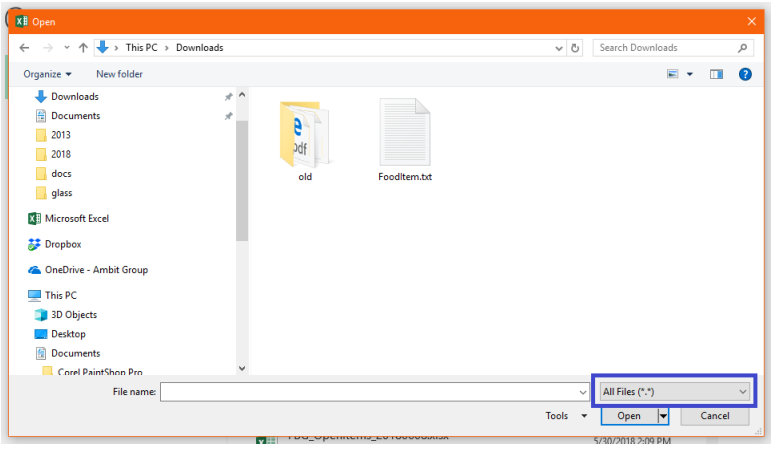
By clicking "Log Out," the Guest User's session ends and any temporarily saved information (Recipes, Favorites) is cleared.

2.5 Exporting Data to Microsoft Excel

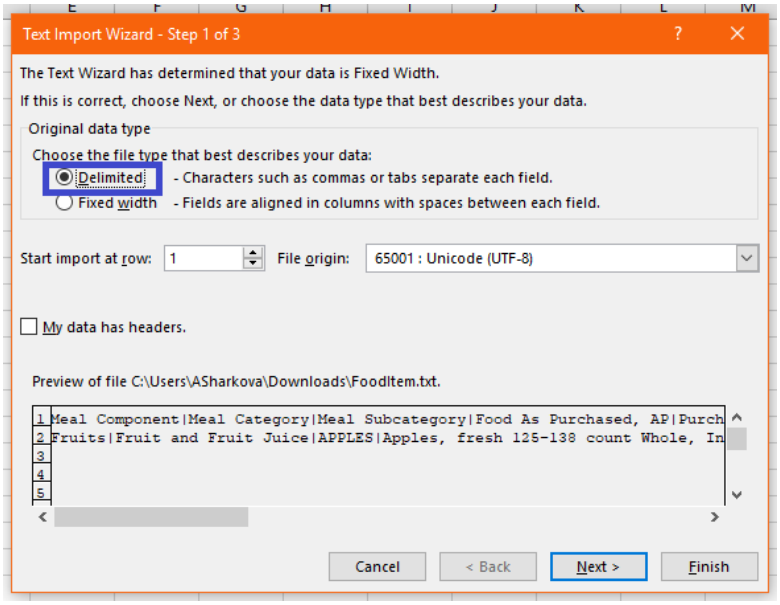
Throughout the FBG application, there are "Export" buttons that allow to export data displayed on the screen as a text file delimited by "|" character, that can be imported into Microsoft Excel. Follow the steps below to open the text file in Microsoft Excel.

2.5.1 For a Microsoft Windows Computer

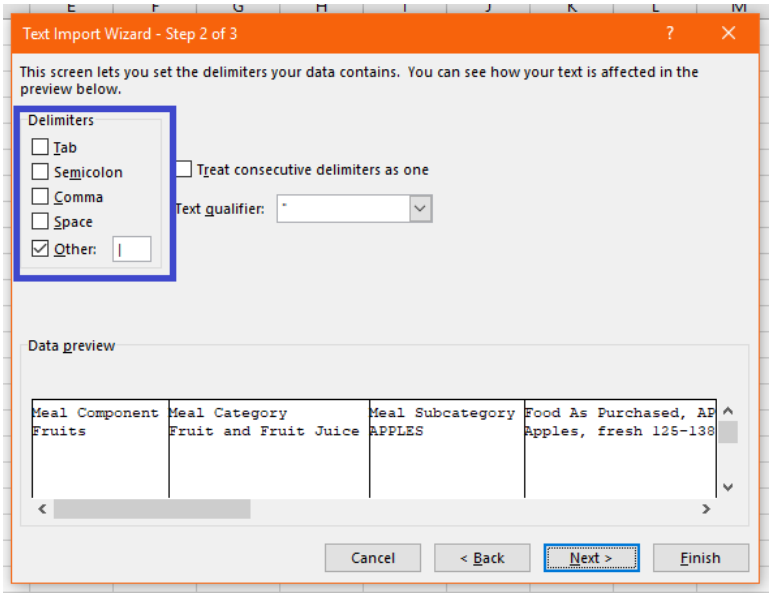
1. Click on Export button and save the file to your computer, noting the file name and directory (for example, FoodItem.txt in your Download directory)
2. Open Microsoft Excel
3. Go to "File" menu and click on the "Open" option
4. In the "Open" dialog, navigate to the directory where you downloaded the file and select "All Files" in the drop-down – so the .txt file is displayed:



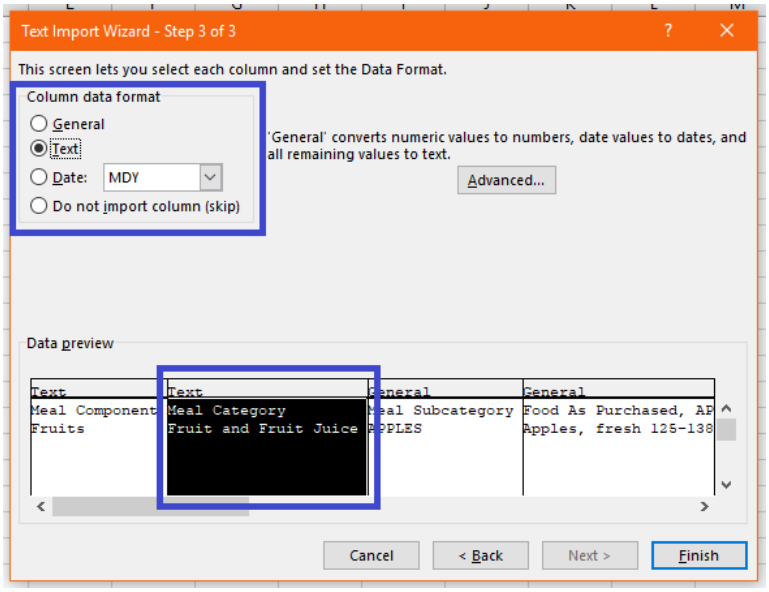
5. Click on the file and press the "Open" button
6. In the "Text Import Wizard – Step 1 of 3" dialog, select the "Delimited" radio button, then press the "Next" button:



7. In the "Text Import Wizard – Step 2 of 3" dialog, in the "Delimiters" section, uncheck the "Tab" option, check the "Other" option and enter the "|" character into the text field next to it, then press the "Next" button:



8. Optional: in the "Text Import Wizard – Step 3 of 3" dialog, click on each column in the "Data preview" section and then select the "Text" option in the "Column data format" section, changing the columns' type to Text one by one.
9. In the "Text Import Wizard – Step 3 of 3" dialog, press the "Finish" button:



10. The file will open in Microsoft Excel

2.5.2 For an Apple Mac Computer

1. Click on Export button and save the file to your computer, noting the file name and directory (for example, FoodItem.txt in your Download directory)
2. Open Microsoft Excel
3. Go to "File" menu and click on the "Open" option
4. In the "Open" dialog, select the "Open" icon in the left sidebar, then select "On my Mac". An Open panel will now display. Navigate to the directory where you downloaded the file so the .txt file is displayed
5. Click on the file and press the "Open" button
6. In the "Text Import Wizard – Step 1 of 3" dialog, select the "Delimited" radio button, then press the "Next" button
7. In the "Text Import Wizard – Step 2 of 3" dialog, in the "Delimiters" section, uncheck the "Tab" option, check the "Other" option and enter the "|" character into the text field next to it, then press the "Next" button
8. Optional: in the "Text Import Wizard – Step 3 of 3" dialog, click on each column in the "Data preview" section and then select the "Text" option in the "Column data format" section, changing the columns' type to Text one by one.
9. In the "Text Import Wizard – Step 3 of 3" dialog, press the "Finish" button
10. The file will open in Microsoft Excel

3 Registered User

Registered Users can use all site functionality in the same manner as outlined for Guest Users in Section 2. Additional features for registered users include:

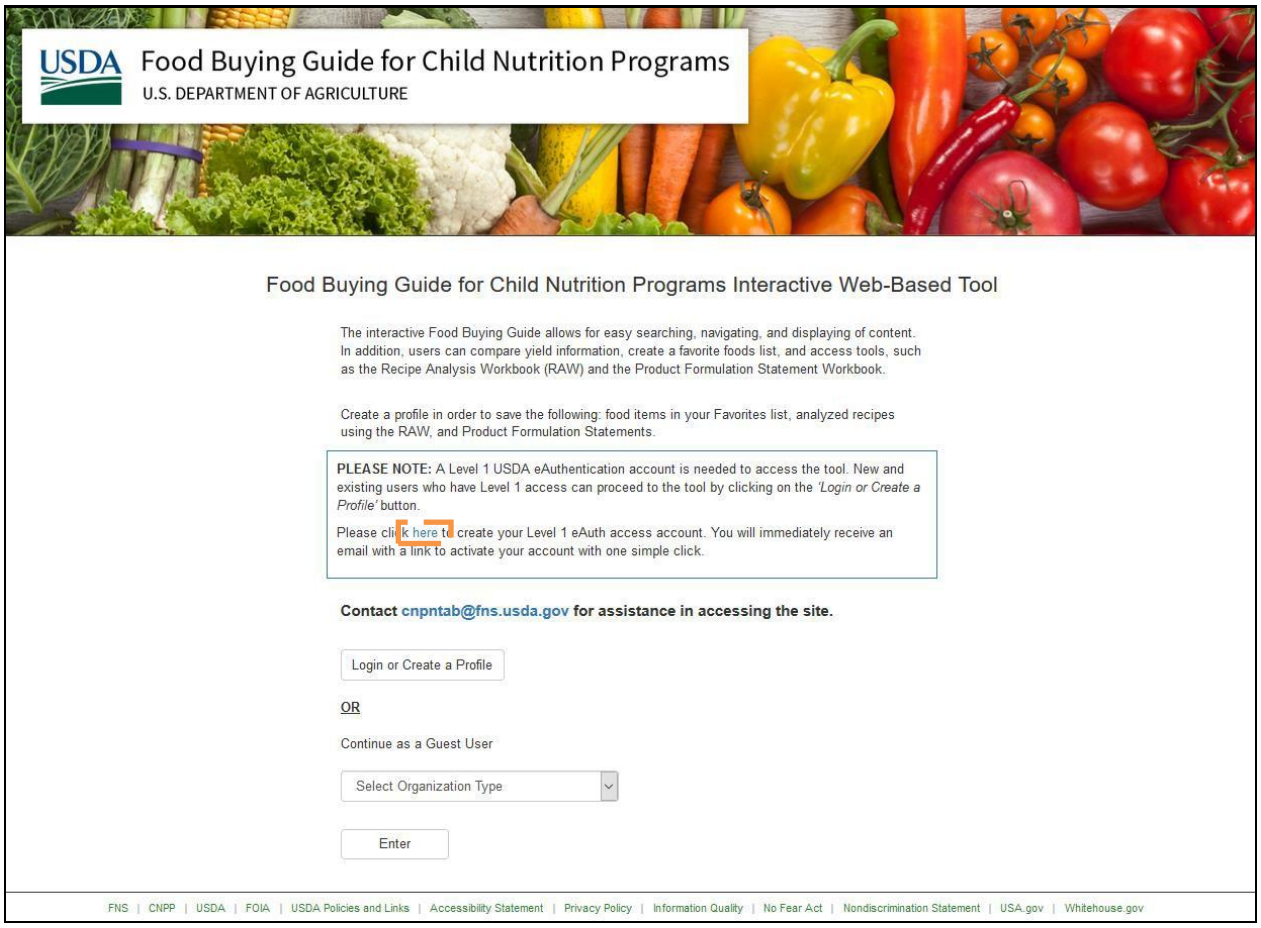
1. Items saved to Favorites will be retained for the Registered User.
2. Recipe Analysis Workbook is available to Registered Users with Organizations other than Vendor.
3. Product Formulation Statement is available to Registered Users with Organization set to FNS National Office, FNS Regional Office, and Vendor.

3.1 Logging In

3.1.1 Requirement – Level 1 USDA eAuthentication Account

A Level 1 USDA eAuthentication account is needed to access the tool as a registered user.

To create a new Level 1 USDA eAuthentication account, follow the instructions available inside the box as shown on the screenshot below. The link provided on screen will take you directly to register for a new Level 1 eAuthentication account.

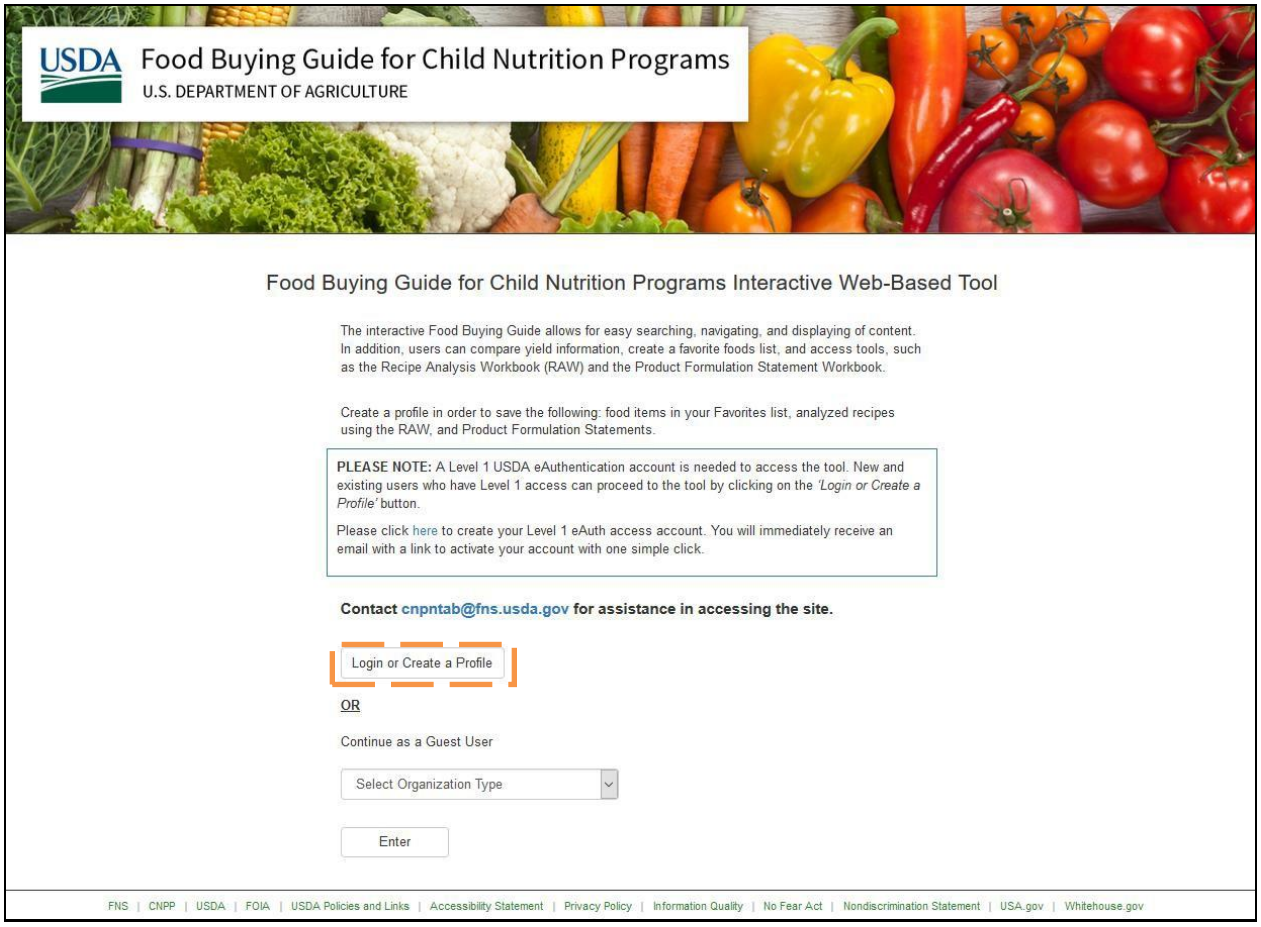


3.1.2 Logging In with eAuth

When navigating to the FBG URL, a User will first see the login screen. Users who have a Level 1 USDA eAuthentication account can proceed to the site by clicking on the "Login or Create Profile" button.

The "Login or Create a Profile" button will direct the user to the eAuthentication login screen to enter his/her eAuthentication credentials.

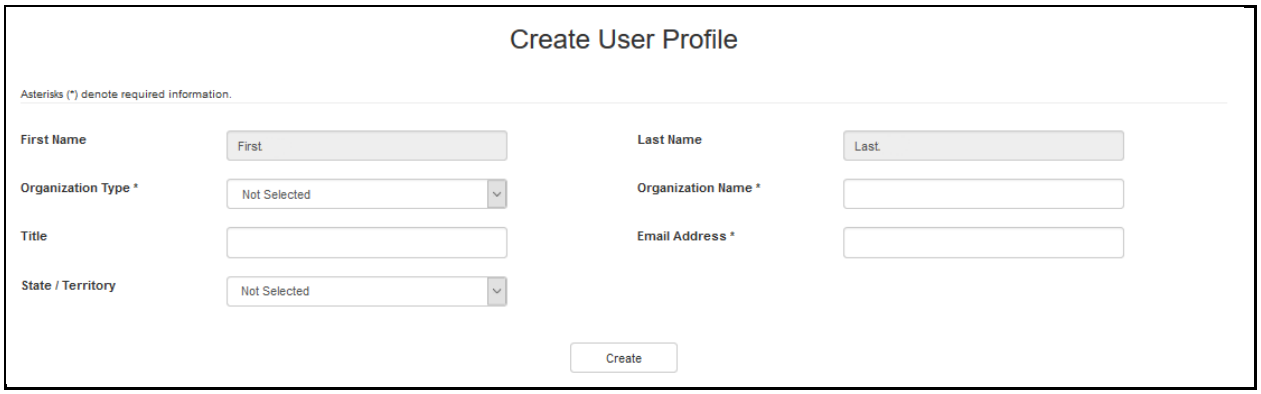
If the user has not used the Food Buying Guide application before, he will be prompted to create a user profile as described in section 3.1.3.



3.1.3 New FBG Users – Create a User Profile

The user will be prompted to create a user profile when first accessing the FBG tool as an authenticated user. Name and email fields will be automatically pre-populated with information tied to the user's eAuthentication account, so these fields will be grayed out and will not be editable.

The other required field is the Organization Type and the user will need to select one of the following options: FNS National Office, FNS Regional Office, Vendor, State Agency, School, Child Care, or Other. If Vendor or Other is selected, the user will be prompted to enter an Organization Name. Vendors will also have the capability to include a company profile and upload company letterhead to be used for the Product Formulation Statement.



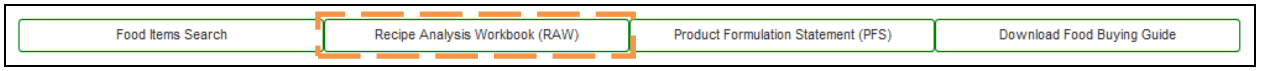
3.2 Home Screen Buttons

Food Items Search and Download Food Buying Guide home screen buttons for a Registered User work the same as for a Guest User.

3.2.1 Recipe Analysis Workbook (RAW)

The Recipe Analysis Workbook (RAW) is a tool to help you determine your recipes' expected meal pattern contributions. This tool contains series of tabs with formulas for each food group. The RAW is not a tool to evaluate dietary specifications for calories, sodium, and saturated fat. It also cannot determine whether the serving size information entered is correct for crediting.

Click the “Recipe Analysis Workbook (RAW)” button.



> ***NOTE:*** This functionality is only available to Authenticated Users who have selected Organization other than “Vendor.”

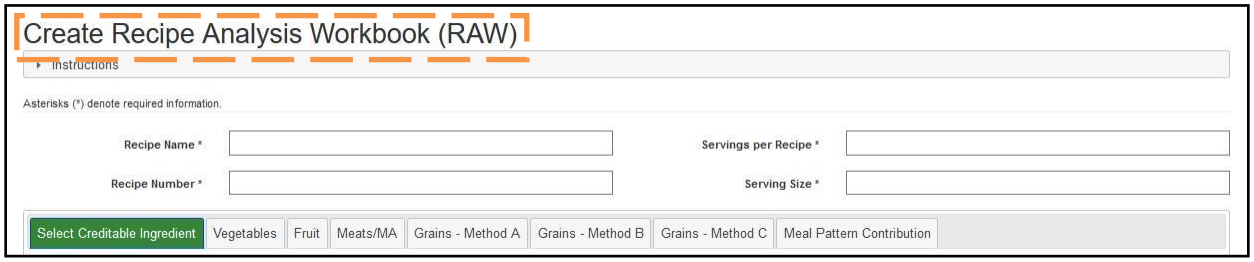
The Recipe Analysis Workbook can also be accessed by selecting “My RAW Recipe List” under the Tools menu on the tool bar.

Click “Create Recipe Analysis Workbook” button to create a RAW.

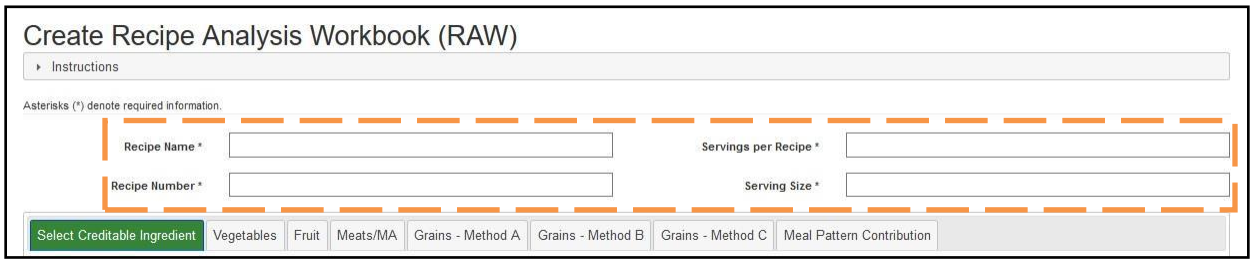
Use the links in the Actions column for an existing RAW:

- Edit – to change or update information previously entered in RAW document
- Delete – permanently remove RAW document
- PDF – generate, view, and save a PDF of the RAW
- Text – generate, view, and save Meal Pattern Contribution of the RAW as text
- Email – generate RAW PDF and email it to one or more recipients.

Click "Create Recipe Analysis Workbook" button and Create School Recipe Analysis Workbook screen will be displayed:



User must enter information in all the required RAW header fields (Recipe Name, Recipe Number, Servings per Recipe, and Serving Size for the RAW).



A RAW can include ingredient(s) for one or more meal components, and each meal component has a separate tab in the RAW.

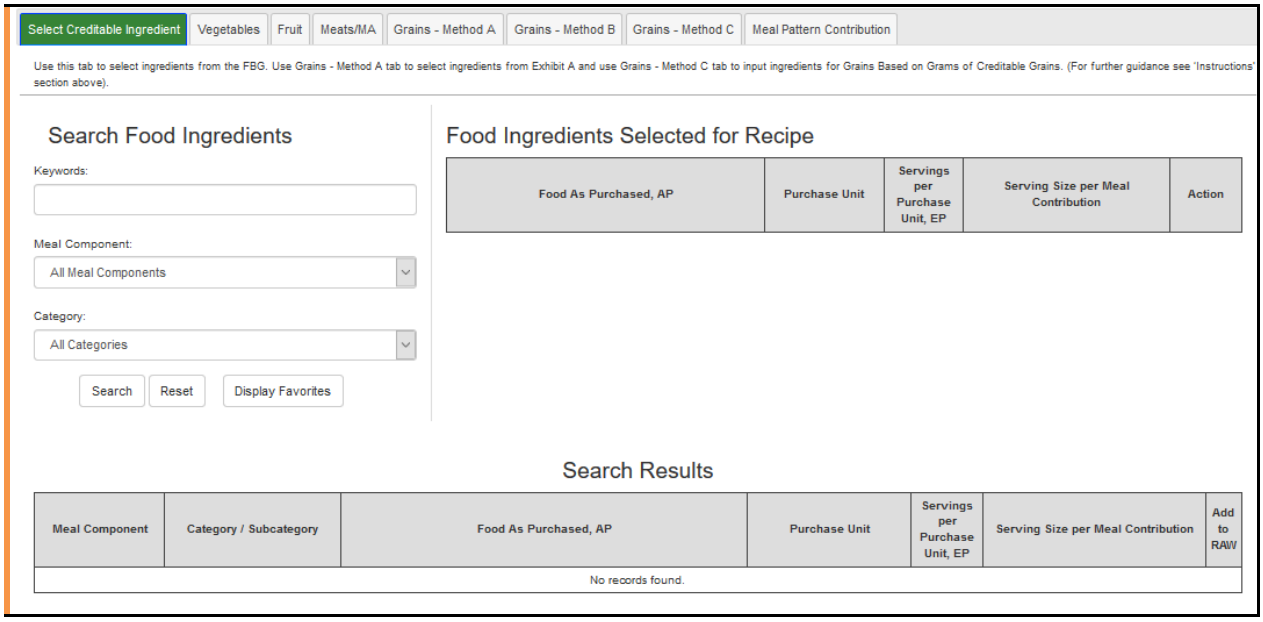
Please note there are three methods to calculate meal pattern contribution for grains:

- Method A – based on Exhibit A – Go to this tab to search and select ingredients from Exhibit A
- Method B – based on Food Buying Guide – This tab will automatically populate if food ingredients are selected from the search below.
- Method C – based on Grams of Creditable Grains – Go to this tab to manually enter grain ingredients.

3.2.1.1 Food Items in Vegetables, Fruit, Meats/MA, and Grains – Method B

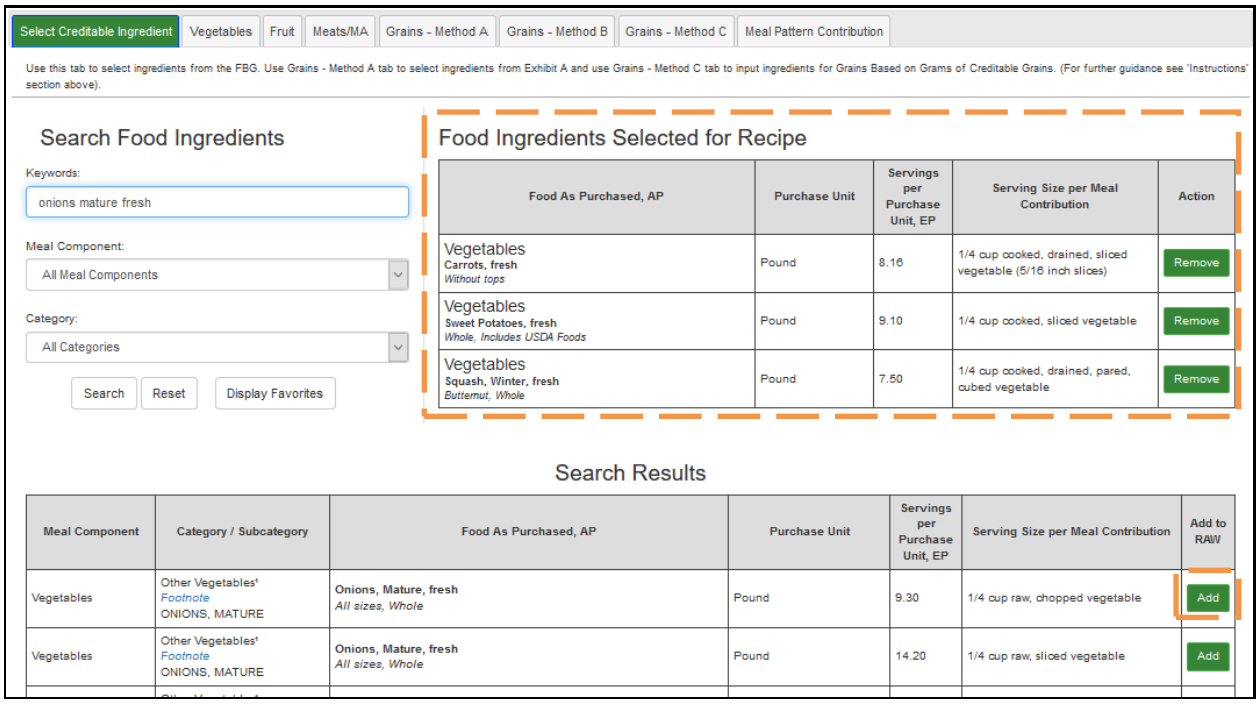
The Select Creditable Ingredient tab has search controls that allow the user to locate food items within Vegetables, Fruit, Meats/Meat Alternatives, and Grains (used for Method B crediting).

Search and select only the recipe food ingredients that contribute to the meal pattern. It is important to select the correct form of the ingredient (fresh, frozen, etc.) from the Food Buying Guide (FBG). If an exact match is not available, choose a food item in the FBG that closely matches your recipe ingredient.



Users can search for food item by entering one or more keywords, and/or selecting a Meal Component and/or Category. Search results are displayed in a table, paginated. Once the food

item has been located, click the corresponding "Add" button to populate that food item into the RAW.



Users can also add ingredients to the RAW from their Favorites using the Display Favorites button. Once Display Favorites button is pressed, the Search Results table is populated with this user's Favorite food items that are allowed to be used in a RAW.

Once a food item has been added, if it is no longer needed, the users can use the corresponding "Remove" button to remove the food item from the list of ingredients.

Once the ingredients have been added, they can be viewed on the corresponding tabs of the RAW. Some of the food item information will be pre-populated from the Food Buying guide; some of the pre-populated information (such as the Purchase Unit) will be editable. The user may edit certain fields if s necessary. The Calculated Quantity to Purchase will calculate automatically for each food item once Quantity of Ingredient (required) and Preparation Yield (optional) have been entered.

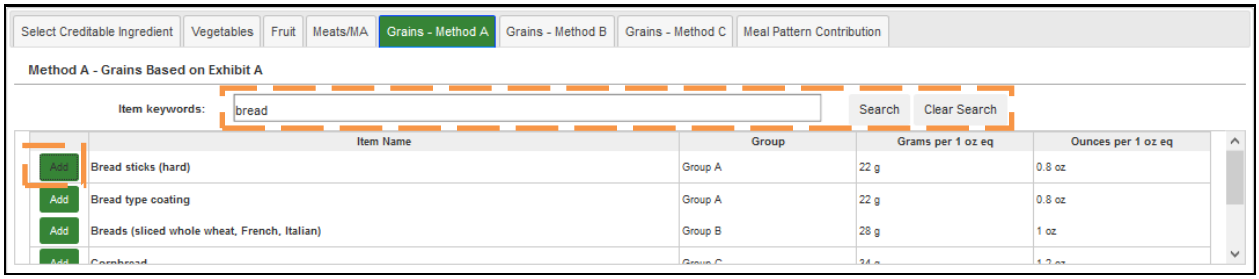
Enter quantity of ingredient in the same unit as the Purchase Unit. If the recipe lists the ingredients in a different unit, you will need to convert the quantity to match the FBG. For example, convert ingredients measured in ounces to their decimal equivalent of a pound. See Table 5 Decimal Weight Equivalents.

Record the yield factor in "Preparation Yield factor found in the "Additional Information" Column for any ingredients that need to be converted to match the form of the item as listed under "Food as Purchased, AP" Column.

Display of information on Vegetables, Fruit, Meats/Meat Alternates, and Grains – Method B tabs is very similar with small differences. Vegetables tab displays food items separated by vegetable sub-group while on other tabs food items are displayed together; Grains – Method B tab does not have the Preparation Yield controls.

3.2.1.2 Grains – Method A

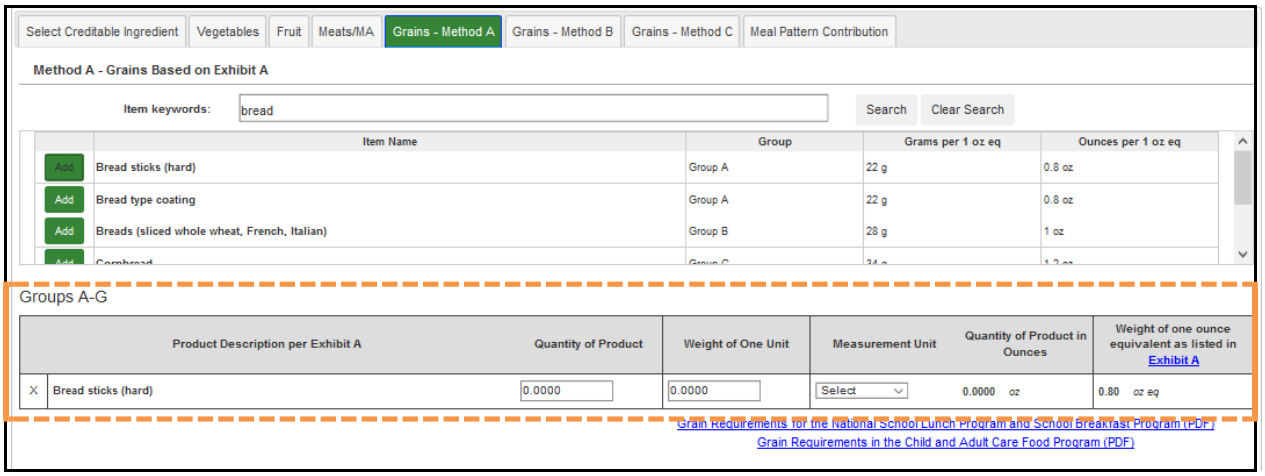
Grains – Method A tab is based on food items found in Exhibit A. It has a search control that allows the user to locate food items within Exhibit A.



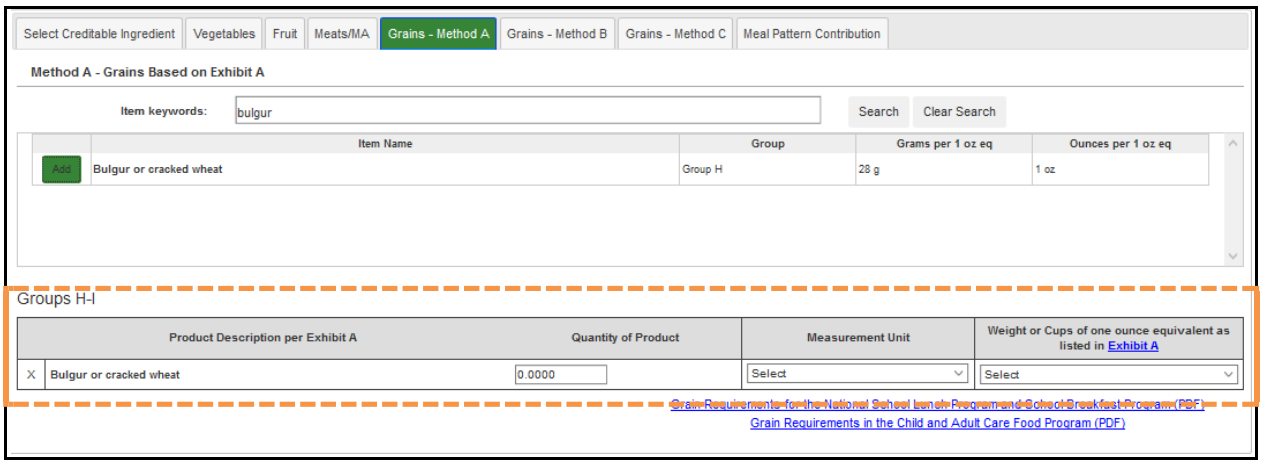
Users can search for food item by entering one or more keywords. Once the food item has been located, click the corresponding "Add" button to populate that food item into the RAW.

Only Product Description will be pre-populated from the Exhibit A, and the user will need to edit the other fields.

For food items in Groups A-G, enter Quantity of Product and Weight of One Unit, and proceed to select the appropriate Measurement Unit (oz. or gm) from the drop-down menu. The Quantity of Product in Ounces and the Weight of One Ounce Equivalent as listed in Exhibit A will auto calculate/populate.



For food items in Groups H-I, enter Quantity of Product, select the appropriate Measurement Unit (oz., gm., or cup(s), and proceed to select the Weight or Cups of One Ounce Equivalent as listed in Exhibit A from the drop-down menu.

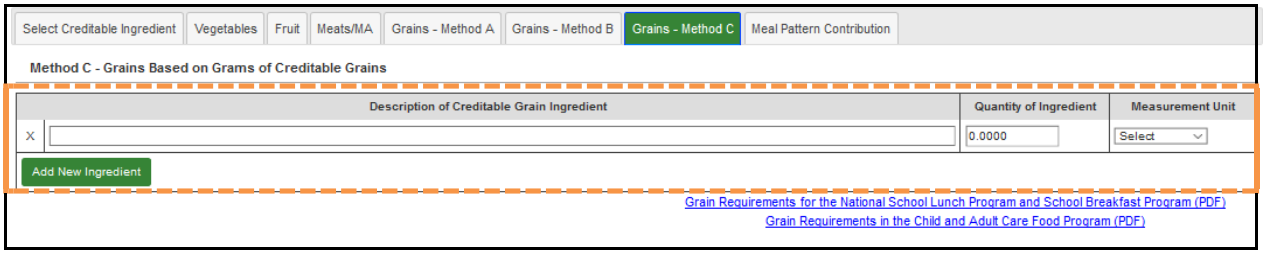


Meal Pattern Contribution value will calculate automatically as all appropriate fields are filled in.

If a food item is not needed the users can use the corresponding “X” button to remove the food item from the list of ingredients.

3.2.1.3 Grains – Method C

Grains – Method C tab is based on grains food items entered manually. You can add food items using "Add New Ingredient" button.



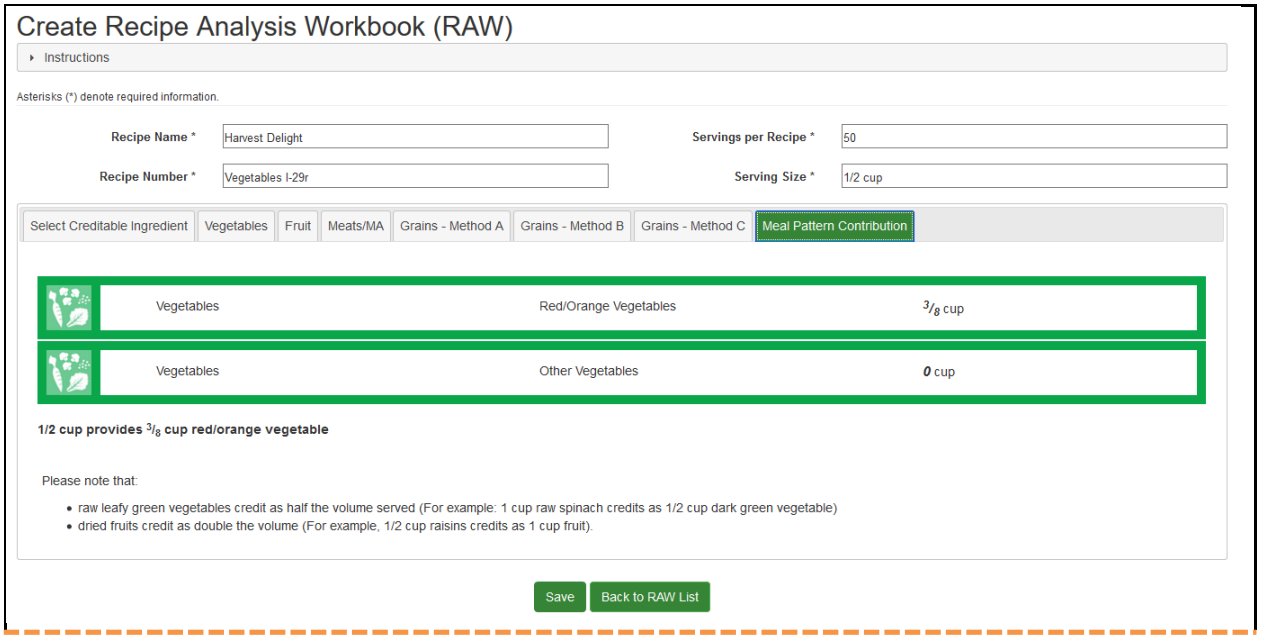
Enter the description of creditable grain ingredient and quantity of ingredient, then select the measurement unit. The Meal Pattern Contribution value will calculate automatically.

If a food item is not needed the users can use the corresponding "X" button to remove the food item from the list of ingredients.

3.2.1.4 Meal Pattern Contribution Statement

The Meal Pattern Contribution tab of the RAW contains a generated meal patterns contribution statement for the product based on the information entered by the user.

> ***NOTE***: You must enter Serving Size per Recipe and Serving Size for your RAW for Meal Pattern Contribution tab to populate correctly.

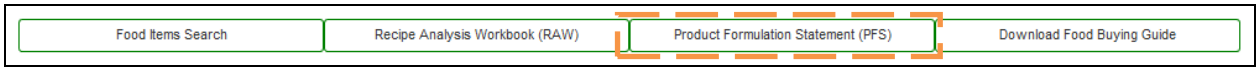


Use "Save" button at the bottom of the Create/Edit RAW page to save your RAW at any point. Use "Back to RAW List" button to return to the RAW List screen.

> ***NOTE***: "Back to RAW List" button does not save any information, so please be sure to save any changes before pressing it.

3.2.2 Product Formulation Statement (PFS)

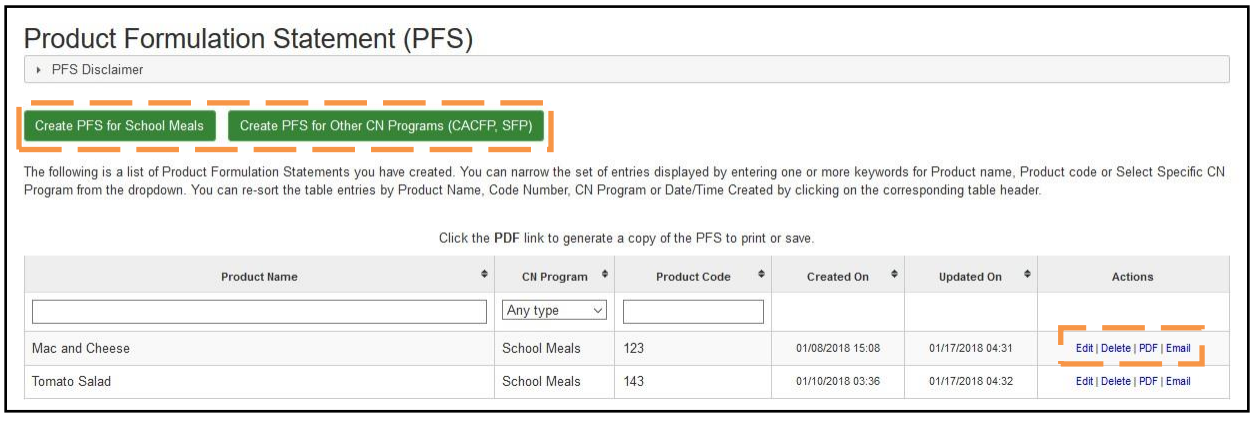
Click the "Product Formulation Statement (PFS)" button on FBG main screen to access Product Formulation Statement functionality.



> ***NOTE:*** This functionality is only available to Authenticated Users who have selected Organization of "Vendor," "FNS National Office," or "FNS Regional Office."

The Product Formulation Statement can also be accessed by selecting "My PFS List" menu on the tool bar.

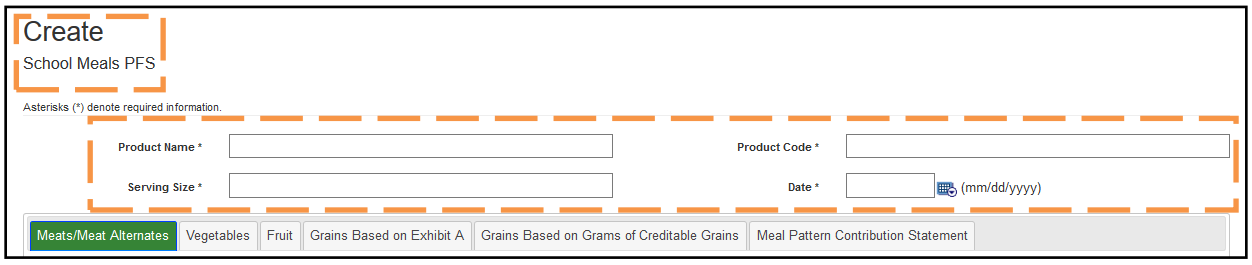
Click "Create PFS for School Meals" or "Create PFS for Other CN Programs (CACFP, SFP)" button to create the corresponding type of the PFS.



Use the links in the Actions column for an existing PFS:

- Edit – to change or update information previously entered in PFS document
- Delete – permanently remove PFS document
- PDF – generate, view, and save a PDF of the PFS
- Email – email a PDF format of the PFS document to one or more email addresses

Click "Create PFS for School Meals" or "Create PFS for Other CN Programs (CACFP, SFP)" button and Create School Meals PFS of Create PFS for Other CN Programs (CACFP, SFP) screen will be displayed:

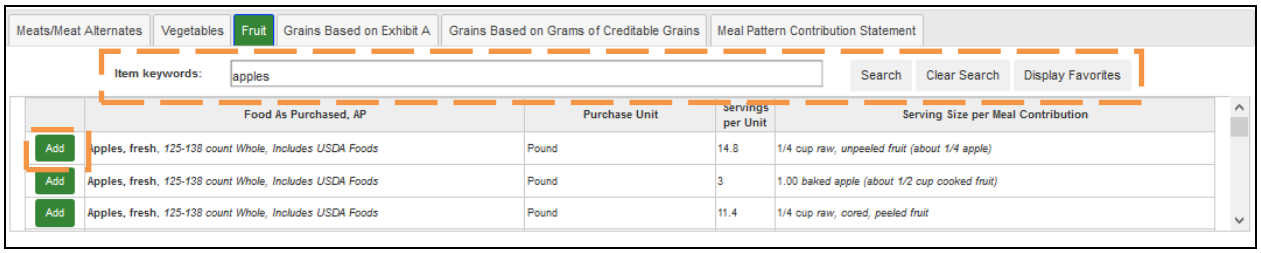


User must enter information in all the required PFS header fields (Product Name, Product Code, Serving Size, and Date for the PFS).

3.2.2.1 Adding ingredients to a PFS

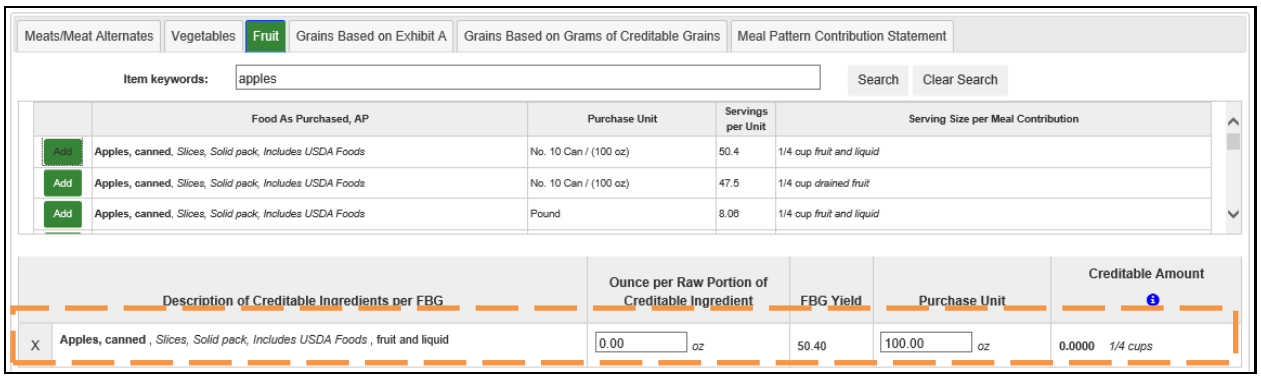
A PFS can include ingredient(s) for one or more meal components, and each meal component has a separate tab in the PFS. Each tab has a search control that allows the user to locate food items within that given meal component (ex. the Fruit tab's search control will locate only fruit items).

> ***NOTE***: Food Items for Further Processing will appear in searches in Meats/Meat Alternates and Vegetables tabs.



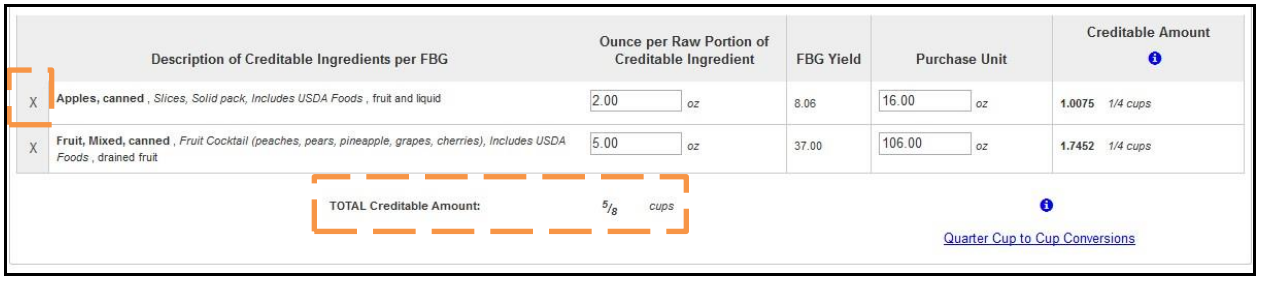
Users can search for food item by entering one or more keywords. Once the food item has been located, click the corresponding "Add" button to populate that food item into the PFS.

Users can also add ingredients to the PFS from their Favorites using the Display Favorites button. Once Display Favorites button is pressed, the Search Results table is populated with this user's Favorite food items that are allowed to be used in a PFS for the Meal Component selected.



Some of the food item information will be pre-populated from the Food Buying guide; some of the pre-populated information (such as the Purchase Unit) will be editable. The user may edit certain fields if s necessary. The Creditable Amount will calculate automatically.

If a food item is not needed the users can use the corresponding "X" button to remove the food item from the list of ingredients.



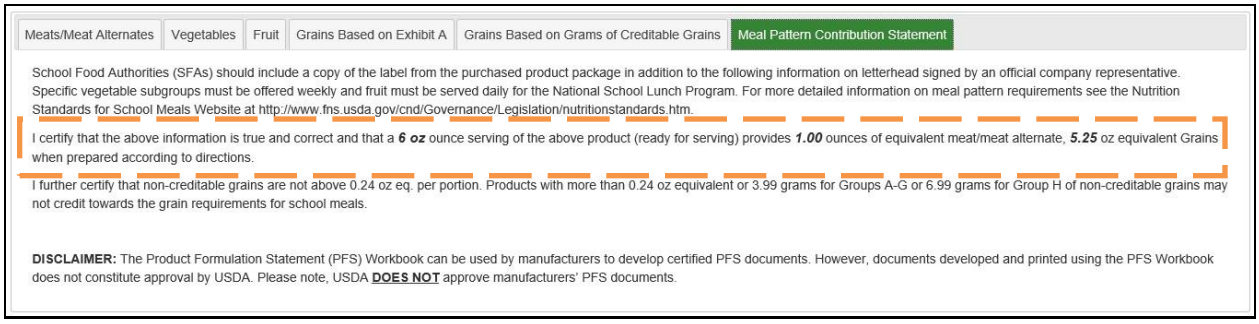
Display of "Creditable Amount" differs per meal component tab as follows:

- Meats/Meat Alternates tab contains three separate tables for Meats, Meat Alternates, and Alternate Protein Product. Meats and Meat Alternates food should be located using search, APP should be entered manually. Creditable Amount totals are displayed per food item, per table, and grand total.
- Vegetables tab – food items should be located using search. Creditable Amount totals are displayed per food item; for School PFS – per vegetable sub-group; for Other PFS – the grand total.
- Fruit tab – food items should be located using search. Creditable Amount totals are displayed per food item and grand total.
- Grains Based on Exhibit A tab – food items should be located using search. Creditable Amount totals are displayed per food item and grand total.

- Grains Based on Grams of Creditable Grains tab – food ingredient must be entered manually and the user must select the appropriate group within Exhibit A that represents the end product. For example, if the user is making whole wheat bread and enters whole wheat flour as the food ingredient, then Exhibit A group B should be selected, since whole wheat bread is the end product. A link to Exhibit A is available for reference to assist in guiding you to select the appropriate group. Creditable Amount totals are displayed per food item and grand total.

3.2.2.2 Meal Pattern Contribution Statement

The Meal Pattern Contribution Statement tab of the PFS contains a generated meal patterns contribution statement for the manufacturer's product based on the information entered by the user.



Use "Save" button to save your PFS at any point. Use "Back to PFS List" button to return to the PFS List screen.

> ***NOTE***: "Back to PFS List" button does not save any information, so please be sure to save any changes before pressing it.

3.3 Top Navigation Menus

In addition to navigating through FBG from the main screen, users can use the Top Navigation menus to access functionality within the site. Please refer to section 2.4 for more details on the Navigation menus available to the user. In addition to the menus already discussed in section 2.4, registered users will see the following:

3.3.1 User Greeting

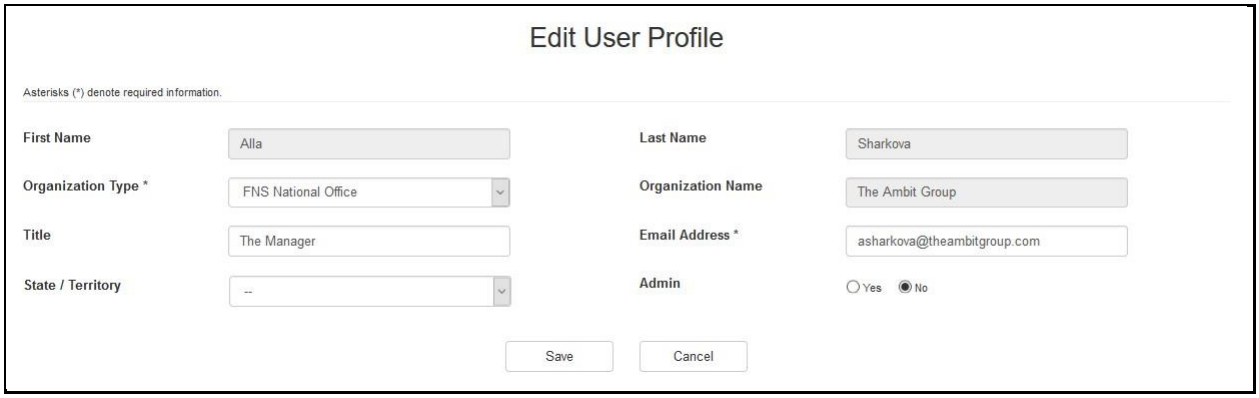
User's name, as entered for the user profile, will be displayed in the "Welcome" FBG menu.

3.3.2 My Profile

Use "My Profile" under "Welcome" menu to view and edit your profile information.

3.3.2.1 Manage User Profile

On the View User Profile screen, you can view information that was previously entered or use "Edit" button to edit information found in the profile. The users can make any desired changes and then click on the "Save" button. The "Cancel" button returns the user to his/her profile.



3.3.2.2 Manage Company Profile

Users with *Vendor* selected as the Organization type will be prompted to enter their company information. Company Profile information will be displayed on View User Profile screen under user profile information section. It can be edited along with user's profile information as described above.

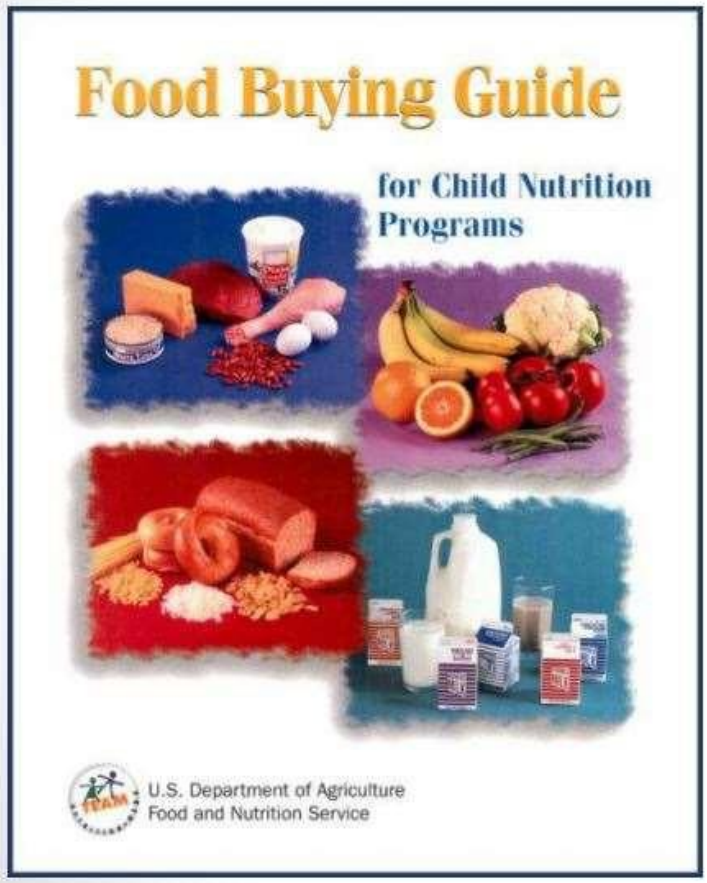
3.3.3 Log Out

By clicking "Log Out," the Authenticated User's session ends. Any saved information (Recipes, Favorites, PFS) is stored for later availability.

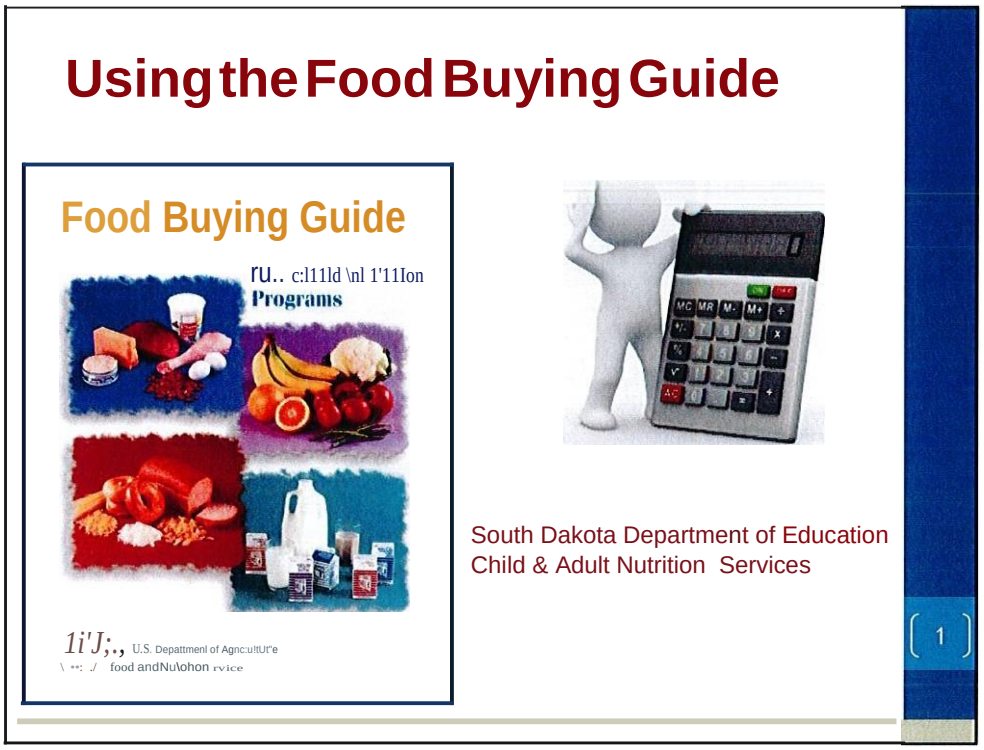
Food Buying Guide Cover

Can be found here: http://doe.sd.gov/cans/documents/UsingFdByngGd.pdf

Using the Food Buying Guide



South Dakota Department of Education
Child & Adult Nutrition Services



Good day,
The following presentation will focus on how to use the Food Buying Guide. The food buying guide is one of things a menu planner or food service manager will want to get acquainted with.

The FBG is a good resource for figuring out how much food you need to buy for the numbers you are serving. The yield information represents average yields based on research conducted by USDA. The yield information provided for a specific food is meant to be used as a planning and production tool.

Section 1- meat/meat alternate - this is where you will find your ground beef, beef roast, pork, beans that you want to count as a meat this will show servings of fresh, frozen meat, poultry, fish. Some food items will say "includes USDA Foods" So you can use those if you are using the USDA Food item Items like chicken, beef, pork nuggets & patties are not provided in the FBG because they do not have a required standard of identi fy. If you use any of these types of products, you must obtain a CN label or product specification sheet to show how that item meets requirement s for the meal patt ern .

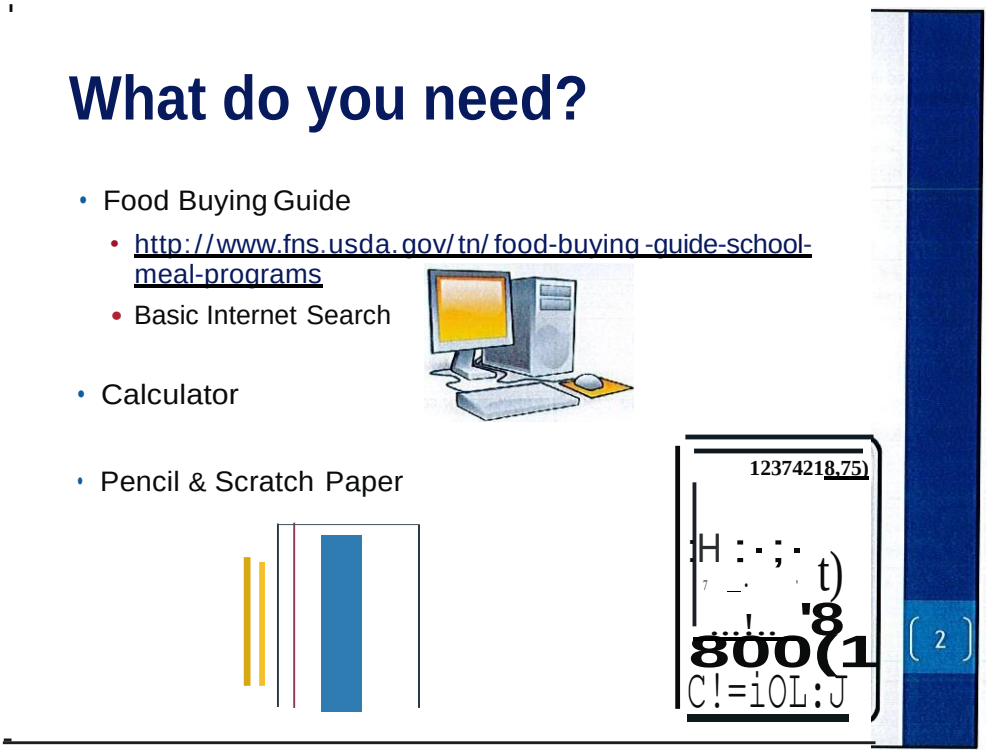
Section 2 - Vegetables and Fruits - remember that USDA has separated out the vegetables from the fruits. Previously they were all combined together but now that we have vegetable subgroups all are listed with the subgroup they belong in. Many fruits and vegetables have fresh, canned, frozen, dehydrated and are listed alphabetically. Yields will be in Y. cups serving unless otherwise noted. Note some soups are credited only a Y. cup veg per one cup. For example, if you served 1 cup tomato soup you could count it as Y. cup vegetable in the red/orange subgroup.

Section 3 - this is the grain/bread section -you will find your pasta, rice, cereal grains, and the grain/bread chart in this section.

Section 4 - Milk - This section contains a list of fluid milk available and their updated product names

Section S – Other Foods - the foods in thi s section do not meet the requirement for any component in the meal patterns. These items are included since they are often used as condiments and seasonings to

improve acceptability and customer satisfaction of the meal. Remember that any of these foods served will count toward the nutrition standards unless they are something that is purchased. Many of these foods are high in salt, sugar or fat so you will want to be careful how you use them in menu planning.

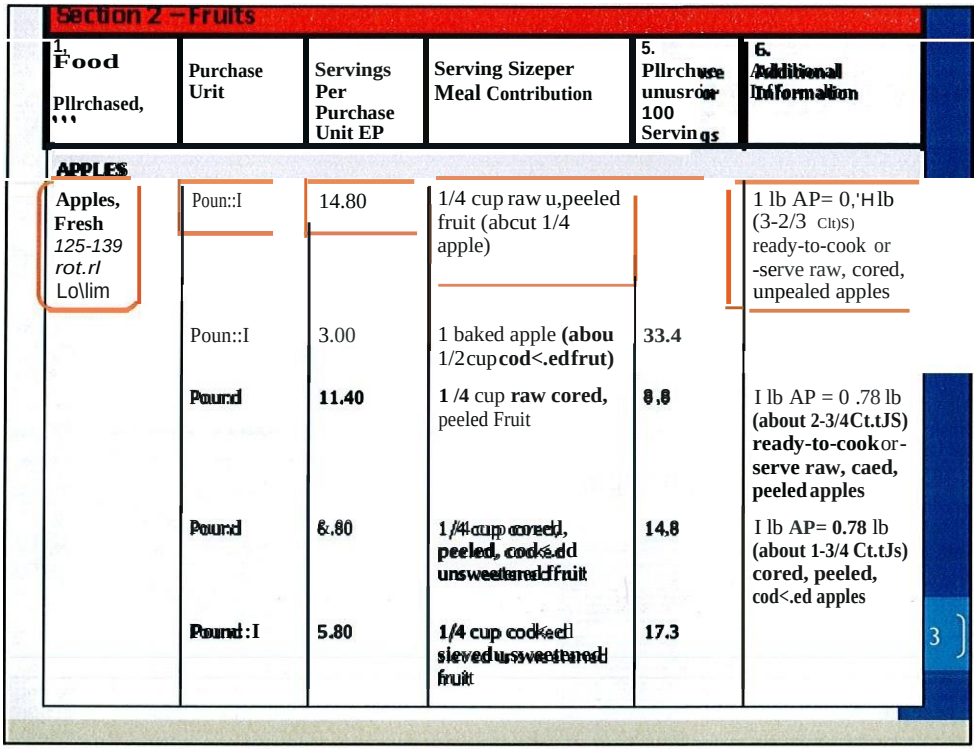


Before we get start ed, make sure you have these things on hand -

Food Buying Guide - The entire food buying guide can be found by following the link provided, however, a simple internet search for 'Food Buying Guide ' will yield the same results.

Calculator - We will beusinga calculator based on figures provided in the food buying guide

Pencil and Scratch Paper - Have a pencil and scratch paper handy, just in case.



Section 2 – Fruits

1. Food Pllrchased, '''	Purchase Urit	Servings Per Purchase Unit EP	Serving Sizeper Meal Contribution	5. Pllrchuse unusror 100 Servings	6. Additional Information
APPLES					
Apples, Fresh *125-139 rot.rl* Lo\lim	Poun::I	14.80	1/4 cup raw u,peeled fruit (abcut 1/4 apple)		1 lb AP= 0,'H lb (3-2/3 Ct)S) ready-to-cook or -serve raw, cored, unpealed apples
	Poun::I	3.00	1 baked apple **(abou** 1/2cup**cod<.edfrut)**	**33.4**	
	Pour:d	**11.40**	**1 /4** cup **raw cored,** peeled Fruit	**8.8**	I lb AP = 0 .78 lb **(about 2-3/4Ct.tJS) ready-to-cook** or- **serve raw, caed, peeled apples**
	Pour:d	**&.80**	**1/4 cup cored, peeled, cod<.dd unsweetaredfruit**	**14,8**	I lb **AP= 0.78** lb **(about 1-3/4 Ct.tJs) cored, peeled, cod<.ed apples**
	Pound:I	**5.80**	**1/4 cup codked sieved unsweetaned fruit**	**17.3**	

Let's take a look at one of the pages in your FBG reference materials.

Notice that there are columns across the top and are numbered 1-6. all foods are arranged in alphabetical order.

Column 1 is the food as purchased so when we are looking at apples on this page we see different sized apples, the yield changes a little with each different size. The FBG is an ESTIMATE and not an exact measurement.

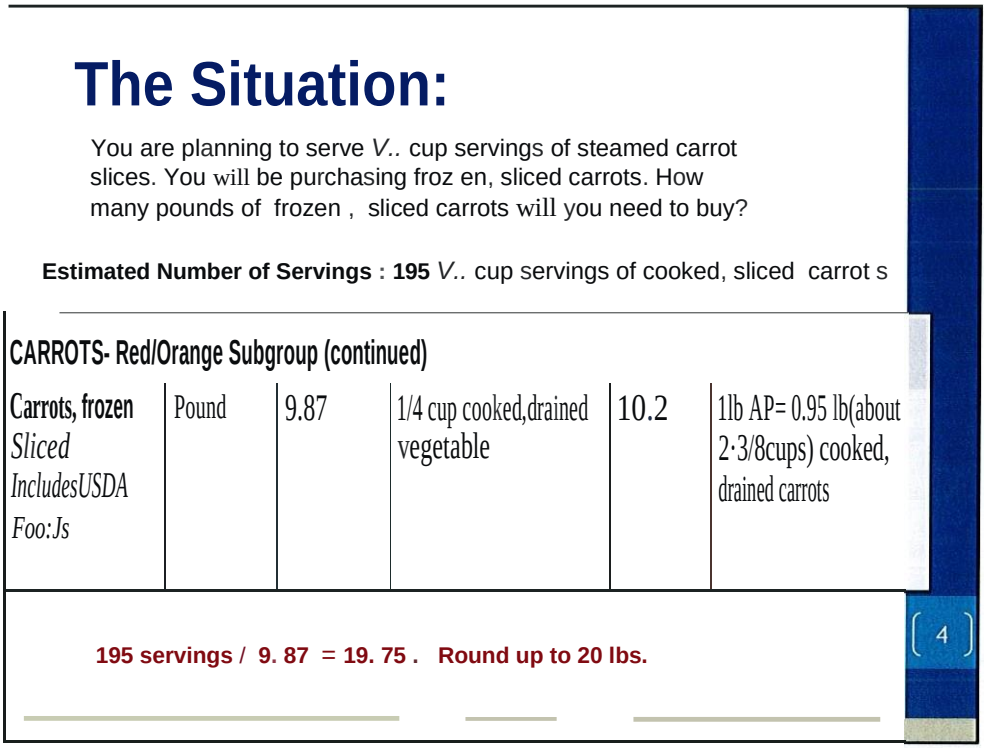
Column 2 - Purchase unit - the purchase unit is generally given as either a pounds, #10 can, or smaller can sizes.

Column 3 - Servings per purchase unit (EP) edible portion- this column shows the number of X cup servings you would get from each purchase unit. In the meat/meat alternate it would show the number of 1 or 1.5 oz eq lean meat servings you would get from each purchase unit

Column 4 - Serving size per meal contribution - in the case of the apples the X cup is the serving size that counts toward the component contribution for fruit. Cups are also displayed for vegetables. For meat/meat alternate it would be recorded in 1 oz eq or 1.5 oz equivalent. We will learn more about how to use this column in just a few minutes

Column 5 - Purchase units for 100 servings - this column shows the number of purchase units you need for 100 servings of the corresponding serving size listed in column 4. For example, if you were planning to serve 100 - X cups of raw unpeeled apples (or about 1/4 of an apple) you would need 6.8 pounds of fresh apples (125-138 count).

Column 6 -Additional information - this column gives other information to help you calculate the amount of food you need to prepare meals. It shows the amount of raw, cored, unpeeled apples that you would get from one pound of apples.



The situation states that you plan to serve X cup of steamed carrot slices. You will purchase frozen sliced carrots. How many pounds of frozen sliced carrots will you need to buy?

1. You need to estimate the number of X cup servings you will need. In this case it is 195 X cups of cooked sliced carrot s.

2. Next, Find the food in the FBG in the form you intend to ser ve. Carrot s, frozen, sliced can be located in the vegetable food buying guide. The snippet is displayed for your convenience.
3. There is only one selection for the frozen sliced. We want to choose the one that is cooked, drained vegetable . Since you are using the serving size of X cup you do not need to do any other math.
4. Look at column 2 for the purchase unit - this is the unit you will be purchasing the product in - pounds. Look at column 3 for the number of servings you will get from each pound of the frozen sliced carrots. 9.87 X cups per pound.
5. (click) Divide the number of servings needed by the number of servings you will get per the purchase unit.

195 servings needed divided by 9.87 = 19.75 #. Always round up to the whole amount of a purchase unit to ensure enough food is availab le. Most likely, we will not be able to buy quarter pounds of frozen sliced carrots; we would need 20# of the frozen sliced carrots.

The Situation:

You are planning to serve boneless, cooked roast beef to 75 students of different grade level s. How many pounds of raw beef roast , without bone, will you need?

Estimated Number of Servings: 45 1.5 oz eq servings + 30 2 oz eq servings

BEEF ROUND ROAST, fresh or frozen[9]

Beef Round Roast, fresh or frozen' *Withoutbone*	Pound	9.76	1oz cooked leanmeat	10.3	1lb AP= 0.61lbcooked lean meat
1/4-inchtrim	Pound	6.50	1-1/2 oz cooked lean meat	15.4	

45 at 1.5 oz = 67.5 oz
30 at 2 oz = 60.0 oz
Total= 127.5 oz needed

1 lb = 9.761 oz servings

127. 5 / 9.76 = 13.06 lbs.
Round up to 13. 25 lbs needed

5

1. **Find** the beef round roast without bone in the Meat/Meat Alternate section -you always want to choose the one as it will be served
2. Check the serving sizes listed and compare these to your planned serving sizes. There is both a 1 ounce and a 1.5 oz cooked lean meat
3. You will need to calculate the total ounces of cooked lean meat needed So...

(click)
45 at 1.5 oz= 67.5 oz
30 at 2 oz = 60.0 oz
Total= 127.5 oz needed

Since this is now in units of one ounce you can now use the serving size of **one ounce** cooked lean meat

Column 2 refers to the purchase unit which you will be purchasing this meat in pounds and column 3 for the number of serving you will get from the purchased unit or 1 pound. 9.76 1 oz serving per# (click)

So again, we can divide the total number of ounces we need by the number of serving we will get from the purchase unit.

(Click)

127.5 divided by 9.76 = 13.06# Round up to the nearest quarter 13.25# of the raw beef round roast without bone is needed for the required serving sizes for the 75 people you are serving.

The Situation:

You are planning to serve 1. 5 oz eq portions of cooked ground beef for 60 people. How many purchase units of frozen, ground beef, USDA Commodity, not more than 20% fat, do you need to buy?

Estimated Number of Servings: 60 1. **5 oz eq portions**

Beef, Ground, **fresh or frozen'·"** *no more than 20% fat Includes USDA Foods (Like IMPS # 136)*	Pound	11.80	1 oz cooked lean meat	8.5	1 lb AP = 0.74 lb coo ked, drained lean meat
	Pound	7.89	1-1/2 oz cookedlean meat	12.7	

1 lb= 7.89 1. 5 oz eq servings

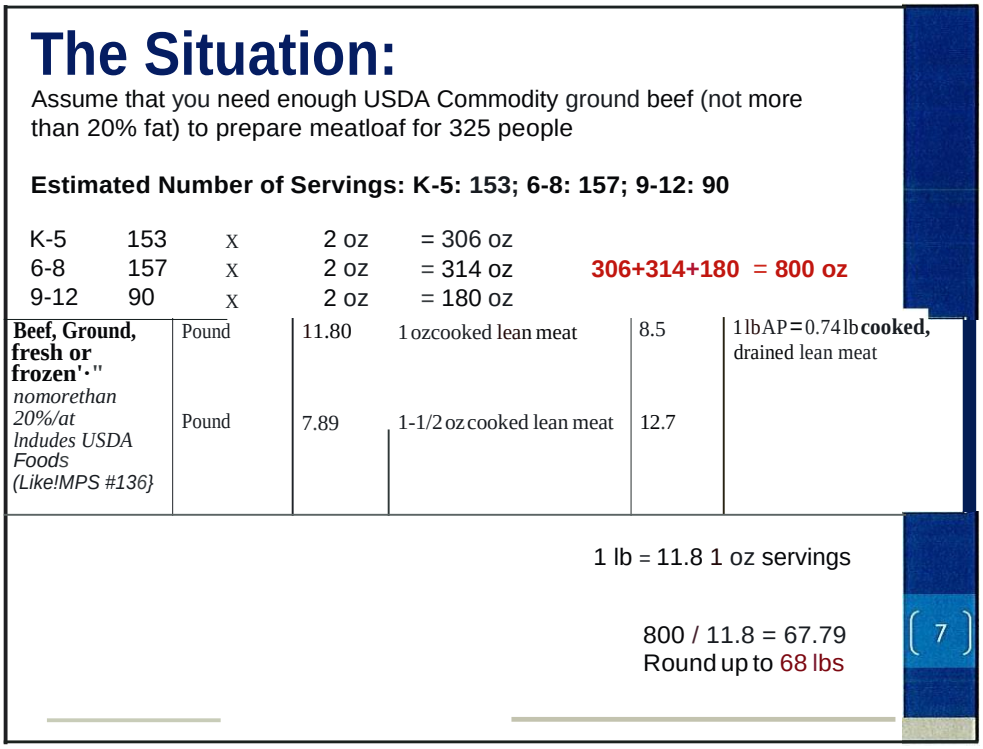
60 / 7.89 = 7.60 lbs.
Round up to 7. 75 lbs needed

Locate the product in the food buying guide. Since our serving size is 1.5 oz eq, and the food buying guide has this serving size as a Serving Size option, no conversion is needed.

We can clearly see that 1 lb of ground beef provides 7.89 1.5 oz eq servings (click)

The next step would be to divide the number of servings needed (60) by the number of servings per purchase unit (7.89). (click)

60 divided by 7.89 gives us 7.60. Round to to 7.75 lbs.



Assume that you need enough USDA Commodity ground beef (not more than 20% fat) to prepare meatloaf for 325 people

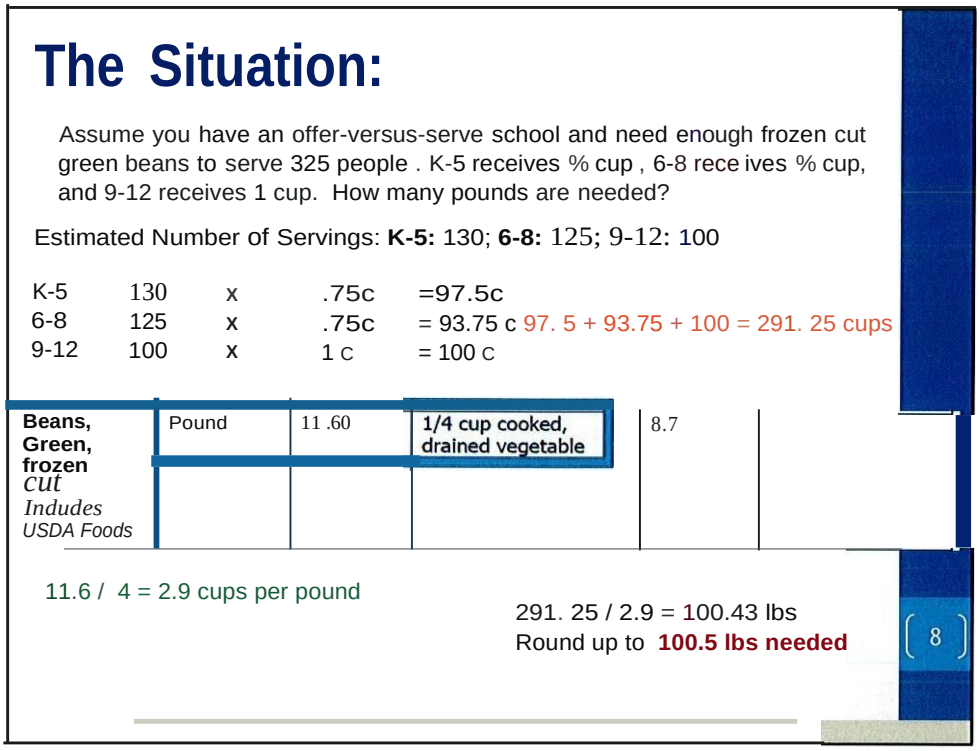
The estimated number of servings are **K-5: 153; 6-8: 157; 9-12: 90**

Multiply the total number of servings expected to be taken by each grade group by the serving size to determine the amount you need

After adding together the ounces needed per grade group, we can see that we would need 800 total ounces.

We can see that 1 lb of ground beef contains 11.8 1oz servings. Since this is all in 1 ounce form, we can take 800 total ounces/ 11.8 to determine the number of pounds needed.

67.79 lbs would be needed. Let's round up to 68 lbs.



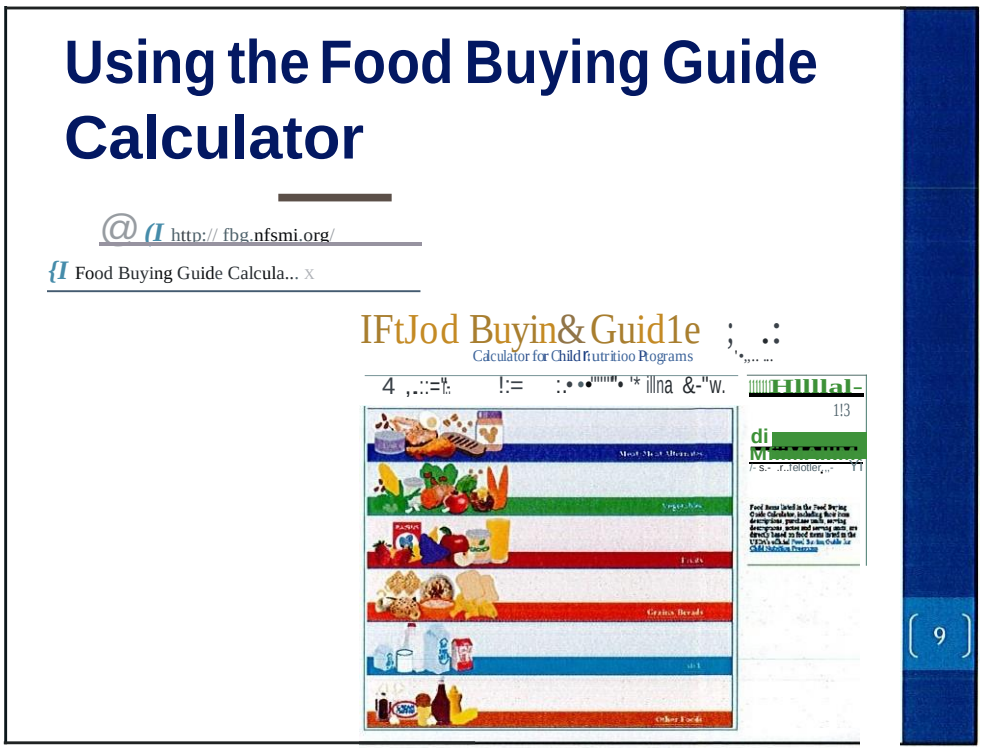
Assume you have an offer-versus-serve school and need enough frozen cut green beans to serve 325 people. K-5 receives% cup, 6-8 receives% cup, and 9-12 receives 1 cup. How many pounds are needed?

We have estimated servings of **K-5: 130; 6-8: 125; 9-12: 100**

We will take the serving size per grade group and multiply by the number of servings. We will dothis for each grade group, and then add our result s. We add 97.5 (from K-5) + 93.75 (from 6-8) + 100 (from 9-12) to come up with a total of 291.25 cups needed . (click)

The food buying guide tells us that 1 lb of frozen green beans provides 11.60 X c servings **(click).** In order to make our division work, we need to divide 11.6 by 4 to convert the serv ings in the food buying guide to cup form. This is done to match the food buying guide with total number of cups we determined that weneed. **(click)**

11.6 divided by 4 equals 2.9 cups per poun d. We can now take our 291.25 cups and divide it by 2.9 cups per pound to determine the number of pounds needed. (click)



The Child Nutrition Institute (Formerly NFSMI) provides an online calculator, which is tied to calculations within the food buying guide. This calculator can be located at http://fbg.nfsmi.org

The Food Buying Guide Calculator can be useful when determining how much of a product is needed for a recipe .

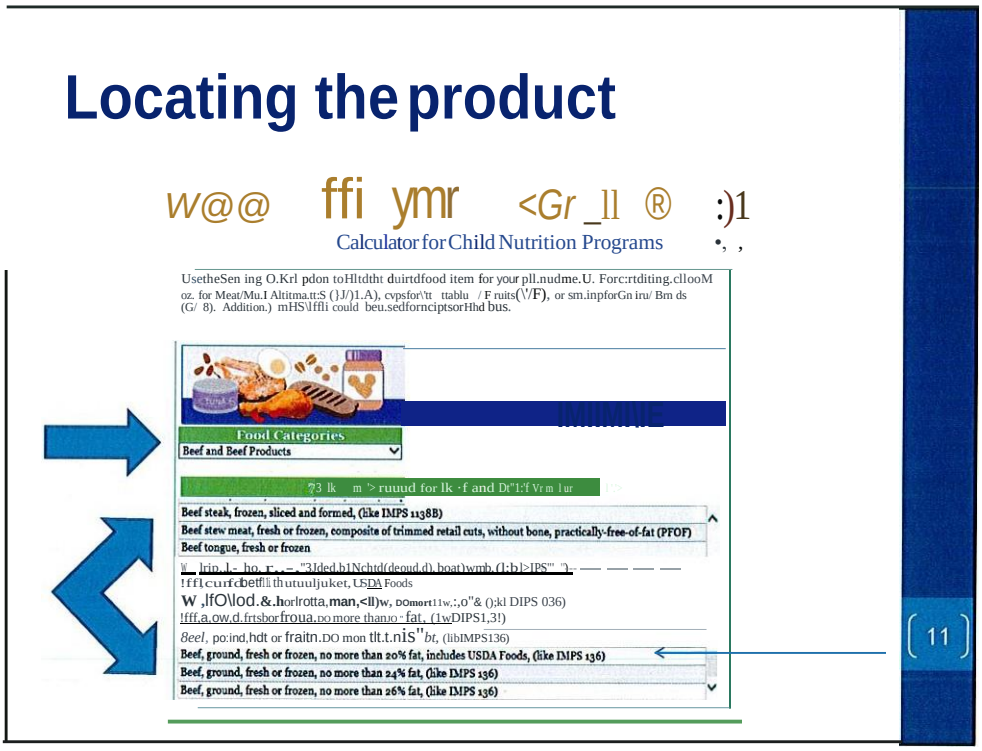
The following slides will provide an example on how to use the food buying guide calculator.

Choose the component, find the specific product

After going to the online food buying guide calculator , click on the component of the food item you are working with.

For our ist example , we are going to use ground beef.

Click the purple Meat/Meat Alternate banner to go to the corresponding component 's page . We will continue on the following slide .



For our example, we want to know how much ground beef, no more than 20% fat, is needed for 150 1-oz equivalent ser vings.

After selecting the Meat/Meat Alternate banner, select Beef and Beef Product s. (click)

After clicking on Beef and Beef Product s, a list of items will populat e. (click)

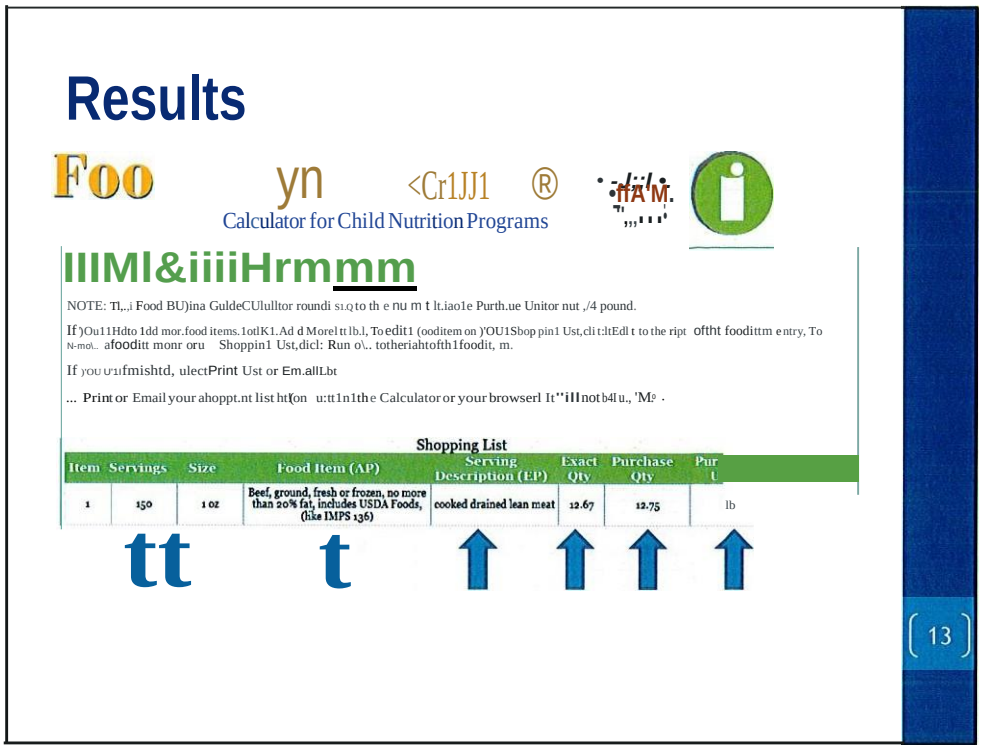
Scroll through the list until you find the appropriate product. You would be looking for the ground beef with no more than 20% fat. (click) Once this is located, click on it.

As a reminder from our last slide, we want to know how much ground beef, no more than 20% fat, is needed for 150 1-oz equivalent servings.

After clicking on our 20% fat ground beef, select the appropriate serving size from the drop down menu. Next, enter the number of servings needed.

As you can see, I have selected 1 oz for the serving size, and 150 servings needed, per our imaginary example .

After entering, click 'Add to List' to see the result s. (click}



After clicking 'Add', the results are displayed .

(click)
- As we can see, our 150 servings are listed.

(click)
- our one ounce serving equivalent size is listed.

(click)
- Our food item is listed, and is accurate, as we need it.

(click)
- The serving description indicates how we intend to serve or prepare the product

(click)
- The exact quantity is the exact amount needed in order to provide 150 one-oz eq servings

(click)
- The purchase quantity takes the Exact Qty and rounds up for ease of purchasing

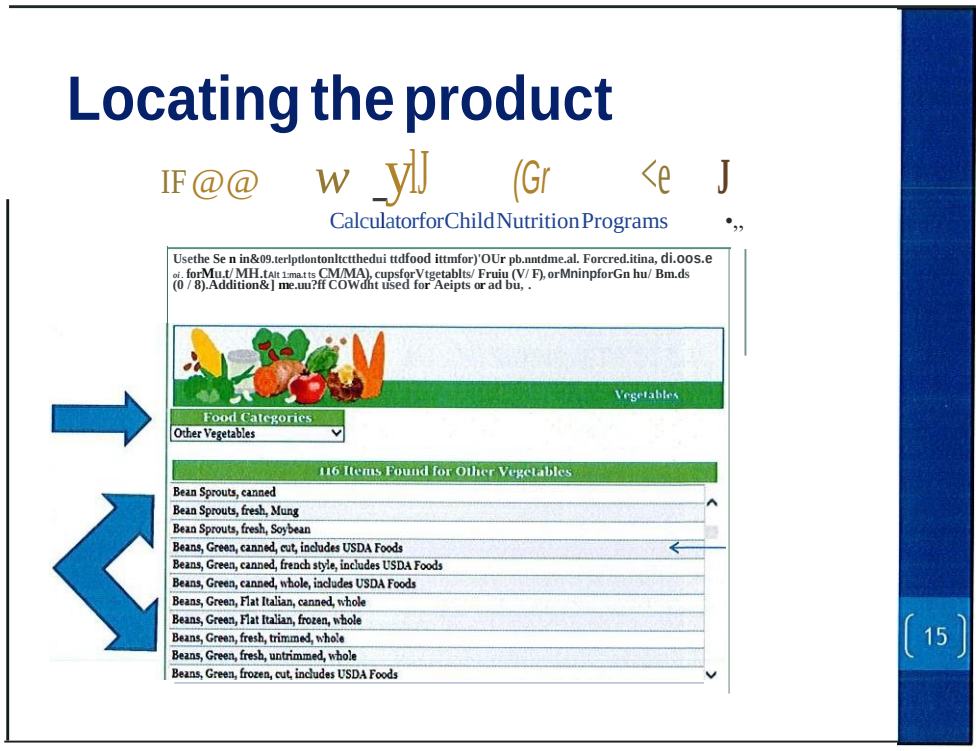
(click)
- The purchase unit indicates the unit in which the purchase will be made. In this example, we are purchasing in pounds.

We will do onemore example.

After going to the online food buying guide calculator , click on the component of the food item you are working with.

For our pt example, we are going to use green beans.

Click the green Vegetables banner to go to the correspondi ng component's pag e. We will continue on the following slid e.

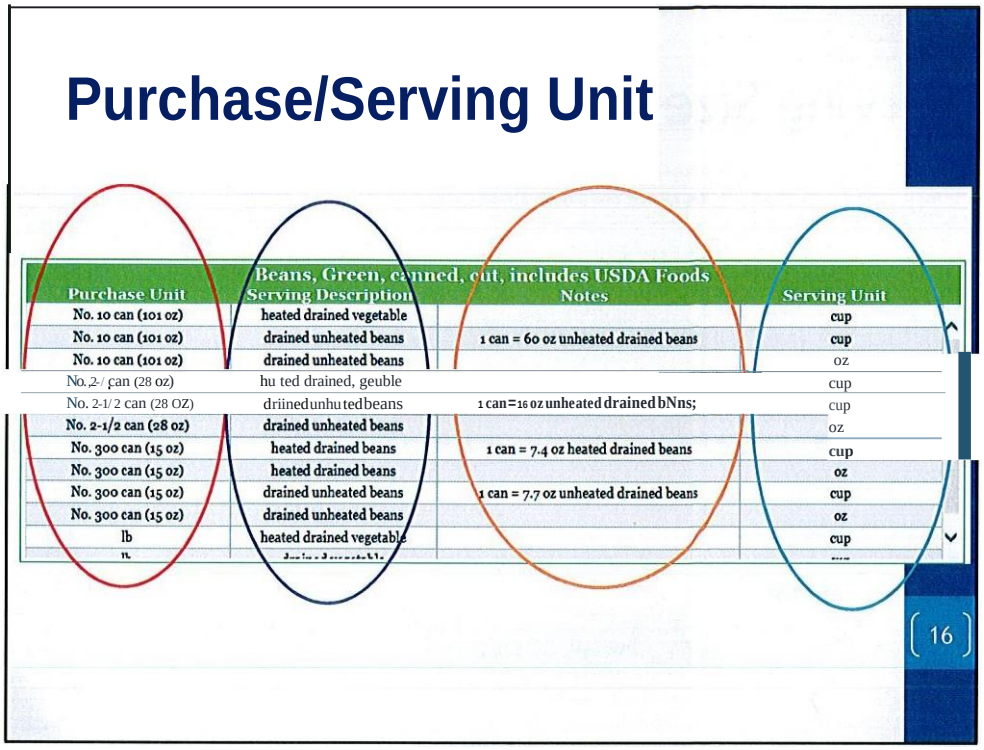


For this example, we need to figure out how many #10 cans of heated green beans, canned, cut are needed to provide 150 % cup servings.

Since green beans fall into the 'Other Vegetable' subgroup, choose the appropriate selection from the Food Categories drop-down menu. (click)

This will populate a list of vegetables . (click)

Scroll through the list to find the green beans, listed to be canned and cut. (click) Click on the Beans, Green, canned, cut selection once located.



As a reminder for this example, we need to figure out how many #10 cans of heated green beans, canned, cut are needed to provide 150 % cup servings.

After selecting on the product, we now need to make sure that we select the correct purchase unit, the correct serving description , and the correct serving unit.

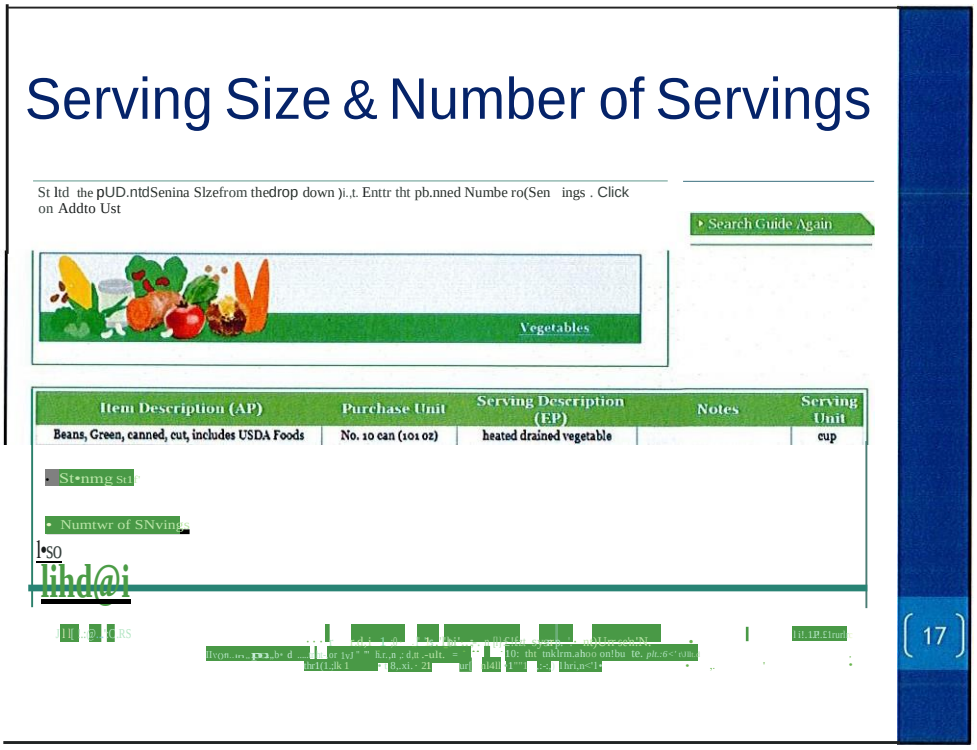
The ist column provides a list of the different purchase unit s available for this product. As we can see, there are different sizes of cans, and also pounds. As our example indicates, we need to know how many #10 cans of canned green beans are needed. We know that we must select one of the top three, as those are the only #10 cans in the list.

Next, the 2nd column lists how the product is ser ved. Since we are intending on heating our green beans, we know we must select the top opt ion.

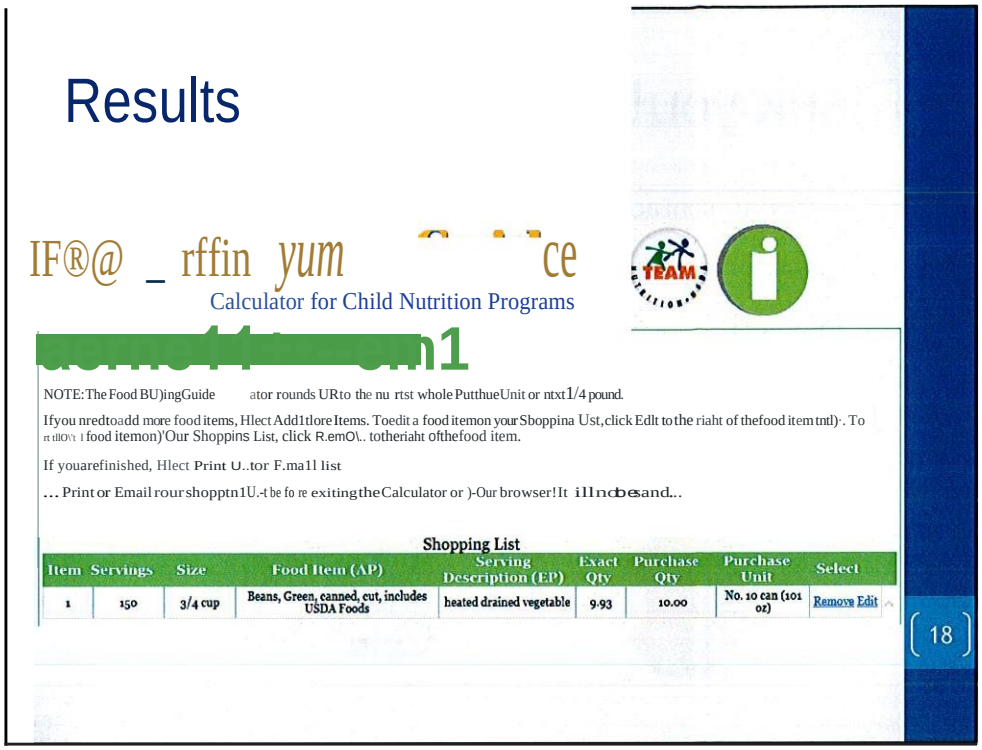
The 3rd column provides added information on the product, which can be helpful.

The final column provides the serving unit. In this case, cups is listed. Our example calls for the serving size of % cup, which will still work.

Click the top option on the screen, and we will cont inue .



After clicking on the product, select the appropriate serving size and type in the number of servings. Once the correct serving size and number of servings are listed, click 'Add to List' to see the results.



Just as befor e, we can see our number of servings, serving size, food item, serving description, exact quantity needed, purchasing quant it y, and the purcha se unit.

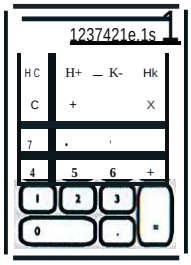
Accordin g to the food buying guide calculat or, we would need 10 #10 cans to provide 150 servings at the % cup size.

Thank you!

- Feel free to contact the CANS office

605-773-3413

DOE.Schooll unch@st ate.sd.us



19

This concludes our presentation on the food buying guide and the food buying guide calculator.

Please feel free to contact the CANS office with any further questions.

A certificate of completion will be featured on the following slide.

Food Buying Guide and FBG Calculator Training Professional Standards Training Credit

Print, sign Et date this certificate for your records.

- This training credits for 30 minutes of training in

  Key Area 1 - Menu Planning

  1150 - Menu Planning - Menu Analysis

  Key Area 2 - Operations

  2150 - CN Labeling, Crediting

Your Name:

Date of Training:

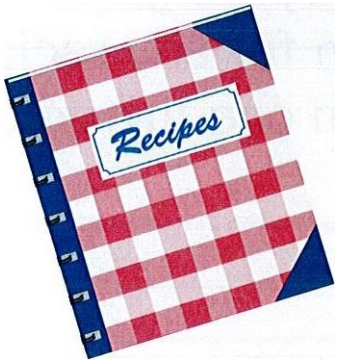
20

south dakota

Using Standardized Recipes

Can be found here: http://doe.sd.gov/cans/documents/UsingStndrdzdRecipes.pdf

USING STANDARDIZED RECIPES



SOUTH DAKOTA DEPARTMENT OF EDUCATION
CHILD ft ADULT NUTRITION SERVICES

1

Standardized Recipes

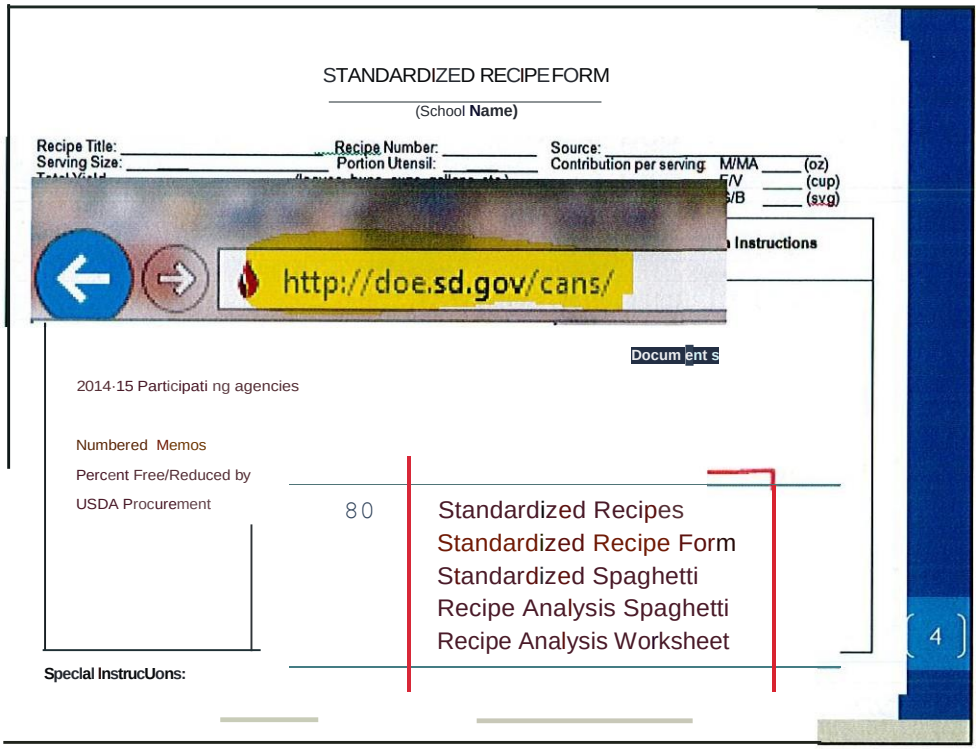
- **Required by program regulation for any recipe with more than one ingredient.**

2

Standardized recipes are required by program regulation. We will go into benefits and reasoning for recipes on the coming slide.

We will briefly review the benefits of using standardized recipes

- **Consistent food** quality-ensures that menu items are consistent
- **Predictable yield** - The planned number of servings will be produced. Help to reduce leftover food and helps prevent shortages
- **Customer satisfaction** - Well-developed recipes that appeal to students are an important factor in maintaining and increasing student participation levels.
- **Consistent nutrient content-ensure** nutritional values per serving are valid and consistent.
- **Food cost control** - provide consistent and accurate information for food cost control
- **Efficient purchasing procedures** - because the Quantity of food needed for production is easily calculated from the information on each standardized recipe.
- **Inventory control** -provides predictable information on the quantity of food used each time the recipe is produced.
- **Labor cost control** - Written standardized procedures in the recipe make efficient use of labor time and allow for planned scheduling of foodservice personnel for the work day. Training costs are reduced because new employees are provided specific instructions for preparation in each recipe.
- **Increased employee confidence** - by eliminating staff guesswork, a recipe decreases the chance for producing poor products and prevents shortages of food during meal service.
- **Successful completion of State/Federal reviews** -are a source of documentation for the Nutrient Analysis. Nutrient Analysis determines how well schools are meeting the nutrition standards set by USDA. Schools provide a week of menus, recipes and production records for nutrient analysis by the State Agency. A review cannot be completed if the recipes are missing information or provide inaccurate information on ingredients, yield or serving size.



This is the state prototype form - you may use another form but it need to contain all the information that is on this form.

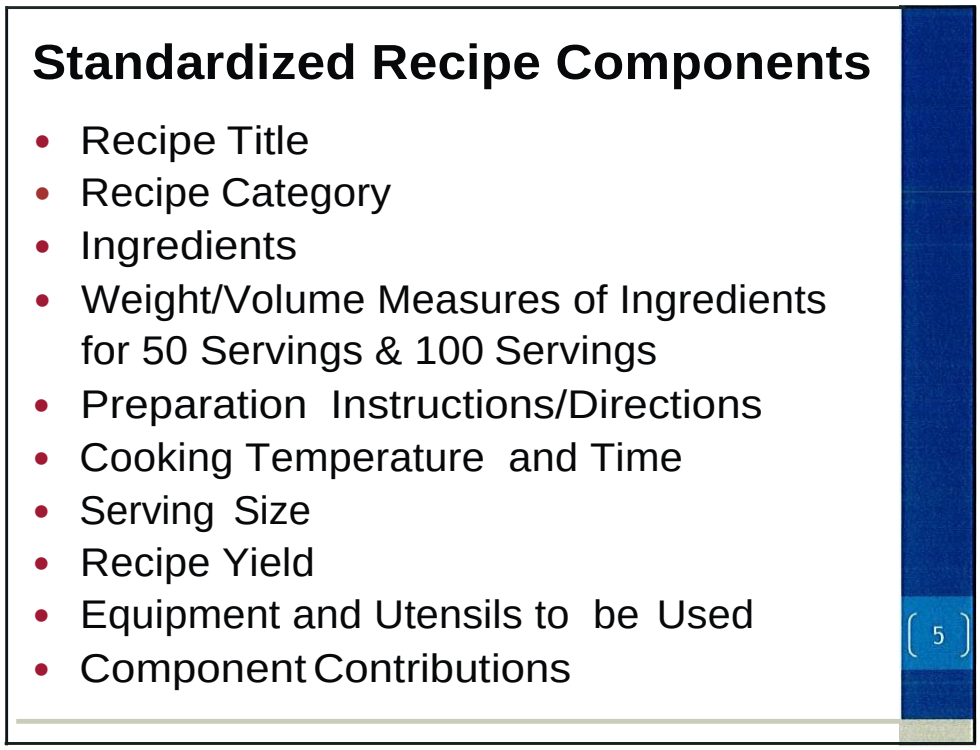
This form can be found on the DOE-CANS page (click).

Once on the CANS page, scroll down to the numbered memos link in the 'Documents' section (click).

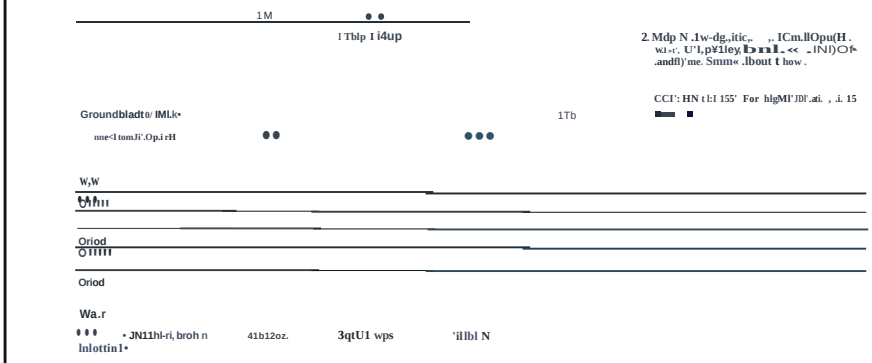
In the numbered memos, scroll down to NSLP Memo 80 - the Standardized Recipes section (click)

- In this section , you can access a blank Standardized Recipe Form, but there are also examples of the form, and recipe analysis.

Let's take a look at some of the recipe components of a USDA recipe.



Standardized recipes for school foodservice operations should always have certain components.
Let's look at the following 2 slides for each recipe component.



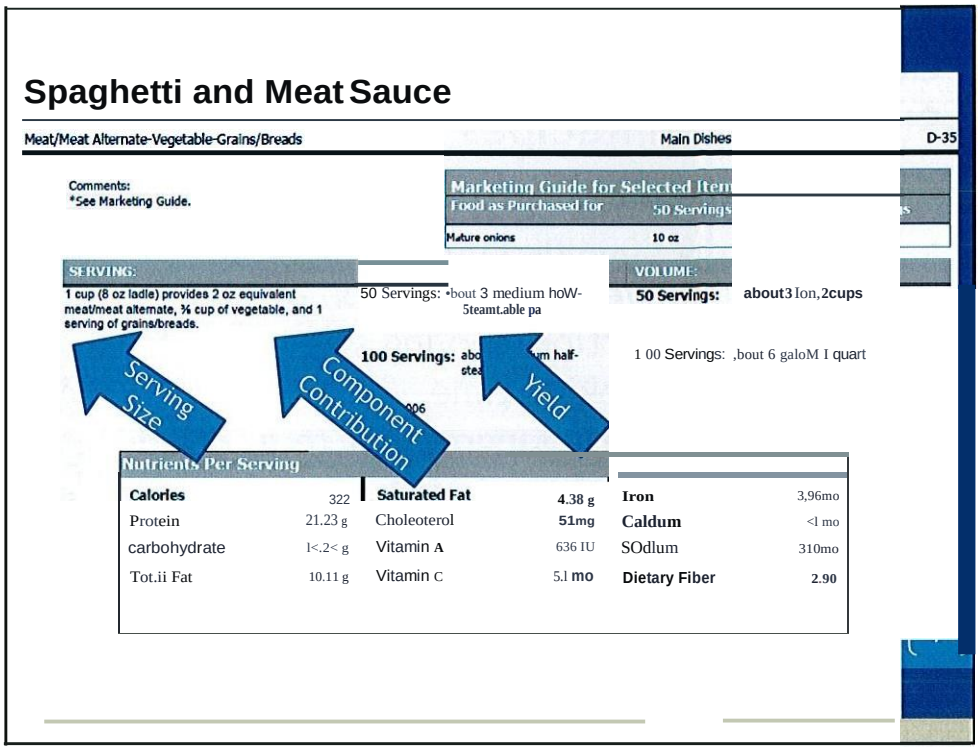
For this exam ple, we will use the USDA Recipe of Spaghetti and Meat Sauce - recipe D-35 .

- For a quick not e, a simple internet search of the term 'USDA Recipes ' will yield search results which provide an alphabetical lis t of USDA recipes. These USDA recipes feature pre-determined component crediting.

Arrow appear on each click.

Read Standardized Recipe components

Recipe Title
Recipe Category
Ingredients
Weight/Volume Measures of Ingredients for 50 Servings and 100 Servings
Preparat ion in st ructio ns/ Directions
Cooking Temperature and Time
Serving Size
Recipe Yield
Equipment and Utensils to be Used
Component Contr ibutions



**Arrow appear on each click.* **

Read Standardized Recipe components

Serving Size

Recipe Yield

Equipment and Utensils to be Used

Component Contributions

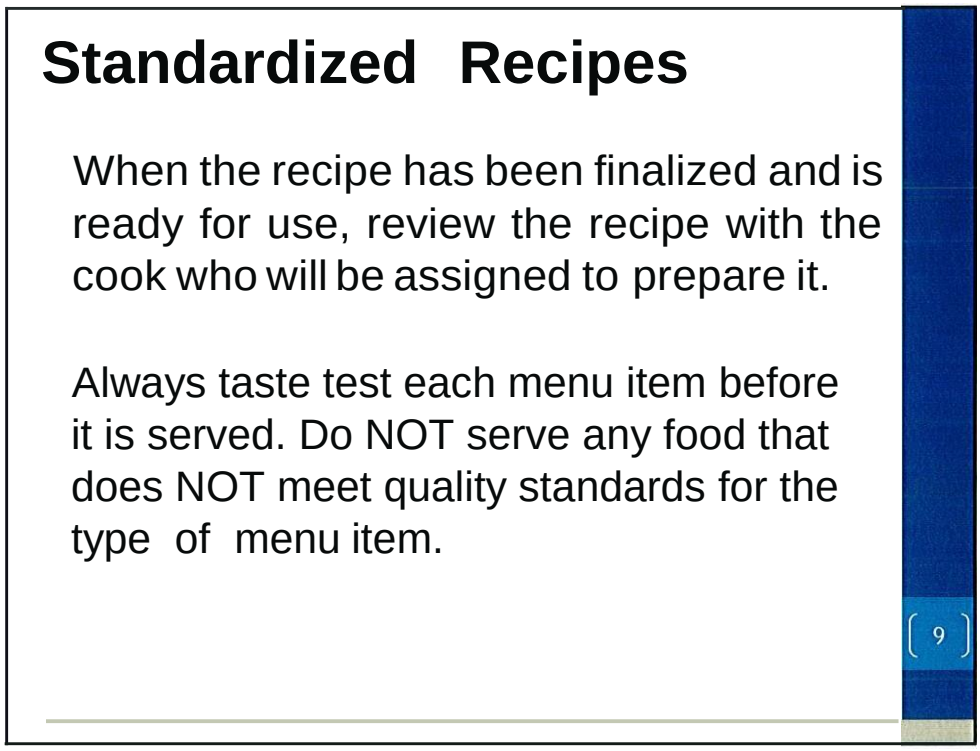
- Look at the serving size -this recipe is for a 1 oz serving size. If you want to serve a 2 oz serving portion, you would have to figure out how many 2 oz portions you need and adjust the recipe accordingly. This will be important for meeting meal pattern requirements including the nutrition standards.

Common Changes Made to Standardized Recipes

- Changing the pan size
- Changing the cooking equipment (e.g. conventional oven to convection oven)
- Changing the portion/serving size
- Changing the cooking time
- Changing a flavoring ingredient (e.g. dried onions instead of fresh onions)
- Making a small adjustment in an ingredient (e.g. substituting low-fat milk for whole milk)

8

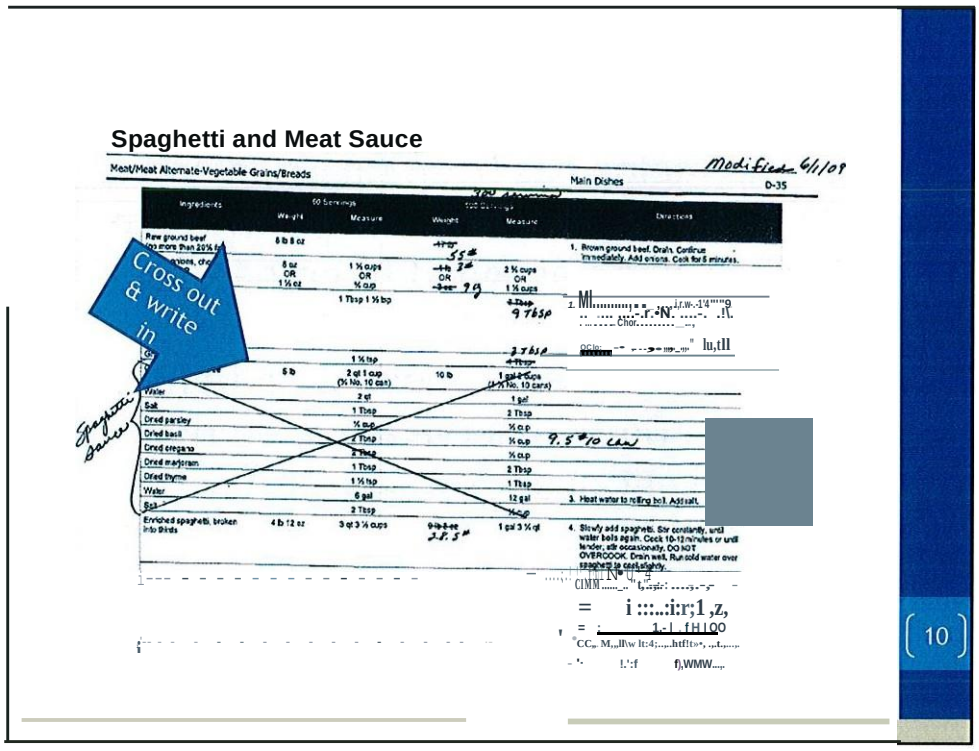
Here are some ideas on how to standardize a recipe. You have probably already done these but just didn't think of it as standardizing. Once you've made the recipe, determine if you need to make any adjustments and record those on the recipe - it could be in pan size, a change in equipment, changing portion size, cooking time, seasonings, etc.



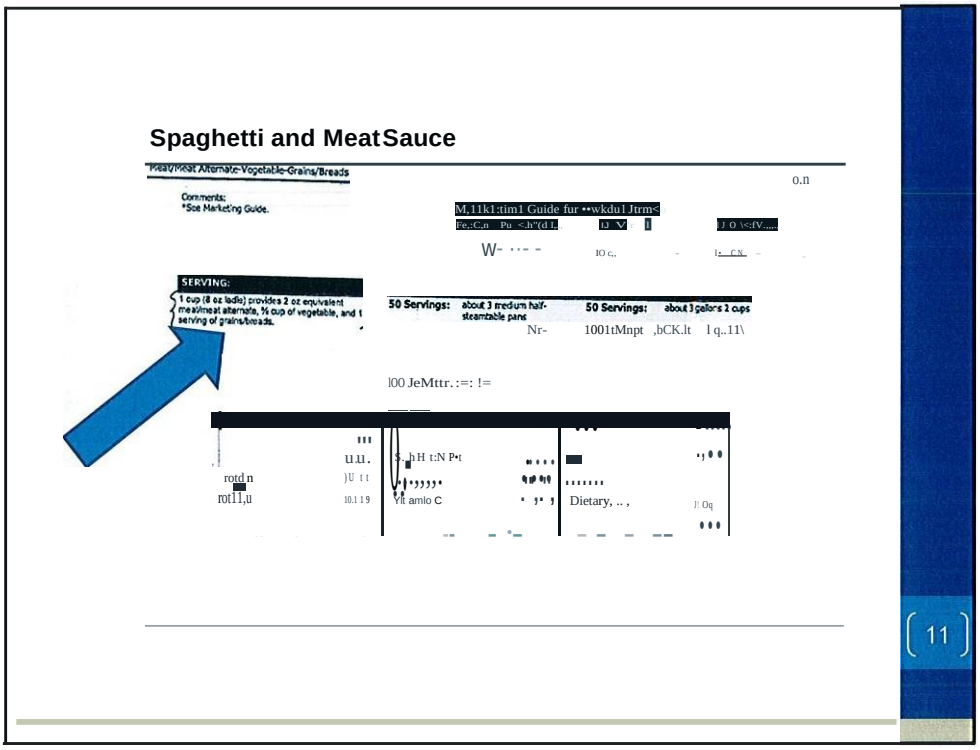
Read slide -
When the recipe has been finalized and is ready for use, review the recipe with the cook who will be assigned to prepare it.

Always taste test each menu item before it is served. Do NOT serve any food that does NOT meet quality standards for the type of menu item.

A couple of good reminders:
Always review recipes with the cooks who will bepreparingthem and do a taste test.

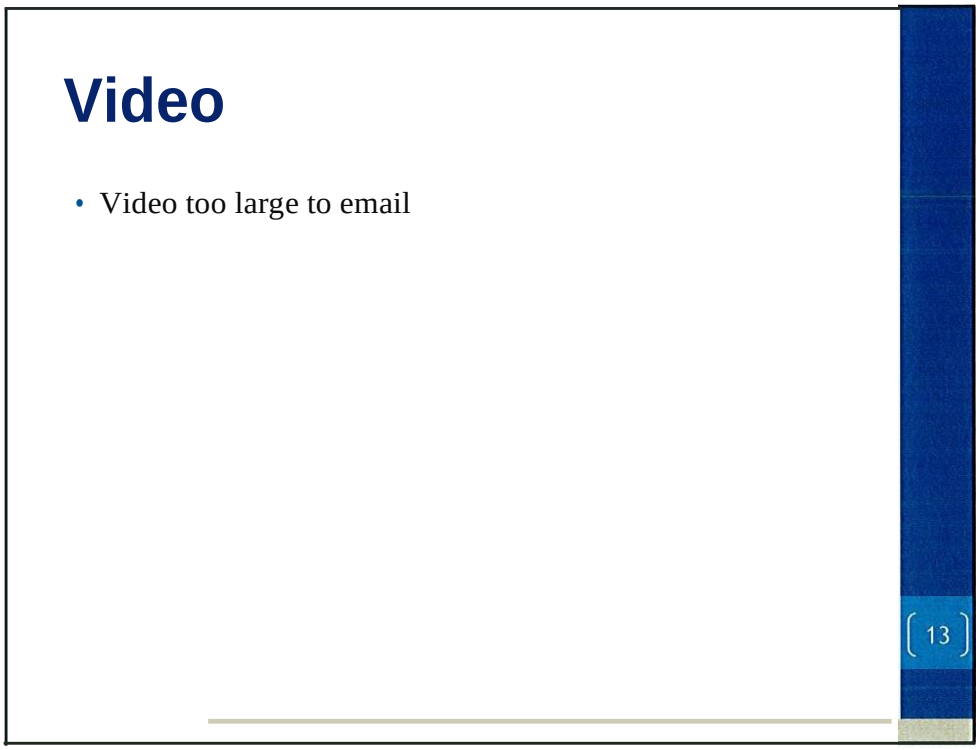


Another easy way to standardize a recipe is to take a recipe and cross out and write in what you are doing. In this example you might not want to use tomato sauce with all the added seasonings - just want to simply use a canned spagh ett i sauce. So just cross out and write in what is actually being done.



If you change anything in the recipe you must make sure that it does not change the component crediting per serving size. If amounts of crediting ingredients are adjust ed, you must update the "Serving" area of the recipe to reflect component crediting changes.

Next, we will discuss the adjusting of recipes. This would be used when a recipe is already on hand , however, a different yield is necessary.



We will begin by watching a short video regarding the recipe adjustment.

Recipe Adjustment

1. **Determine the factor.**

$$\frac{\text{Needed Yield}}{\text{Recipe Yield}} = \text{FACTOR}$$

- **Factor: Number by which to multiply all the ingredients.**

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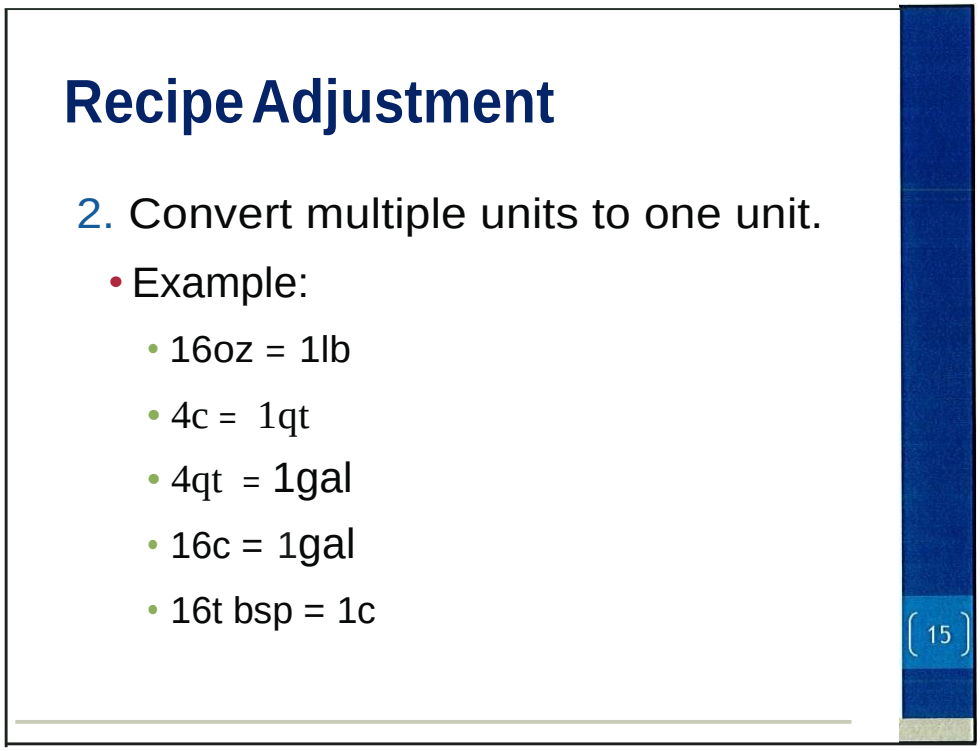
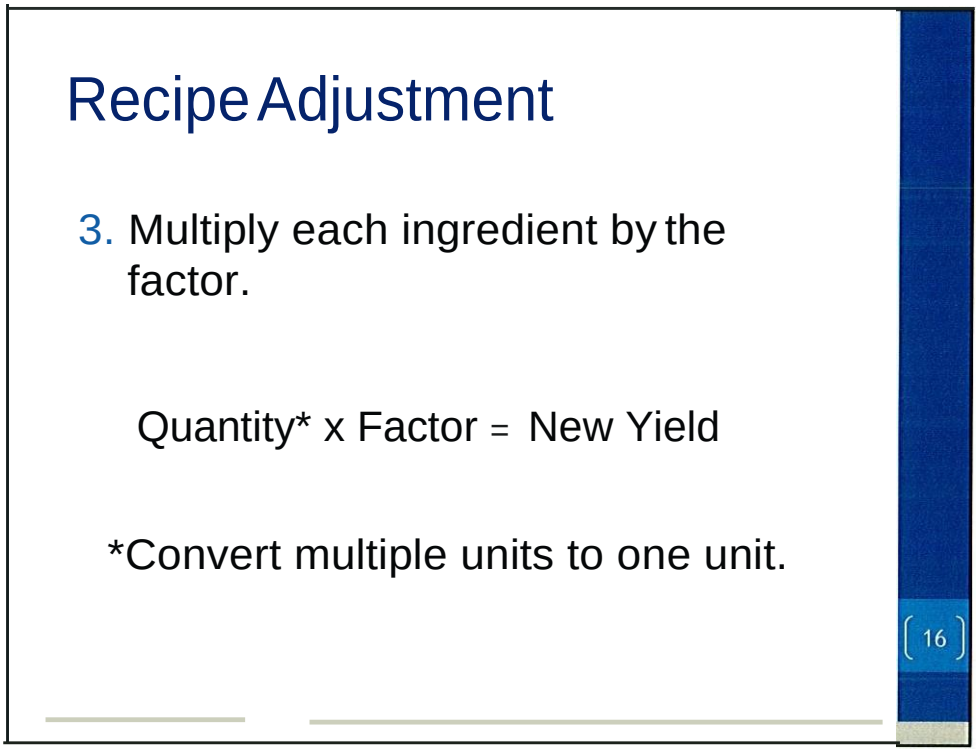
As listed in the video, we must use our needed yield and the recipe yield to determine the factor.

The factor number will be used to multiply all ingredients of the recipe, to determine the new amount of ingredients to use. We will provide more examples on this in the coming slides .



After the factor is determined, convert multiple units to one unit .

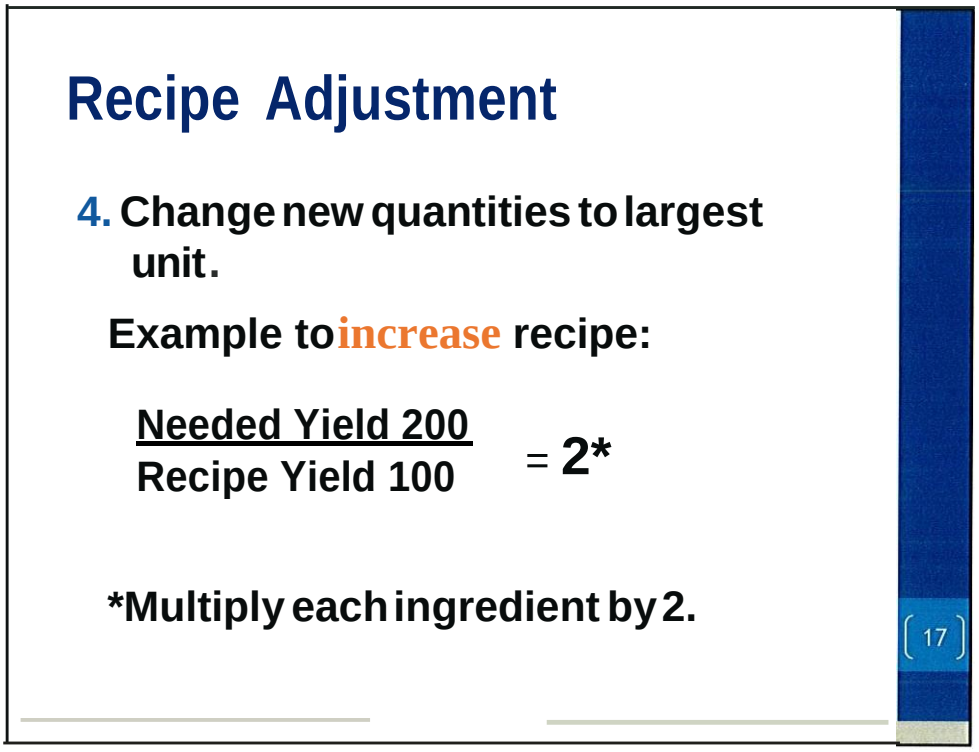
- For example if a recipe calls for 1 pound and 4 ounces of ground beef, convert this to 20 ounces.



As we recall from the video, multiply each ingredient by the factor.

Take the Quantity of each ingredient in the recipe x the Factor= New Yield

*Remember to Convert multiple units to one unit prior to multiplying.



After the new yield has been determined by multiplying the ingredients by the factor, change new quantities to largest unit.

For example, if the recipe yields 100 servings, but you need 200 servings, take 200 divided by 100. This gives us a factor of 2. Multiply each ingredient by the factor of 2.

Make sure to record the new amounts on your recipe.

Recipe Adjustment

4. Change new quantities to largest unit.

Example to **decrease** recipe:

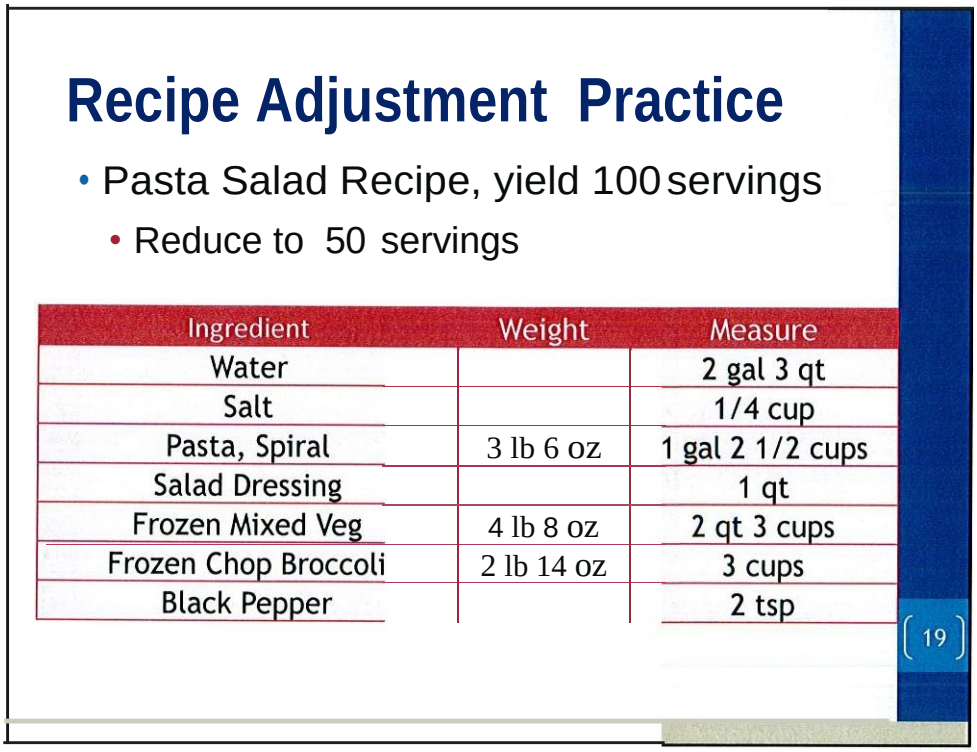
Needed Yield 25= O S*
Recipe Yield 50 •

*Multiply each ingredient by 0.5.

18

In this example, our recipe would yield 50 servings, howeve r, we would only need 25. Take 25 divided by 50, which gives us a factor of .5

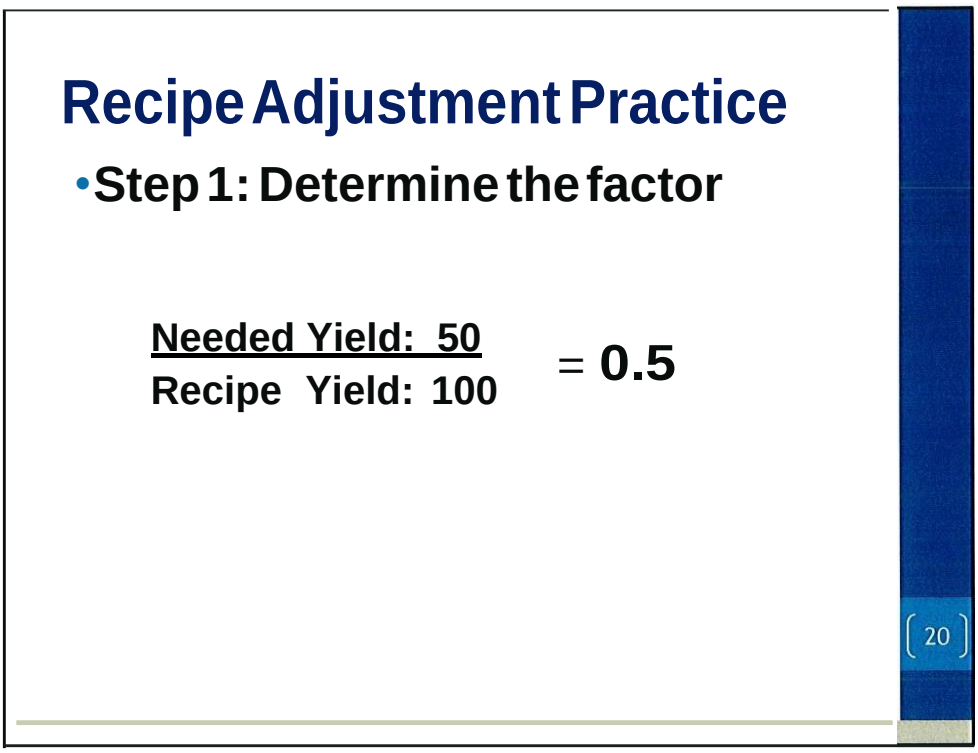
Multiply each ingredient by .5 to determine the new amount of each ingredient.



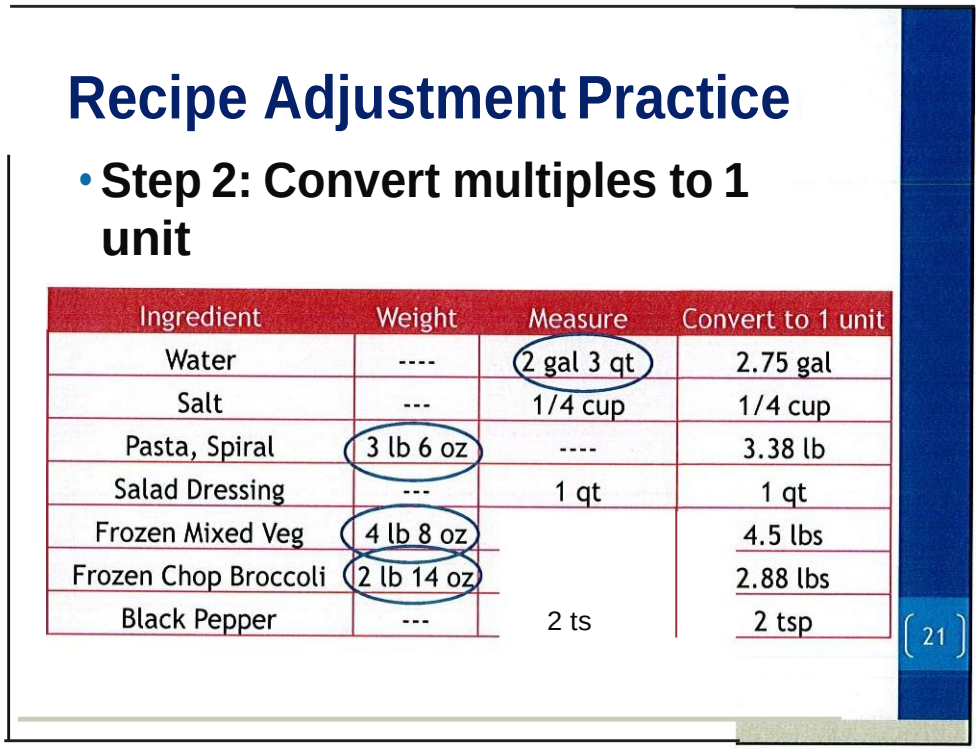
Ingredient	Weight	Measure
Water		2 gal 3 qt
Salt		1/4 cup
Pasta, Spiral	3 lb 6 oz	1 gal 2 1/2 cups
Salad Dressing		1 qt
Frozen Mixed Veg	4 lb 8 oz	2 qt 3 cups
Frozen Chop Broccoli	2 lb 14 oz	3 cups
Black Pepper		2 tsp

Let's give this a t ry.

Here we have a Pasta salad recipe with all ingredients li sted, which yields 100 servin gs. Let's follow the steps together to reduce the recipe for 50 servings.



The first step is to determine our factor.
The recipe yields 100 servin gs, h ow ever , we only need 50 servings. Take 50 and divide by 100. This gives us a factor of .5



Next, we need to convert to a single unit. You can convert to the smaller unit of measure, as done in the video, or save a step, and convert to the largest unit of measure right now. When converting to the larger unit of measure, you will have a number with a decimal.

We will go into the detail with the math on the coming slide .

For the Pasta -

If we know that onepound has 16 ounces in it, we can simply take our 6 ounces divided by 16.

6 divided by 16 gives us .375, or .38. Add this decimal to our full 3 pounds.

This gives us 3.375, or 3.38 lbs.

- If you wanted to bring this to total ounces, you can take 3.38 x 16.

For the Frozen Mixed Vegetables -

If we know that onepound has 16 ounces in it, we can simply take our 8 ounces divided by 16.

Take 8 divided by 16. This gives us .50. Add this decimal to our full 4 lbs.

This gives us 4.5 lbs.

- If you wanted to bring this to ounces, you can take 4.5 x 16 .

For the Frozen Chop Broccoli -

If we know that one pound has 16 ounces in it, we can simply take our 14 ounces divided by 16.

Take 14 divided by 16. This gives us .875, or .88. Add this decimal to our full 2 lbs. This gives us 2.88 lbs.

- If you wanted to bring this to ounces, you can take 2.88 x 16 .

Recipe Adjustment Practice

- Step 2: Convert multiples to 1 unit
  - Water - gallons and quarts
    - 1 gallon = 4 quarts c>
      - 3 (recipe) + 4 = 0.75 gal
    - Add the full gallons to the partial gal: 2 + 0.75 = 2.75 gal Water

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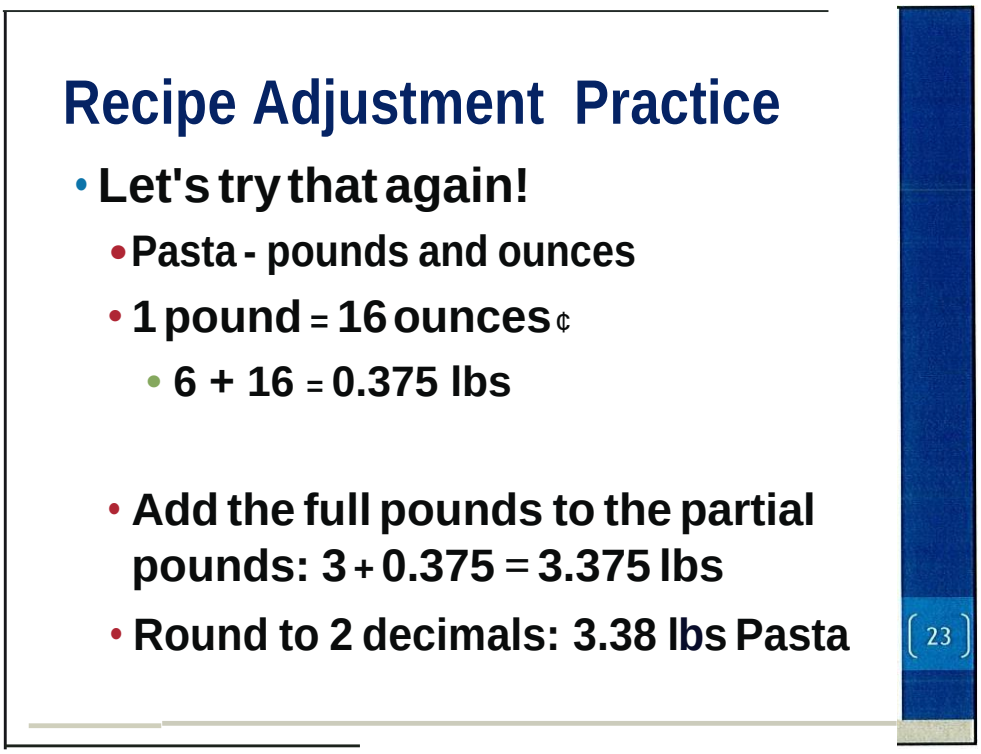
For the water -
1 gallon has 4 quarts - Take the 3 quarts listed in the recipe and divide by number of quarts in one gallon - 4 quarts.
3 divided by 4 gives us .75.

Add the 2 full gallons to the partial gallon , and we have 2.75 gallons of water.



For the Pasta -
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6 divided by 16 gives us .375, or .38. Add this decimal to our full 3 pounds.
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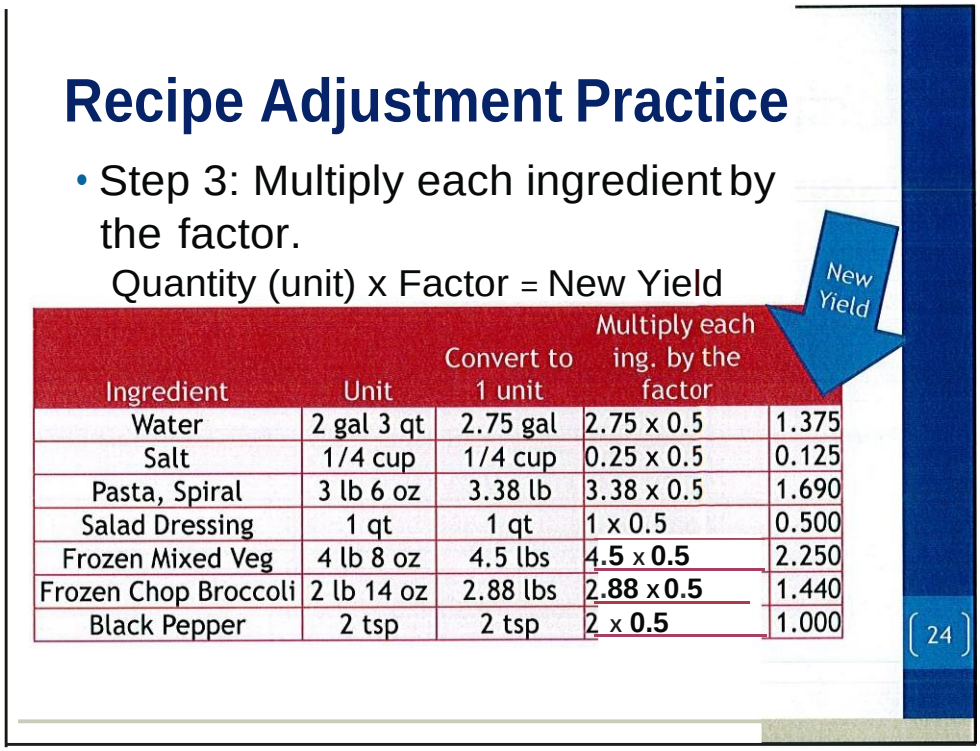
Take 8 divided by 16. This gives us .50. Add this decimal to our full 4 lbs.
This gives us 4.5 lbs.

- If you wanted to bring this to ounces, you can take 4.5 x 16.

For the Frozen Chop Broccoli -
If we know that onepound has 16 ounces in it, we can simply take our 14 ounces divided by 16.
Take 14 divided by 16. This gives us .875, or .88. Add this decimal to our full 2 lbs.
This gives us 2.88 lbs.

- If you wanted to bring this to ounces, you can take 2.88 x 16 .

1 gallon to 4 quarts: 1/4 = 0.25 => 3*0.25 = 0.75
1 lb to 16 oz : 1/16 = 0.0625 => 6*0.0625 = 0.375
1 lb to 16 oz : 1/16 = 0.0625 => 8*0.0625 = 0.5
1 lb to 16 oz : 1/16 = 0.0625 => 14*0.0625 = 0.875



Ingredient	Unit	Convert to 1 unit	Multiply each ing. by the factor	
Water	2 gal 3 qt	2.75 gal	2.75 x 0.5	1.375
Salt	1/4 cup	1/4 cup	0.25 x 0.5	0.125
Pasta, Spiral	3 lb 6 oz	3.38 lb	3.38 x 0.5	1.690
Salad Dressing	1 qt	1 qt	1 x 0.5	0.500
Frozen Mixed Veg	4 lb 8 oz	4.5 lbs	**4.5** x **0.5**	2.250
Frozen Chop Broccoli	2 lb 14 oz	2.88 lbs	**2.88** x **0.5**	1.440
Black Pepper	2 tsp	2 tsp	2 x **0.5**	1.000

Now that we have converted all ingredients to one unit, multiply the single unit of each ingredient by our factor of .5.

This multiplication generates new quantities for each of our ingredients. The results are listed in the far right column, identified by the 'new yield' arrow.

Recipe Adjustment Practice

- **Step 3: Multiply each ingredient by the factor.**

Ingredient	Unit	Convert to 1 unit	Multiply each ing. by the factor		Amount to use in the recipe for 50 servings
Water	2 gal 3 qt	2.75 gal	2.75 x 0.5	1.375	22cups or 1gal 6cups
Salt			0.25 x 0.5	0.125	2Tbsp
Pasta S iral		3.38 lb	3.38 x 0.5	1.690	27oz or 1lb 11oz
Salad Dressin			1 x 0.5	0.500	2cu s
Frozen Mixed Veg	4 lb 8 oz	4.5 lbs	4.5 x 0.5	2.250	36oz or 2lbs 4oz
Frz Chop Broccoli	2 lb 14 oz	2.88 lbs	**2.88** x 0.5	1.440	23oz or 1lb 7oz
Black Pepper	2 ts		2 x 0.5	1.000	1tsp

We can see that our new quantity of water is 1.375 gallons. To make this number useful, we will want to figure out how many cups the remaining decimal of .375 represents.

- Since there are 16 cups in one gallon , take .375 x 16. This gives us 6 cups.
    - Our new total quantity of water needed is 1 gallon, and 6 cups.

We can see that our new quantity of pasta is 1.69 lbs. To make this number useful, we will want to figure out how many ounces the remaining decimal of .69 represents.

- Since there are 16 ounces in one lb, take .69 x 16. This gives us 11 ounces.
    - Our new total quantity of pasta needed is 1 lb, 11 ounces.

We can see that our new quantity of mixed vegetables is 2.25 lbs. To make this number more useful, we will want to figure out how many ounces the remaining decimal of .25 represent s.

- Since there are 16 ounces in one lb, take .25 x 16. This givesus 4 ounces.
    - Our new total quantity of mixed vegetables needed is 2 lbs, 4 ounces.

We can see that our new quantity of frozen chopped broccoli is 1.44 lbs. To make this number more useful, we will want to figure out how many ounces the remaining decimal of .44 represents.

- Since there are 16 ounces in one lb, take .44 x 16. This gives us 7.
    - Our new total quantity of frozen chopped broccoli needed is 1 lb, 7 ounces.

(Click)

You can always bring amounts down to a smaller form of measurement.
1 gallon to 16 cups 1/16 0.0625
1 cup to 16 Tbsp 1/16 0.0625
1 lb to 16 oz 1/16 0.0625
1 qt to 4 cups 1/4 0.25

Thank you for viewing this presentation on Standardizing Recipes.

Please feel free to contact our office with any questions.

A certificate of completion will be featured on the following slide.

Standardizing Recipes Training
Professional Standards Training Credit

Print, sign Et date this certificate for your records.

- This training credits for 30 minutes of training in

  Key Area **1** - Menu Planning

  1111.0 - Menu Planning - Standardizing Recipes

  1150 - Menu Planning - Menu Analysis

  Key Area 2 - Operations

  2110 - Operations - Standardizing Recipes

Your Name:

Date of Training:

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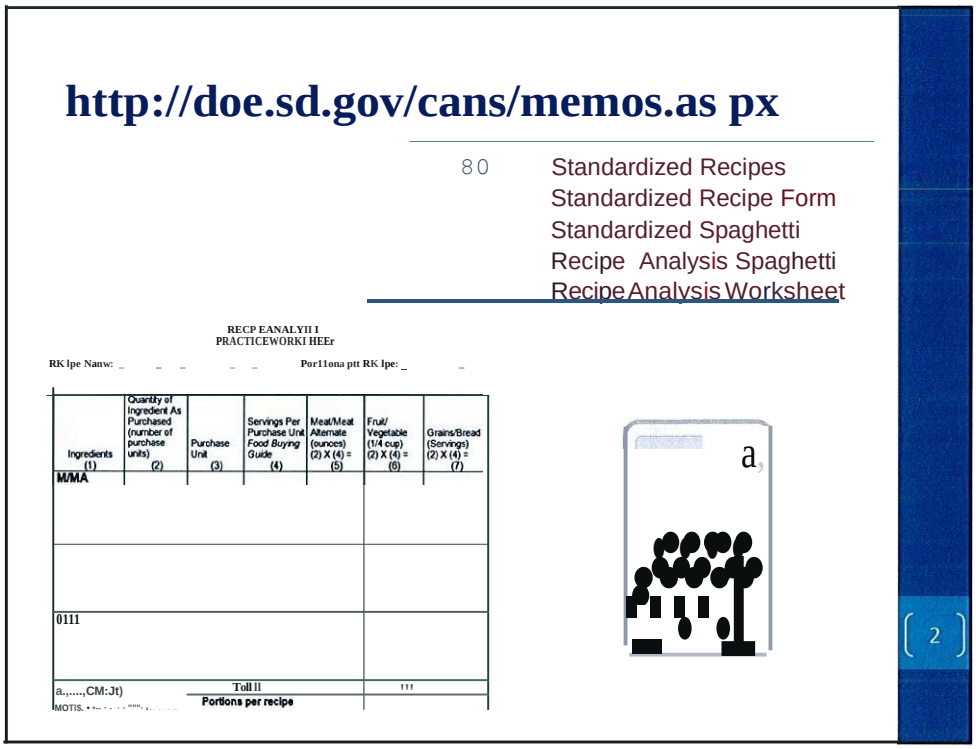
Component Crediting

South Dakota Department of Education
Child & Adult Nutrition Services

1

Good day,
The following presentation will focus on how to calculate crediting for components on the school lunch and breakfast program. We will be using recipes, and a component contribution worksheet, which can be found on the CANS-memos webpage, under Memo 80 - Recipe Analysis Worksheet.



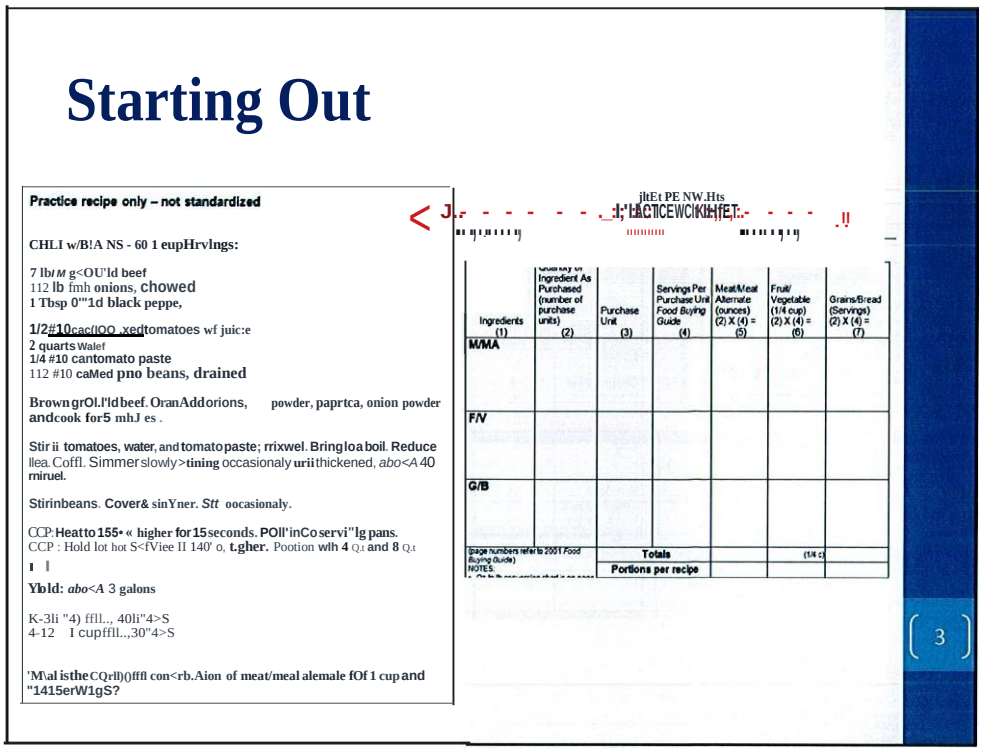
Before we begin, please go to the CANS-memo page, and save a copy of the Recipe Analysis Worksheet found in NSLP Memo 80.

Scroll down and find NSLP Memo 80, and click on the Recipe Analysis Worksheet. This will open a practice worksheet in Word document form. Save the workbook in a location where you will be able to find it.

Please have the practice worksheet and calculator available.

Also, calculating components can be comple x and problem ati c. Please feel free to pause the webinar as you go, or re-wat ch aft erward .

Starting Out



Practice recipe only – not standardized

CHLI w/B!A NS - 60 1 eupHrvlngs:

7 lb*M* g<OU'ld beef
112 lb fmh onions, chowed
1 Tbsp 0'"1d black peppe,

1/2#10cac/IOO .xedtomatoes wf juic:e
2 quarts Walef
1/4 #10 cantomato paste
112 #10 caMed pno beans, drained

Brown grOl.l'ld beef. OranAddorions, powder, paprtca, onion powder andcook for5 mhJ es .

Stir ii tomatoes, water, and tomato paste; rrixwel. Bringloa boil. Reduce llea. Coffl. Simmer slowly>tining occasionaly urii thickened, *abo<A* 40 rmiruel.

Stirinbeans. Cover& sinYner. *Stt* oocasionaly.

CCP: Heatto 155• « higher for15seconds. POll'inCo servi"lg pans.
CCP : Hold lot hot S<fViee II 140' o, t.gher. Pootion wlh 4 Q.t and 8 Q.t

Ylold: *abo<A* 3 galons

K-3li "4) ffll.., 40li"4>S
4-12 I cupffll..,30"4>S

'M\al isthe CQrll()ffl con<rb.Aion of meat/meal alemale fOf 1 cup and "1415erW1gS?

jltEt PE NW.Hts

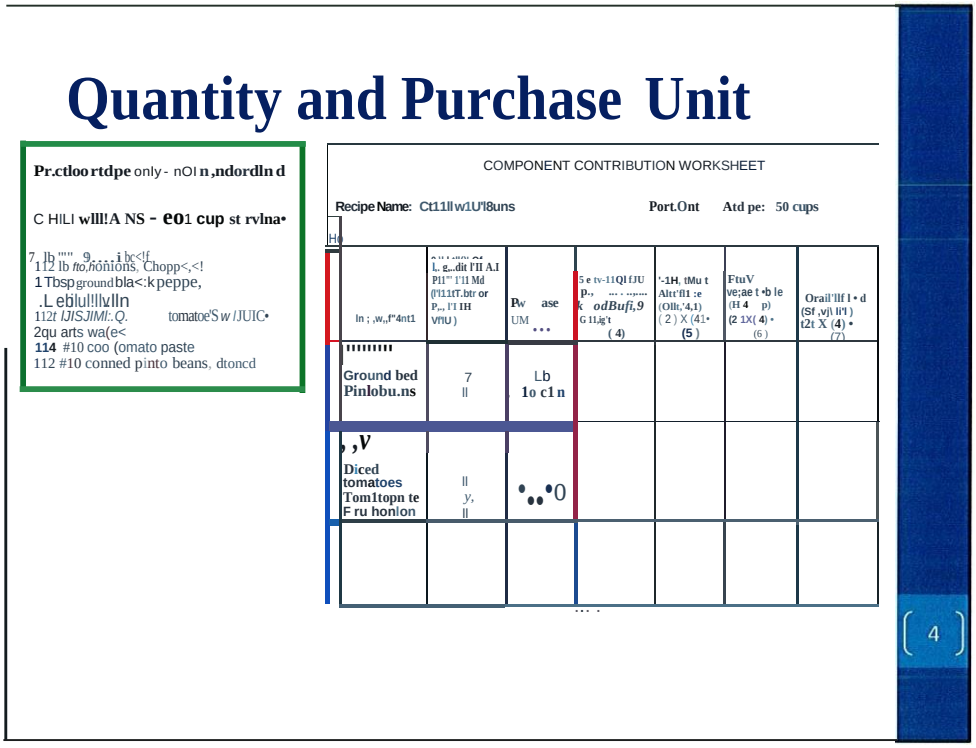
Ingredients (1)	Quantity of Ingredient As Purchased (number of purchase units) (2)	Purchase Unit (3)	Servings Per Purchase Unit Food Buying Guide (4)	Meat/Meat Alternate (ounces) (2) X (4) = (5)	Fruit/ Vegetable (1/4 cup) (2) X (4) = (6)	Grains/Bread (Servings) (2) X (4) = (7)
M/MA						
F/V						
G/B						
(page numbers refer to 2001 Food Buying Guide) NOTES.		Totals			(1/4 c)	
		Portions per recipe				

3

The listed practice chili recipe will be used today. Begin by first recording the recipe name and portions per recipe . (click).

We will go through the different components on the coming slides.

Quantity and Purchase Unit



As you can see, we have added our recipe name and portion s per recipe to the component contribution worksheet. We are now going to add the creditable ingredients from the recipe. I have snipped a copy of recipe ingredients for your convenience.

On the practice worksheet , record the credit able ingredients in column 1, and the quantity of the ingredientin column 2. Record the purchase unit in column 3.

The recip e call s fo r 7 pound s of ground beef. We have recorded t his accordin gly on the practice sheet (click). Additiona lly, the menu planner has decided to also count pinto bean s as a meat/ me at alternat e in the recipe, which is accept able. We have recorded the *Yi* #10 can of pinto beans in the M/MA section of the worksheet .

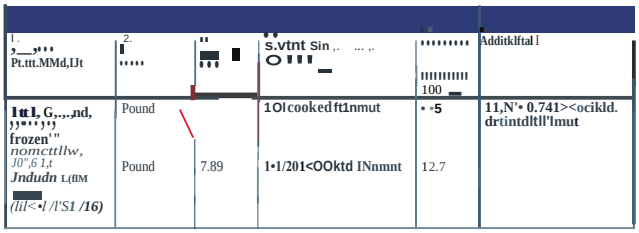
NOTE - legumescan be counted as a Meat/Meat Alternate OR a veget able in a recipe, but cannot be counted as bot h.

Moving down to the Vegetable sect ion , we have recorded diced tomatoe s, t omat o paste, and fresh onion on the practice worksheet, along with their corre sponding quantit ies, and purchase unit. (click)

We will continu e on the following sli d e.

Arithmetic - Ground Beef

Ingredients (1)	Quantity of Ingredient As Purchased (number of purchase units) (2)	Purchase Unit (3)	Servings Per Purchase Unit *Food Buying Guide* (4)	Meat/Meat Alternate (ounces) (2) X (4) = (5)	Fruit/ Vegetable (1/4 cup) (2) X (4) = (6)	Grains/Bread (Servings) (2) X (4) = (7)
M/MA						
Ground beef	7	Lb	11.8	82.6		
Pinto beans	½	#10 can	37.2	18.6		



The next column to fill inis column 4 - servings per purchase unit. We will first do the ground beef. As we can see in the food buying guide, 1 pound provides 11.80 1-oz servings of cooked lean meat. (click)

We are going to take the servings per purchase unit from the food buying guide and record it on the practice worksheet. (click)

Please note, we are using the 1 oz line in the food buying guide sinceit is easier to work with 1 than 1.5. Also, a conversion would be needed later on if we didn't use the 1 oz line .

To fill in column 5, we need to take column 2 x column 4. (click). This means we must take 7 x 11.8. When we enter this into our calculator, we get 82.6. (click). This means that 7 pounds of ground beef provide 82.6 creditable ounces of meat .

We will work on the pinto beans on the following slide.

Arithmetic - Pinto Beans

Ingredients (1)	Quantity of Ingredient As Purchased (number of purchase units) (2)	Purchase Unit (3)	Servings Per Purchase Unit *Food Buying Guide* (4)	Meat/Meat Alternate (ounces) (2) X (4) = (5)	Fruit/ Vegetable (1/4 cup) (2) X (4) = (6)	Grains/Bread (Servings) (2) X (4) = (7)
M/MA						
Groundbeel Pinto beans	7 Yt	Lb #10 can	11.8 37.2	82.6 18.6		

eat Alternates

t. food Al Pur<hiiMd, AP	J. Purchue Untt	3. Servings Per Purchase Unit, EP	4. Serving Size per Meal Contribution	5. Purchase Units for 100 Servings	6. Additional Information
IIL!ANS , PINTO					
Be,1ns, Pinto, dry, unned *Whole Indudt!sUSOA*	No. 10 can (108 oz)	37.20	1/4 cup heated, drained beans	2.7	1 No. 10 can • about 67.4 oz (9·1/ 4 cups) heated, d<alned beans

6

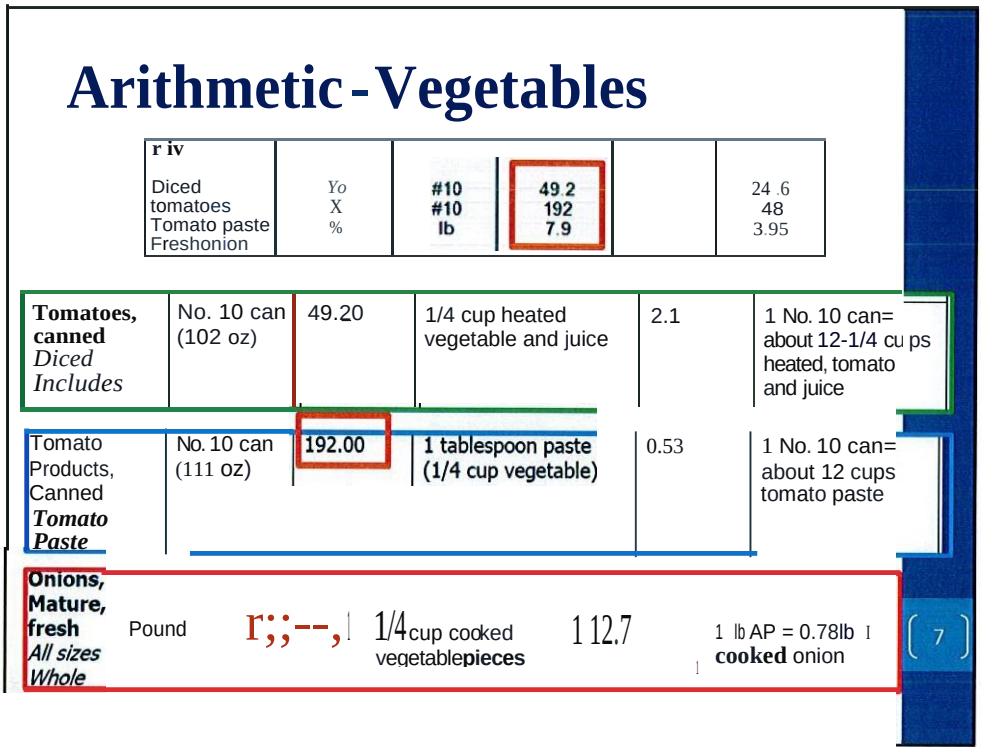
The next column to fill inis column 4- servings per purchase unit. Since we have completed the ground beef, we will now work on the Pinto Beans. As we can see in the food buying guide, 1 Number 10 can of pinto beans provide 37.2 servings of X cup heated, drained beans. (click)

We are going to take the servings per purchase unit from the food buying guide and record it on the practice worksheet. (click)

To fill in column 5, we need to take column 2 x column 4. (click). This means we must take .5 x 37.2. When we enter this into our calculator, we get 18.6. (click). This means that *Yi* of a #10 can of pinto beans provide 18.6 X cups.

Please note - in this example, we are crediting the pinto beans as a meat/meat alternate. This is somewhat uncommon, but is allowable. For crediting purposes, X c of legumes credit as 1 oz of meat/meat alternate. Since the legumes are already in this X c format from the food buying guide, no conversion will be needed later on. We will discuss this more later in the presentation.

Next, we will work on the vegetables.



The next column to fill in is column 4 - servings per purchase unit for the vegetables.

For purpo ses of this exerc ise, we have provided a snippet of each vegetable on this page . The canned tomatoes have the green border, the tomato paste has the blue border, and the onions have the red border.

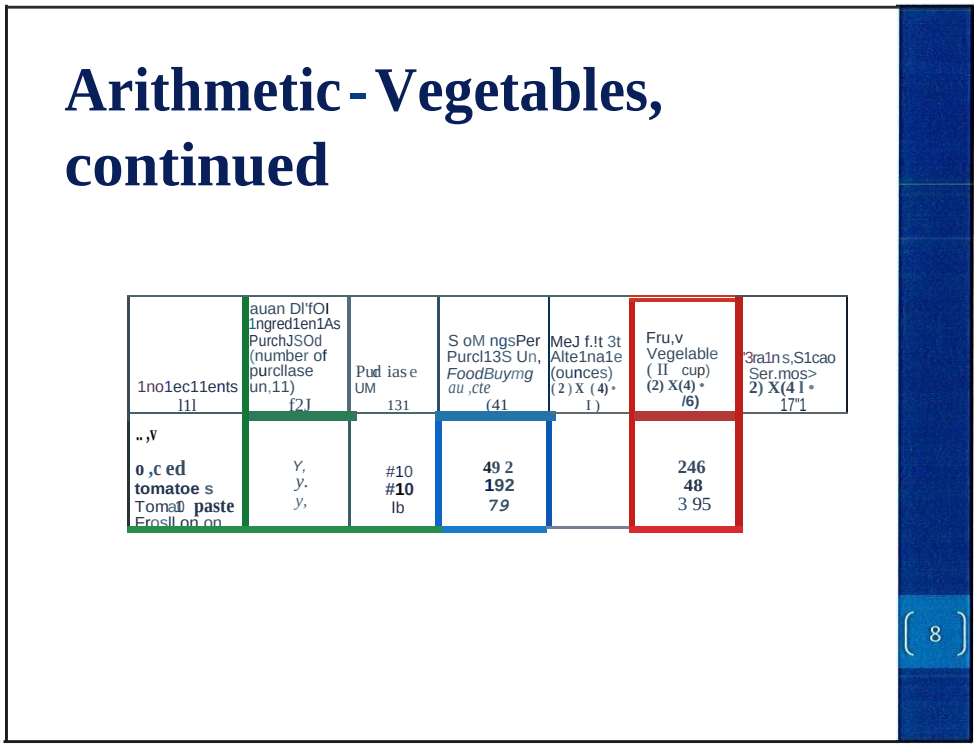
As we can see in the food buying guide, 1 Number 10 can of canned, diced tomatoe s provide 49.2 servings of X cup heated, vegetable and juice. (click)
We can also see that onenumber 10 can of tomato paste provides 192 serving s of X cup vegetable. (click)
And also, we can see that 1 pound of onions provide 7.9 servings of X cup vegetable. (click)

We are going to record all of these figures in our ser vings p er purchase unit column on our worksheet.

We are going to take the serving s per purchase unit from the food buying guide and record it on the practice worksheet. (click)

We will fill outcolumn six on the next slide.

Arithmetic - Vegetables, continued



As we can see column 2 x column 4 will give us column 6.

For diced tomatoe s, we are going to take our 49.2 from the food buying guide (click), and multiply by .5 (click). This gives us 24.6 (click) .
For tomato paste, we are going to take 192 from the food buying guide, and multiply by .25. This gives us 48.
For the onions, we are going to take 7.9 from the food buying guide, and multiply by.5. This gives us 3.95.

We will complete the totals on the following slide .

Totals - Top

J;OMPONENT CONTRIBUTION WORKSHEET
ANSWER

Recipe Name: Chili withBeans **Portio ns per Recipe:** 50 cups

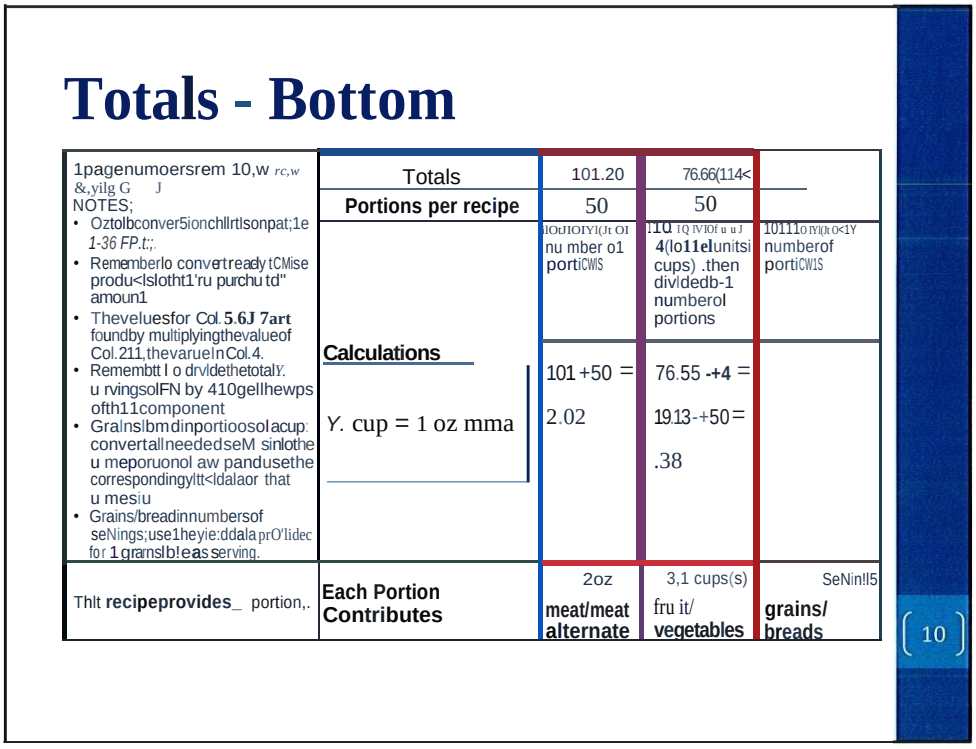
Ingredients (11	uuanmyof Ingredient As Purchased (numberof **purchase** units) 12	**Purchase** Un 131	FoodBuying Gulde 141	Alternate Me a.M eat (ounce,) (2)X (4) =	F ru it/ Vegetable (1/4 cup) (2)Xf =	Oralnsiaread (Serving•) (2)XCfii=
Groundbeef	7 %	Lb	11.8	82.6		
Pinlo beane		#10 can	37.2	18.6		
Diced **tomatoes**	% 14	#10	49.2		**24 .6**	
Tomato paste	%	#10	192		**46**	
Fresh onion		lb	7.9		3.95	
Buyt, g Gu.'*) NOi ES :		**Tota l s**		10 1.20	76.5S(1Hc	
		Portions per recipe		50	50	

9

By now, your practice worksheet should be filled out and look like this, except for the tot als.

Add column 5, and total at the bottom. Likew ise, add column 6 and total at the bottom. Fill in the port ions per recipe of 50, as previously addresse d. Remember, column 6 is all in cup format, as this is how vegetables are listed in the food buying guide.

We will complete the bottom of the totals on the following slide.



After we have totaled column 5 and column 6, we now have to di vide by portion .

(click) For column 5, we are adding th e amounts from the ground beef and the pinto beans. 101.2 ounces /50 ser vings = 2.02 ounces per ser ving. We will round down to 2 ounce equivalent s per serving.

Plea se note - As a reminde r for this example, we are credit ing the pinto beans as a meat/meat alt ernat e. This is somewhat uncommon , but is allowable . Fo r crediti ng purposes, X c of legume s credit as 1 oz of meat/meat alt ernate. Since the legume s are already in this X c format from the food buying guide, no conversion w ill be needed.

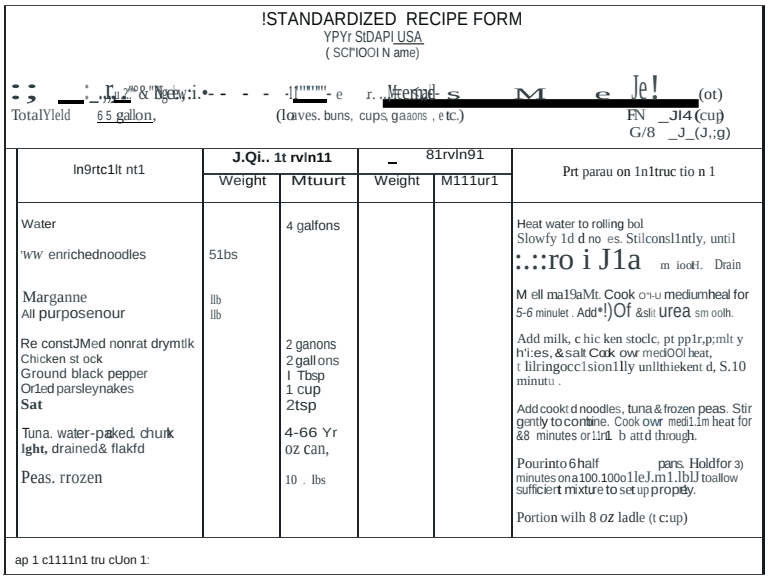
(click) For column 6, we are adding the tomat oe s, tomato paste, and onions. We have 76.55 X cups afte r tot aling the vegetables. Before dividingby the number of servings, lets first convert from quarter-cups to cups.

We will take 76.55 quarter-cups divided by 4, giving us 19 .13 cup s. Now, we will take our 19.13 cups and divide by the 50 servings, giving us .38 cups per serving.. 38 cups= 3/8 cup of vegetable per serving .

Each 1 cup serving of the chili provides 2 oz eq meat/meat alt ernate, and 3/8 cup vegetable. As a reminder, the recipe we used for this example is not standardized , and

may need adjustments before being cooked .

Let's try it again!



!STANDARDIZED RECIPE FORM

YPYr StDAPI USA

(SCI'IOOI N ame)

TotalYleld 6 5 gallon, (lo.ves. buns, cups, ga.aons , e tc.) FN _J14 (cup) G/8 _J_(J,;g)

In9rtc1lt nt1	J.Qi.. 1t rvin11 Weight	Mtuurt	81rvln91 Weight	M111ur1	Prt parau on 1n1truc tio n 1
Water		4 galfons			Heat water to rolling bol Slowfy 1d d no es. Stilconsl1ntly, until :.::ro i J1a m iool. Drain
ww enrichednoodles	51bs				
Marganne	llb				M ell ma19aMt. Cook o-1-u mediumheal for 5-6 minulet . Add*!)Of &slit urea sm oolh.
All purposenour	llb				
Re constJMed nonrat drymtlk		2 ganons			Add milk, c hic ken stoclc, pt pp1r,p;mlt y h'i:es, & salt Cook owr medOOl heat, t lilringocc1sion1lly unllthiekent d, S.10 minutu .
Chicken st ock		2 gall ons			
Ground black pepper		I Tbsp			
Or1ed parsleynakes		1 cup			
Sat		2tsp			
Tuna. water-paked. chunk lght, drained& flakfd		4-66 Yr oz can,			Add cookt d noodles, tuna & frozen peas. Stir gently to contine. Cook owr medi1.1m heat for &8 minutes or 1.1n1. b att d through.
Peas. rrozen		10 . lbs			Pourinto 6 half pans. Holdfor 3) minutes ona 100.100o1leJ.m1.lbIJ toallow sufficient mixture to set up propely.
					Portion wilh 8 oz ladle (t c:up)

ap 1 c1111n1 tru cUon 1:

11

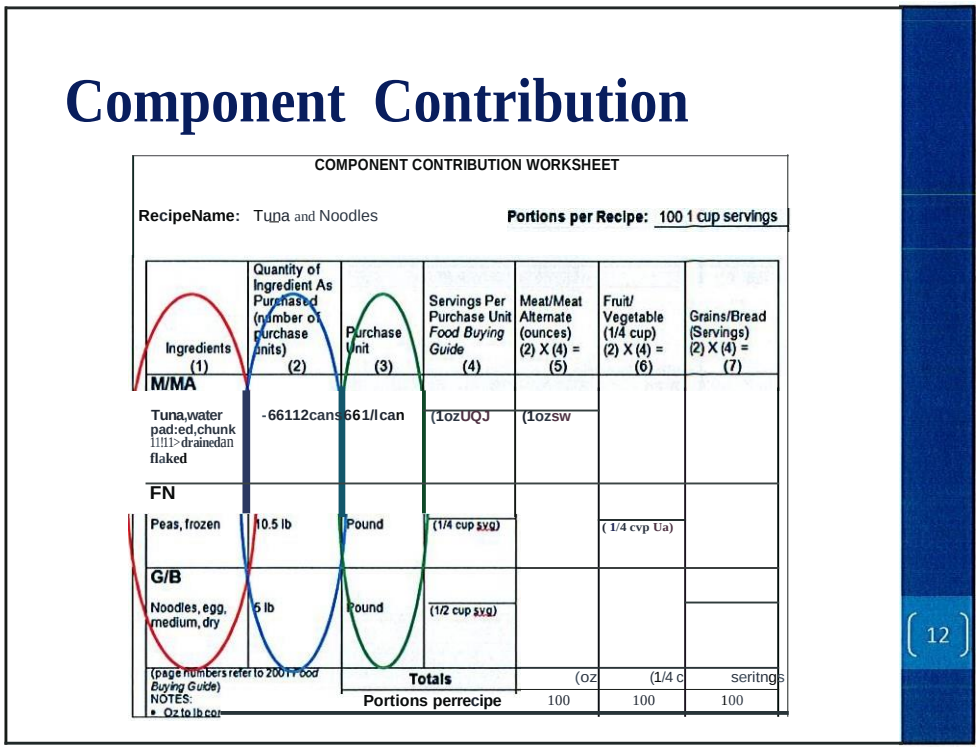
Here we have another recipe displayed. This recipe is for a Tuna Noodle casserole, serving 100 portions at 1 cup apiece.

The ingredients associated with crediting include as follo ws:

- Whole Wheat enriched noodles at 5 lbs.
- Tuna, water-packed, chunk light, drained & flaked at 4 66 *Yi* oz cans
- Peas, frozen at 10 *Yi* lbs

On the following slide, we are going to look at the component contribution worksheet.

Component Contribution



COMPONENT CONTRIBUTION WORKSHEET

RecipeName: Tuna and Noodles **Portions per Recipe:** 100 1 cup servings

Ingredients (1)	Quantity of Ingredient As Purchased (number of purchase units) (2)	Purchase Unit (3)	Servings Per Purchase Unit *Food Buying Guide* (4)	Meat/Meat Alternate (ounces) (2) X (4) = (5)	Fruit/ Vegetable (1/4 cup) (2) X (4) = (6)	Grains/Bread (Servings) (2) X (4) = (7)
M/MA						
Tuna,water pad:ed,chunk 11!11>drainedan flaked	-66112cans	661/lcan	(1ozUQJ	(1ozsw		
FN						
Peas, frozen	10.5 lb	Pound	(1/4 cup svg)		(1/4 cvp Ua)	
G/B						
Noodles, egg, medium, dry	5 lb	Pound	(1/2 cup svg)			
(page numbers refer to 2001 Food *Buying Guide*)		**Totals**		(oz	(1/4 c	seritngs
NOTES: • Oz to lb co		**Portions perrecipe**		100	100	100

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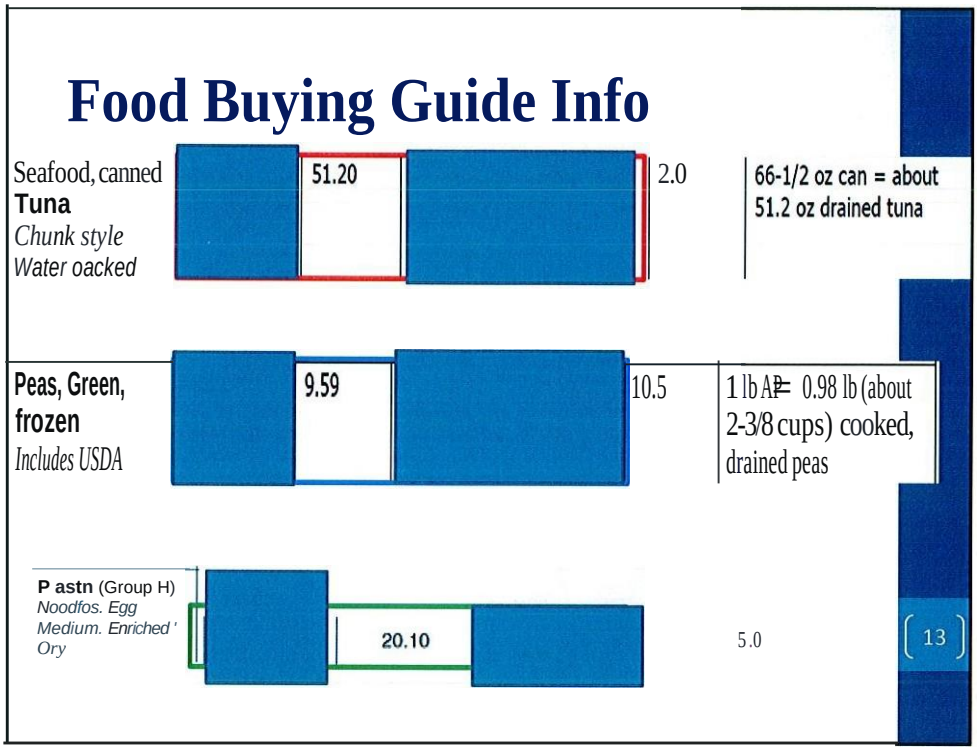
Here, we have listed the creditable items from the previous recipe. (click)

Additionally, we have listed the quantities needed, as listedin the recipe. (click)

Also, we have listed the purchase unit. This is the unit which the corresponding product is to be purchased in. This is important , as this is how you will locate the product in the food buying guide. (click)

On the coming slides, we will complete the rest of the worksheet. In order to complete the rest of the worksheet, we will need to look up the items in the food buying guide, and do a little math.



Here we have the food buying guide information for the credit able food items.

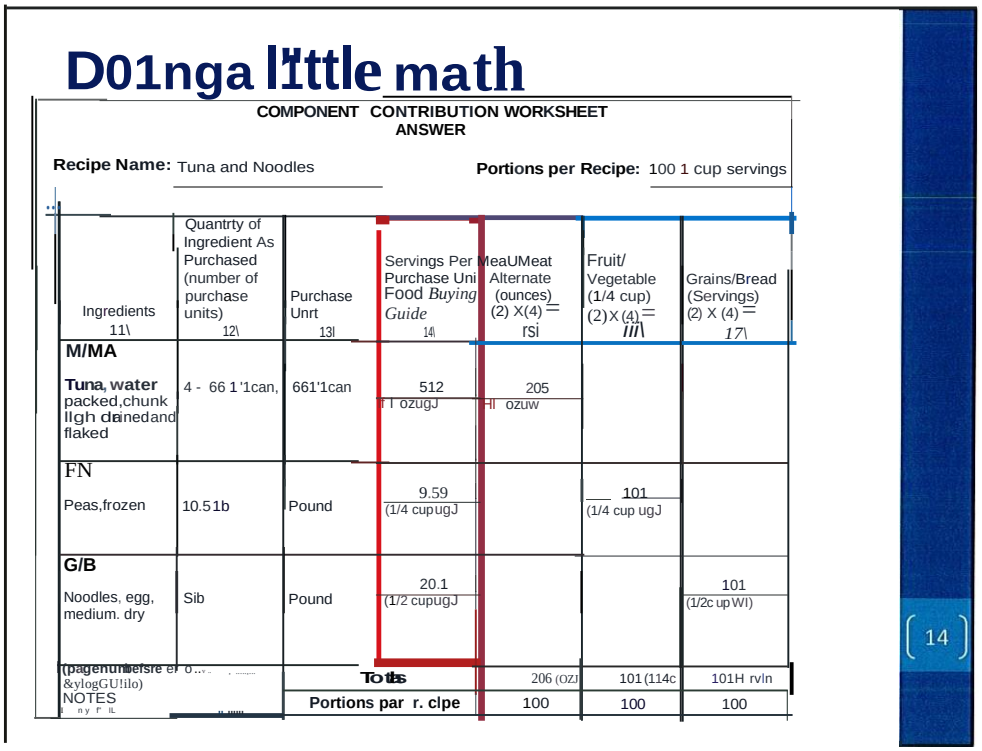
For the Tuna, we can see that one 66*Yi* oz can provides 51.2 serving s at one ounce. (click).

For the Peas, we can see that 1 pound of frozen peas pro vide 9.59 servings of a X cup cooked, drained vegetable (click).

For the Egg Noodles, we can see that 1 pound of egg noodles provide 20.1 servings of *Yi* cup cooked pasta. (click)

The numbers we will be adding to our worksheet are the num ber of servings per purchase unit. (click). We have covered up the other information for your convenience .

On the next slide, we are going to put these numbers to work.



D01nga l'ttle math

COMPONENT CONTRIBUTION WORKSHEET
ANSWER

Recipe Name: Tuna and Noodles **Portions per Recipe:** 100 1 cup servings

Ingredients 11\	Quantrty of Ingredient As Purchased (number of purchase units) 12\	Purchase Unrt 13l	Servings Per Purchase Uni Food *Buying Guide* 14\	MeaUMeat Alternate (ounces) (2) X(4) = rSi	Fruit/ Vegetable (1/4 cup) (2) X (4) = ///\	Grains/Bread (Servings) (2) X (4) = 17\
M/MA						
Tuna, water packed,chunk llgh drained and flaked	4 - 66 1 '1can,	661'1can	512 f I ozugJ	205 -II ozuw		
FN						
Peas,frozen	10.51b	Pound	9.59 (1/4 cup ugJ		101 (1/4 cup ugJ	
G/B						
Noodles, egg, medium. dry	Sib	Pound	20.1 (1/2 cup ugJ			101 (1/2c up WI)
(page num bers re e' 6... &ylogGUilo) NOTES		**To tbs**		206 (OZJ	101 (114c	101H rvln
		Portions par r. clpe		100	100	100

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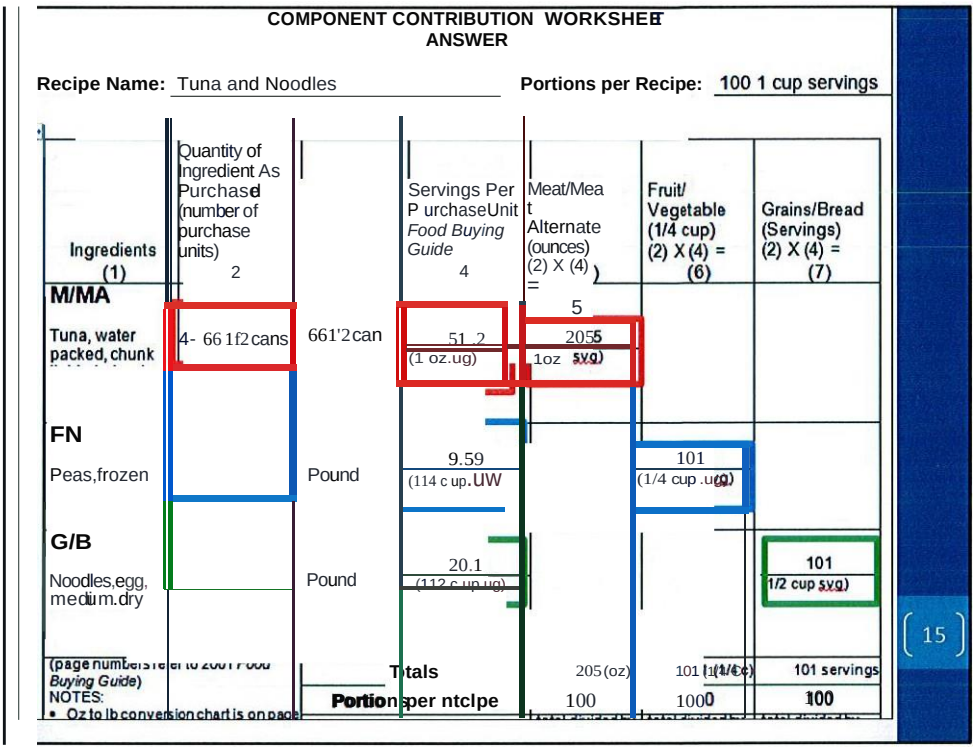
The red border identifies the ser vings per purchase unit, which we found in the food buying guide, and had listed on the previous slid e.

Read the in st r uctions on column 5, 6, and 7. (click).
In all column s, we are taking the figure from 2 multiplied by the figu re from column 4.

We will look more closely at these figures on the following sl id e.



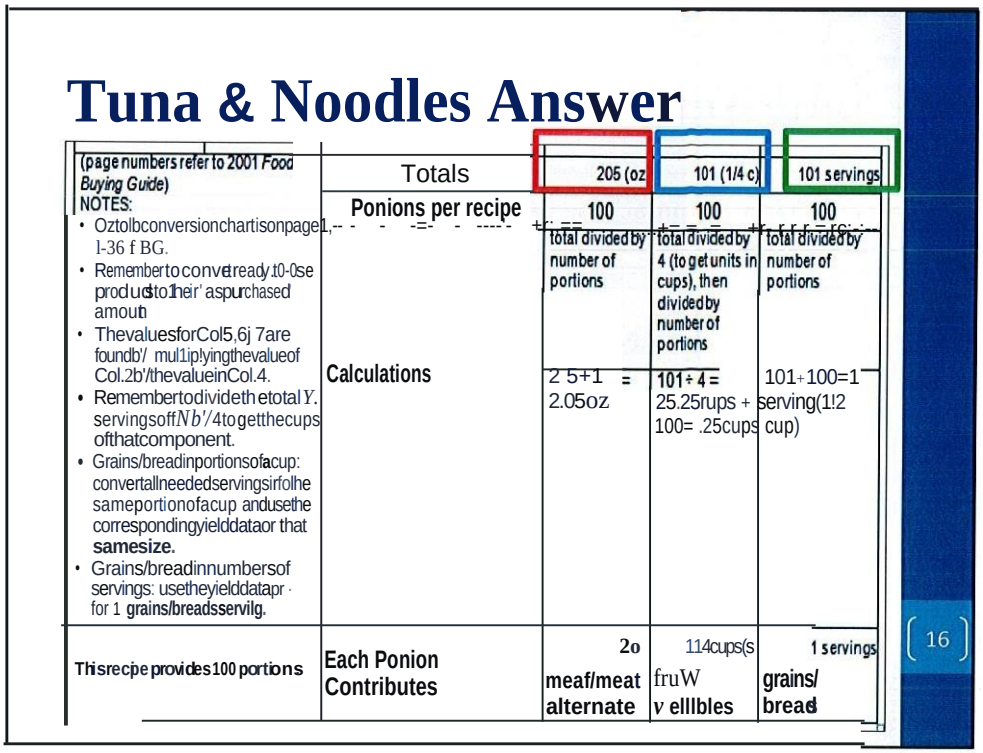
(click) In the red, when we take the number of cans, 4, multiplied by the servings per can according to the food buying guide, 51.2, we get 205 ounces. Report this in column 5, the Meat column.

(click) in the blue, when we take the number of pounds, 10.5, multiplied by the servings per pound according to the food buying guide, 9.59, we get 101 servings . Report this in column 6, the vegetable column. Remember, vegetables are listed in }{ c servings in the food buying guide.

(click) in the green, when we take the number of pounds, 5, multiplied by the number of servings per pound according to the food buying guide, 20.1, we get 101 servings . Report this in column 7, the grain column.

One note about grain. In most cases, recipes involving pasta will require the pasta to be boiled first, before addingto the pan. Use the Food Buying Guide for component crediting in this case. In the event of adding dry pasta to a recipe, such as lasagna, consult the additional notes in the food buying guide, or use the total ounces of dry pasta added to the recipe, and credit ounce-for-ounce, as described in Group H of the Grain/Bread chart .

We will look at the bottom calculations of this worksheet on t he coming slide.



After calculating our column 2 multiplied by column 4, we brought our totals down to the total line.

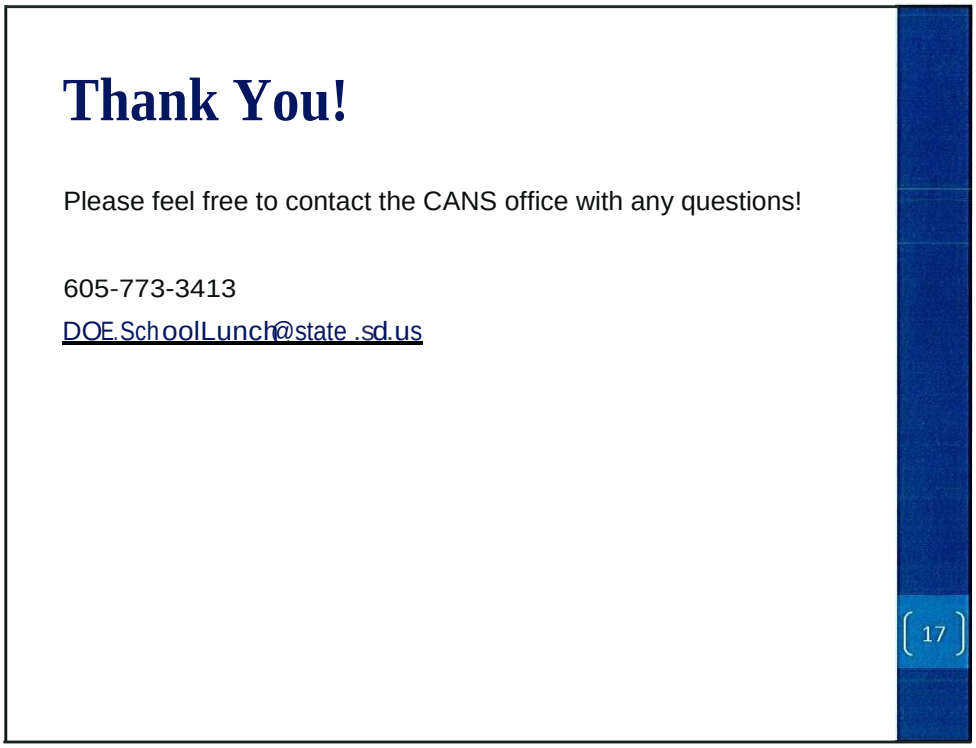
As we can see, we have the total of the meat column - column 5 - listed in red(click)
We have the vegetable total - column 6 - listed in blue (click)
And we have the grain total - column 7 - listed in green (click).

We now have to divide by the port ions per recipe. In this case, 100 .

For the meat, we take our 205 ounces and divide by 100, giving us 2 ounce s per portion .

Remember, for vegetables, we first have to convert into cup form, which means we have to take our quarter-cup total and divide by 4.
We will take our 101 X cups and divide by 4, giving us 25.25 cups. Then, we divide by our 100 servings, giving us .25 cups, or X cup vegetable per serving.

For grain, we take our 101 servings divided by 100, giving us 1 *Yi* cup serving, or 1 ounce equivalent.



Thank you for observing this training on component contribution. Please feel free to re-watch the training, and pause where necessary, and contact the CANS office with any questions.

The certificate of completion is available on the following slide.

Component Crediting Training
Professional Standards Training Credit

Prine sign&date thiscertificateforyourrecords.

- This training credits for 30 minutes of training **in**

  Key Area 1 - Menu Planning

  1150 - Menu Planning - Menu Analysis

  Key Area 2 - Operations

  2150 - Operations - CN Labeling, Cred iting

Your Name:

Date of Training:

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Component Crediting

Can be found here: http://doe.sd.gov/cans/documents/CmpntCrdtng.pdf

Food Safety Plan

Can be found at: http://doe.sd.gov/cans/documents/FoodSafety.pdf

Food Safety Plan
HACCP-Based Standard Operating Procedures

Child and Adult Nutrition Services

Last Update: June 2012

Food Safety Plan
HACCP-Based Standard Operating Procedures

Child and Adult Nutrition Services

Last Update: June 2012

USDA NFSMI National Food Service Management Institute The University of Mississippi

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5. Date Marking and Ready-to-Eat, Potentially Hazardous Food ……..
6. Handling a Food Recall ……..
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8. Personal Hygiene ……
9. Preventing Contamination at Food Bars ……
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HACCP-Based Standard Operating Procedures Record Keeping

1. Cooking and Reheating Temperature Log …….
2. Cooling Temperature Log……..
3. Damaged or Discarded Product Log ……..
4. Food Contact Surfaces Cleaning and Sanitizing Log (Dishwasher, 3-Compartment Sink, Counters, etc.)……
5. Production Log ……..
6. Receiving Log ……
7. Refrigeration Log ……..
8. Dry Store Room Log …….
9. Thermometer Calibration Log ……
10. Food Safety Checklist ……

Cleaning and Sanitizing Food Contact Surfaces

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all food contact surfaces are properly cleaned and sanitized.

SCOPE: This procedure applies to foodservice employees involved in cleaning and sanitizing food contact surfaces.

KEY WORDS: Food Contact Surface, Cleaning, Sanitizing

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow State or local health department requirements.
3. Follow manufacturer's instructions regarding the use and maintenance of equipment and use of chemicals for cleaning and sanitizing food contact surfaces. Refer to Storing and Using Poisonous or Toxic Chemicals SOP.
4. If State or local requirements are based on the ***SD Dept of Health Food Code***, wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment:
   - Before each use
   - Between uses when preparing different types of raw animal foods, such as eggs, fish, meat, and poultry
   - Between uses when preparing ready-to-eat foods and raw animal foods, such as eggs, fish, meat, and poultry
   - Any time contamination occurs or is suspected
5. Wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment using the following procedure:
   - Wash surface with detergent solution.
   - Rinse surface with clean water.
   - Sanitize surface using a sanitizing solution mixed at a concentration specified on the manufacturer's label.
   - Place wet items in a manner to allow air drying.
6. If a 3-compartment sink is used, setup and use the sink in the following manner:
   - In the first compartment, wash with a clean detergent solution at or above 110 ^{o}F or at the temperature specified by the detergent manufacturer.
   - In the second compartment, rinse with clean water.
   - In the third compartment, sanitize with a sanitizing solution mixed at a concentration specified on the manufacturer's label or by immersing in hot water at or above 171 ^{o}F for 30 seconds. Test the chemical sanitizer concentration by using an appropriate test kit.

Cleaning and Sanitizing Food Contact Surfaces, continued

INSTRUCTIONS, continued:

7. If a dishmachine is used:
   - Check with the dishmachine manufacturer to verify that the information on the data plate is correct.
   - Refer to the information on the data plate for determining wash, rinse, and sanitization (final) rinse temperatures; sanitizing solution concentrations; and water pressures, if applicable.
   - Follow manufacturer's instructions for use.
   - Ensure that food contact surfaces reach a surface temperature of 160 ^{o}F or above if using hot water to sanitize.

MONITORING:

Foodservice employees will:

1. During all hours of operation, visually and physically inspect food contact surfaces of equipment and utensils to ensure that the surfaces are clean.
2. In a 3-compartment sink, on a daily basis:
   - Visually monitor that the water in each compartment is clean.
   - Take the water temperature in the first compartment of the sink by using a calibrated thermometer.
   - If using chemicals to sanitize, test the sanitizer concentration by using the appropriate test kit for the chemical.
   - If using hot water to sanitize, use a calibrated thermometer to measure the water temperature. Refer to Using and Calibrating Thermometers SOPs.
3. In a dishmachine, on a daily basis:
   - Visually monitor that the water and the interior parts of the machine are clean and free of debris.
   - Continually monitor the temperature and pressure gauges, if applicable, to ensure that the machine is operating according to the data plate.
   - For hot water sanitizing dishmachine, ensure that food contact surfaces are reaching the appropriate temperature by placing a piece of heat sensitive tape on a smallware item or a maximum registering thermometer on a rack and running the item or rack through the dishmachine.
   - For chemical sanitizing dishmachine, check the sanitizer concentration on a recently washed food-contact surface using an appropriate test kit.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Wash, rinse, and sanitize dirty food contact surfaces. Sanitize food contact surfaces if it is discovered that the surfaces were not properly sanitized. Discard food that comes in contact with food contact surfaces that have not been sanitized properly.

Cleaning and Sanitizing Food Contact Surfaces, continued

Corrective Action, continued:

3. In a 3-compartment sink:
   - Drain and refill compartments periodically and as needed to keep the water clean.
   - Adjust the water temperature by adding hot water until the desired temperature is reached.
   - Add more sanitizer or water, as appropriate, until the proper concentration is achieved.
4. In a dishmachine:
   - Drain and refill the machine periodically and as needed to keep the water clean.
   - Contact the appropriate individual(s) to have the machine repaired if the machine is not reaching the proper wash temperature indicated on the data plate.
   - For a hot water sanitizing dishmachine, retest by running the machine again. If the appropriate surface temperature is still not achieved on the second run, contact the appropriate individual(s) to have the machine repaired. Wash, rinse, and sanitize in the 3-compartment sink until the machine is repaired or use disposable single service/single-use items if a 3-compartment sink is not available.
   - For a chemical sanitizing dishmachine, check the level of sanitizer remaining in bulk container. Fill, if needed. "Prime" the machine according to the manufacturer's instructions to ensure that the sanitizer is being pumped through the machine. Retest. If the proper sanitizer concentration level is not achieved, stop using the machine and contact the appropriate individual(s) to have it repaired. Use a 3-compartment sink to wash, rinse, and sanitize until the machine is repaired.

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record monitoring activities and any corrective action taken on the Food Contact Surfaces Cleaning and Sanitizing Log. The foodservice manager will verify that foodservice employees have taken the required temperatures and tested the sanitizer concentration by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the Food Contact Surfaces Cleaning and Sanitizing Log. The log will be kept on file for at least 1 year. The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Controlling Time and Temperature During Preparation

(Sample SOP)

PURPOSE: To prevent foodborne illness by limiting the amount of time that potentially hazardous foods are held in the temperature danger zone during preparation.

SCOPE: This procedure applies to foodservice employees who prepare food.

KEY WORDS: Cross-Contamination, Time and Temperature Control, Food Preparation, Temperature Danger Zone

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **State of SD Health Dept Food Code** requirements.
3. Wash hands prior to preparing foods. Refer to the Washing Hands SOP.
4. Use clean and sanitized equipment and utensils while preparing food.
5. Separate raw foods from ready-to-eat foods by keeping them in separate containers until ready to use and by using separate dispensing utensils. Refer to the Preventing Cross-Contamination During Storage and Preparation SOP.
6. Pre-chill ingredients for cold foods, such as sandwiches, salads, and cut melons, to 41 ºF or below before combining with other ingredients.
7. Prepare foods as close to serving times as the menu will allow.
8. Prepare food in small batches.
9. Limit the time for preparation of any batches of food so that ingredients are not at room temperature for more than 30 minutes before cooking, serving, or being returned to the refrigerator.
10. If potentially hazardous foods are not cooked or served immediately after preparation, quickly chill. Refer to the Cooling Potentially Hazardous Foods SOP.

MONITORING:

1. Use a clean, sanitized, and calibrated probe thermometer, preferably a thermocouple.
2. Take at least two internal temperatures from each pan of food at various stages of preparation.
3. Monitor the amount of time that food is in the temperature danger zone. It should not exceed 4 hours.

CORRECTIVE ACTIONS:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Begin the cooking process immediately after preparation is complete for any foods that will be served hot.
3. Rapidly cool ready-to-eat foods or foods that will be cooked at a later time.
4. Immediately return ingredients to the refrigerator if the anticipated preparation completion time is expected to exceed 30 minutes.
5. Discard food held in the temperature danger zone for more than 4 hours.

Controlling Time and Temperature During Preparation, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record the date, product name, start and end times of production, the two temperature measurements taken, any corrective actions taken, and the amount of food prepared on the Production Log. The foodservice manager will verify that foodservice employees are taking the required temperatures and following the proper preparation procedure by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the Production Log daily. Maintain the Production Log as directed by your State agency. The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Cooking Potentially Hazardous Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all foods are cooked to the appropriate internal temperature.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Cross-Contamination, Temperatures, Cooking

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. If a recipe contains a combination of meat products, cook the product to the highest required temperature.
4. According to **SD Health Dept Food Code**, cook products to the following temperatures:
    a. 145 ºF for 15 seconds
        - Seafood, beef, and pork
        - Eggs cooked to order that are placed onto a plate and immediately served
    b. 155 ºF for 15 seconds
        - Ground products containing beef, pork, or fish
        - Fish nuggets or sticks
        - Eggs held on a steam table
        - Cubed or Salisbury steaks
    c. 165 ºF for 15 seconds
        - Poultry
        - Stuffed fish, pork, or beef
        - Pasta stuffed with eggs, fish, pork, or beef (such as lasagna or manicotti)
    d. **140** ºF for 15 seconds
        - Fresh, frozen, or canned fruits and vegetables that are going to be held on a steam table or in a hot box

MONITORING:

1. Use a clean, sanitized, and calibrated probe thermometer, preferably a thermocouple.
2. Avoid inserting the thermometer into pockets of fat or near bones when taking internal cooking temperatures.
3. Take at least two internal temperatures from each batch of food by inserting the thermometer into the thickest part of the product which usually is in the center.
4. Take at least two internal temperatures of each large food item, such as a turkey, to ensure that all parts of the product reach the required cooking temperature.

Cooking Potentially Hazardous Foods, continued

(Sample SOP)

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Continue cooking food until the internal temperature reaches the required temperature.

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record product name, time, the two temperatures/times, and any corrective action taken on the Cooking and Reheating Temperature Log.

Foodservice manager will verify that foodservice employees has taken the required cooking temperatures by visually monitoring foodservice employees and preparation procedures during the shift and reviewing, initialing, and dating the temperature log at the close of each day. The Cooking and Reheating Temperature Log is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Cooling Potentially Hazardous Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all potentially hazardous foods are cooled properly.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Cross-Contamination, Temperatures, Cooling, Holding

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Modify menus, production schedules, and staff work hours to allow for implementation of proper cooling procedures.
4. Prepare and cool food in small batches.
5. Chill food rapidly using an appropriate cooling method:
   - Place food in shallow containers no more than 4 inches deep and uncovered on the top shelf in the back of the walk-in or reach-in cooler.
   - Use a quick-chill unit such as a blast chiller.
   - Stir the food in a container placed in an ice water bath.
   - Add ice as an ingredient.
   - Separate food into smaller or thinner portions.
   - Pre-chill ingredients and containers used for making bulk items such as salads.
6. Using the **SD Health Dept Food Code**, chill cooked, hot food from:
   - **140 ºF** to 70 ºF within 2 hours. Take corrective action immediately if food is not chilled from **140** ºF to 70 ºF within 2 hours.
   - 70 ºF to 41 ºF or below in remaining time. The total cooling process from **140** ºF to 41 ºF may not exceed 6 hours. Take corrective action immediately if food is not chilled from **140 ºF** to 41 ºF within the 6 hour cooling process.
7. Chill prepared, ready-to-eat foods such as tuna salad and cut melons from 70 ºF to 41 ºF or below within 4 hours. Take corrective action immediately if ready-to-eat food is not chilled from 70 ºF to 41 ºF within 4 hours.

MONITORING:

1. Use a clean, sanitized, and calibrated probe thermometer to measure the internal temperature of the food during the cooling process.
2. Monitor temperatures of products every hour throughout the cooling process by inserting a probe thermometer into the center of the food and at various locations in the product.

Cooling Potentially Hazardous Foods, continued

(Sample SOP)

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Reheat cooked, hot food to 165 ºF for 15 seconds and start the cooling process again using a different cooling method when the food is:
   - Above 70 ºF and 2 hours or less into the cooling process; and
   - Above 41 ºF and 6 hours or less into the cooling process.
3. Discard cooked, hot food immediately when the food is:
   - Above 70 ºF and more than 2 hours into the cooling process; or
   - Above 41 ºF and more than 6 hours into the cooling process.
3. Use a different cooling method for prepared ready-to-eat foods when the food is above 41 ºF and less than 4 hours into the cooling process.
4. Discard prepared ready-to-eat foods when the food is above 41 ºF and more than 4 hours into the cooling process.

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record temperatures and corrective actions taken on the Cooling Temperature Log. Foodservice employees will record if there are no foods cooled on any working day by indicating "No Foods Cooled" on the Cooling Temperature Log. The foodservice manager will verify that foodservice employees are cooling food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the temperature log each working day. The Cooling Temperature Logs are to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Date Marking Ready-to-Eat, Potentially Hazardous Food

(Sample SOP)

PURPOSE: To ensure appropriate rotation of ready-to-eat food to prevent or reduce foodborne illness from *Listeria monocytogenes.*

SCOPE: This procedure applies to foodservice employees who prepare, store, or serve food.

KEY WORDS: Ready-to-Eat Food, Potentially Hazardous Food, Date Marking, Cross-Contamination

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. The best practice for a date marking system would be to include a label with the product name, the day or date, and time it is prepared or opened. Examples of how to indicate when the food is prepared or opened include:
   - Labeling food with a calendar date, such as "cut cantaloupe, 5/26/05, 8:00 a.m.,"
   - Identifying the day of the week, such as "cut cantaloupe, Monday, 8:00 a.m.," or
   - Using color-coded marks or tags, such as cut cantaloupe, blue dot, 8:00 a.m. means "cut on Monday at 8:00 a.m."
2. Follow **SD Health Dept Food Code** requirements.
3. Label ready-to-eat, potentially hazardous foods that are prepared on-site and held for more than 24 hours.
4. Label any processed, ready-to-eat, potentially hazardous foods when opened, if they are to be held for more than 24 hours.
5. Refrigerate all ready-to-eat, potentially hazardous foods at 41 ºF or below.
6. Serve or discard refrigerated, ready-to-eat, potentially hazardous foods within 7 days.
7. Indicate with a separate label the date prepared, the date frozen, and the date thawed of any refrigerated, ready-to-eat, potentially hazardous foods.
8. Calculate the 7-day time period by counting only the days that the food is under refrigeration. For example:
   - On Monday, 8/1/05, lasagna is cooked, properly cooled, and refrigerated with a label that reads, "Lasagna, Cooked, 8/1/05."
   - On Tuesday, 8/2/05, the lasagna is frozen with a second label that reads, "Frozen, 8/2/05." Two labels now appear on the lasagna. Since the lasagna was held under refrigeration from Monday, 8/1/05 – Tuesday, 8/2/05, only 1 day is counted towards the 7-day time period.
   - On Tuesday 8/16/05 the lasagna is pulled out of the freezer. A third label is placed on the lasagna that reads, "Thawed, 8/16/05." All three labels now appear on the lasagna. The lasagna must be served or discarded within 6 days.

MONITORING:

A designated employee will check refrigerators daily to verify that foods are date marked and that foods exceeding the 7-day time period are not being used or stored.

Date Marking Ready-to-Eat, Potentially Hazardous Food, continued

(Sample SOP)

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Foods that are not date marked or that exceed the 7-day time period will be discarded.

VERIFICATION AND RECORD KEEPING:

The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Handling a Food Recall

(Sample SOP)

PURPOSE: To prevent foodborne illness in the event of a product recall.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Food Recalls

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Review the food recall notice and specific instructions that have been identified in the notice.
4. Communicate the food recall notice to feeding sites.
5. Hold the recalled product using the following steps:
   - Physically segregate the product, including any open containers, leftover product, and food items in current production that items contain the recalled product.
   - If an item is suspected to contain the recalled product, but label information is not available, follow the district's procedure for disposal.
6. Mark recalled product "Do Not Use" and "Do Not Discard." Inform the entire staff not to use the product.
7. Do not destroy any USDA commodity food without official written notification from the State Distributing Agency, USDA Food Safety Inspection Services (FSIS), or State or local health department.
8. Inform the school district's public relations coordinator of the recalled product.
9. Identify and record whether any of the product was received in the district, locate the food recall product by feeding site, and verify that the food items bear the product identification code(s) and production date(s) listed in the recall notice.
10. Obtain accurate inventory counts of the recalled products from every feeding site, including the amount in inventory and amount used.
11. Account for all recalled product by verifying inventory counts against records of food received at the feeding site.

MONITORING:

Foodservice employees and foodservice manager will visually observe that school sites have segregated and secured all recalled products.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Determine if the recalled product is to be returned and to whom, or destroyed and by whom.
3. Notify feeding site staff of procedures, dates, and other specific directions to be followed for the collection or destruction of the recalled product.
4. Consolidate the recall product as quickly as possible, but no later than 30 days after the recall notification.

Handling a Food Recall, continued

(Sample SOP)

Corrective Action, continued

5. Conform to the recall notice using the following steps:
    - Report quantity and site where product is located to manufacturer, distributor, or State agency for collection. The quantity and location of the affected USDA commodity food must be submitted to the State Distributing Agency within 10 calendars days of the recall.
    - Obtain the necessary documents from the State Distributing Agency for USDA commodity foods. Submit necessary documentation for reimbursement of food costs.
    - Complete and maintain all required documentation related to the recall including:
        - Recall notice
        - Records of how food product was returned or destroyed
        - Reimbursable costs
        - Public notice and media communications
        - Correspondence to and from the public health department and State agency

VERIFICATION AND RECORD KEEPING

Foodservice employees will record the name of the contaminated food, date, time, and the reason why the food was discarded on the Damaged or Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged or Discarded Product Log each day. Maintain the Damaged or Discarded Product Logs for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Adapted from: National Food Service Management Institute. (2002). *Responding to a Food Recall.* University, MS: Author.

Holding Hot and Cold Potentially Hazardous Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all potentially hazardous foods are held under the proper temperature.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Cross-Contamination, Temperatures, Holding, Hot Holding, Cold Holding, Storage

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Follow **SD Health Dept Food Code** requirements:
   - Hold hot foods at **140 ºF** or above
   - Hold cold foods at **41 ºF** or below
4. Preheat steam tables and hot boxes.

MONITORING:

1. Use a clean, sanitized, and calibrated probe thermometer to measure the temperature of the food.
2. Take temperatures of foods by inserting the thermometer near the surface of the product, at the thickest part, and at other various locations.
3. Take temperatures of holding units by placing a calibrated thermometer in the coolest part of a hot holding unit or warmest part of a cold holding unit.
4. For hot foods held for service:
   - Verify that the air/water temperature of any unit is at **140 ºF** or above before use.
   - Reheat foods in accordance with the Reheating for Hot Holding SOP.
   - All hot potentially hazardous foods should be **140 ºF** or above before placing the food out for display or service.
   - Take the internal temperature of food before placing it on a steam table or in a hot holding unit and at least every 2 hours thereafter.
5. For cold foods held for service:
   - Verify that the air/water temperature of any unit is at 41 ºF or below before use.
   - Chill foods, if applicable, in accordance with the Cooling Potentially Hazardous Foods SOP.
   - All cold potentially hazardous foods should be 41 ºF or below before placing the food out for display or service.
   - Take the internal temperature of the food before placing it onto any salad bar, display cooler, or cold serving line and at least every 2 hours thereafter.
6. For cold foods in storage:
   - Take the internal temperature of the food before placing it into any walk-in cooler or reach-in cold holding unit.
   - Chill food in accordance with the Cooling Potentially Hazardous Foods SOP if the food is not 41 ºF or below.

Holding Hot and Cold Potentially Hazardous Foods, continued

(Sample SOP)

Monitoring, continued

- Verify that the air temperature of any cold holding unit is at 41 ºF or below before use and at least every 4 hours thereafter during all hours of operation.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. For hot foods:
   - Reheat the food to 165 ºF for 15 seconds if the temperature is found to be below **140 ºF** and the last temperature measurement was **140 ºF** or higher and taken within the last 2 hours. Repair or reset holding equipment before returning the food to the unit, if applicable.
   - Discard the food if it cannot be determined how long the food temperature was below **140 ºF**.
3. For cold foods:
   - Rapidly chill the food using an appropriate cooling method if the temperature is found to be above 41 ºF and the last temperature measurement was 41 ºF or below and taken within the last 2 hours:
     - Place food in shallow containers (no more than 4 inches deep) and uncovered on the top shelf in the back of the walk-in or reach-in cooler.
     - Use a quick-chill unit like a blast chiller.
     - Stir the food in a container placed in an ice water bath.
     - Add ice as an ingredient.
     - Separate food into smaller or thinner portions.
4. Repair or reset holding equipment before returning the food to the unit, if applicable.
5. Discard the food if it cannot be determined how long the food temperature was above 41 ºF.

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record temperatures of food items and document corrective actions taken on the Hot and Cold Holding Temperature Log. A designated foodservice employee will record air temperatures of coolers and cold holding units on the Refrigeration Logs. The foodservice manager will verify that foodservice employees have taken the required holding temperatures by visually monitoring foodservice employees during the shift and reviewing the temperature logs at the close of each day. The temperature logs are to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Personal Hygiene

(Sample SOP)

PURPOSE: To prevent contamination of food by foodservice employees.

SCOPE: This procedure applies to foodservice employees who handle, prepare, or serve food.

KEY WORDS: Personal Hygiene, Cross-Contamination, Contamination

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Follow the Employee Health Policy. (Employee health policy is not included in this resource.)
4. Report to work in good health, clean, and dressed in clean attire.
5. Change apron when it becomes soiled.
6. Wash hands properly, frequently, and at the appropriate times.
7. Keep fingernails trimmed, filed, and maintained so that the edges are cleanable and not rough.
8. Avoid wearing artificial fingernails and fingernail polish.
9. Wear single-use gloves if artificial fingernails or fingernail polish are worn.
10. Do not wear any jewelry except for a plain ring such as a wedding band.
11. Treat and bandage wounds and sores immediately. When hands are bandaged, single-use gloves must be worn.
12. Cover a lesion containing pus with a bandage. If the lesion is on a hand or wrist, cover with an impermeable cover such as a finger cot or stall and a single-use glove.
13. Eat, drink, use tobacco, or chew gum only in designated break areas where food or food contact surfaces may not become contaminated.
14. Taste food the correct way:
    - Place a small amount of food into a separate container.
    - Step away from exposed food and food contact surfaces.
    - Use a teaspoon to taste the food. Remove the used teaspoon and container to the dish room. Never reuse a spoon that has already been used for tasting.
    - Wash hands immediately.
15. Wear suitable and effective hair restraints while in the kitchen.

MONITORING:

- A designated foodservice employee will inspect employees when they report to work to be sure that each employee is following this SOP.
- The designated foodservice employee will monitor that all foodservice employees are adhering to the personal hygiene policy during all hours of operation.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Discard affected food.

Personal Hygiene, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will verify that foodservice employees are following this SOP by visually observing the employees during all hours of operation. The foodservice manager will complete the Food Safety Checklist daily. Foodservice employees will record any discarded food on the Damaged or Discarded Product Log. The Food Safety Checklist and Damaged or Discarded Product Logs are to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Preventing Contamination at Food Bars

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all items held on food bars are protected from contamination.

SCOPE: This procedure applies to anyone who is responsible for maintaining and monitoring the self-service food bars.

KEY WORDS: Contamination, Self-Service, Salad Bars, Food Bars

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Follow Employee Health Policy, Personal Hygiene, and Washing Hands SOPs. (Employee health policy is not included in this resource.)
4. Follow manufacturer's instructions for pre-heating and pre-chilling food bar equipment before use.
5. Place all exposed food under sneeze guards.
6. Provide an appropriate clean and sanitized utensil for each container on the food bar.
7. Replace existing containers of food with new containers when replenishing the food bar.
8. Assist customers who are unable to properly use utensils.
9. Ensure that customers use a clean dish when returning to the food bar.
10. Store eating utensils with the handles up or in a manner to prevent customers from touching the food contact surfaces.
11. Avoid using spray chemicals to clean food bars when in use.

MONITORING:

1. Monitor and record temperatures of food in accordance with the Holding Hot and Cold Potentially Hazardous Foods SOP.
2. Continually monitor food containers to ensure that utensils are stored on a clean and sanitized surface or in the containers with the handles out of the food.
3. Continually monitor customers' use of the food bar to ensure that customers are not:
    - Touching food with their bare hands
    - Coughing, spitting, or sneezing on the food
    - Placing foreign objects in the food
    - Using the same plate for subsequent trips

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Remove and discard contaminated food.
3. Demonstrate to customers how to properly use utensils.
4. Discard the food if it cannot be determined how long the food temperature was above 41 ºF or below **140 ºF**.

Preventing Contamination at Food Bars, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will verify that foodservice employees are assigned to maintain food bars during all hours of operation. Foodservice employees will record temperatures of food items and document corrective actions taken on the Hot and Cold Holding Temperature Log. The foodservice manager will complete the Food Safety Checklist daily. This form is to be kept on file for a minimum of 1 year. Foodservice employees will document any discarded food on the Damaged or Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged or Discarded Product Log each day. The Hot and Cold Holding Temperature Log and the Damaged or Discarded Product Log are to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Preventing Cross-Contamination During Storage and Preparation

(Sample SOP)

PURPOSE: To reduce foodborne illness by preventing unintentional contamination of food.

SCOPE: This procedure applies to anyone who is responsible for receiving, storing, preparing, and serving food.

KEY WORDS: Cross-Contamination, Preparation, Contamination, Storage, Receiving

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Wash hands properly. Refer to the Washing Hands SOP.
4. Avoid touching ready-to-eat food with bare hands. Refer to Using Suitable Utensils When Handling Ready-To-Eat Foods SOP.
5. Separate raw animal foods, such as eggs, fish, meat, and poultry, from ready-to-eat foods, such as lettuce, cut melons, and lunch meats during receiving, storage, and preparation.
6. Separate different types of raw animal foods, such as eggs, fish, meat, and poultry, from each other, except when combined in recipes.
7. Store raw animal foods in refrigerators or walk-in coolers by placing the raw animal foods on shelves in order of cooking temperatures with the raw animal food requiring the highest cooking temperature, such as chicken, on the lowest shelf.
8. Separate unwashed fruits and vegetables from washed fruits and vegetables and other ready-to-eat foods.
9. Use only dry, cleaned, and sanitized equipment and utensils. Refer to Cleaning and Sanitizing Food Contact Surfaces SOP for proper cleaning and sanitizing procedure.
10. Touch only those surfaces of equipment and utensils that will not come in direct contact with food.
11. Place food in covered containers or packages, except during cooling, and store in the walk-in refrigerator or cooler.
12. Designate an upper shelf of a refrigerator or walk-in cooler as the “cooling” shelf. Uncover containers of food during the initial quick cool-down phase to facilitate cooling.
13. Clean the exterior surfaces of food containers, such as cans and jars, of visible soil before opening.
14. Store damaged goods in a separate location. Refer to Segregating Damaged Goods SOP.

MONITORING:

A designated foodservice employee will continually monitor food storage and preparation to ensure that food is not cross-contaminated.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Separate foods found improperly stored.
3. Discard ready-to-eat foods that are contaminated by raw eggs, raw fish, raw meat, or raw poultry.

Preventing Cross-Contamination During Storage and Preparation, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will visually observe that employees are following these procedures and taking all necessary corrective actions during all hours of operation. The foodservice manager will periodically check the storage of foods during hours of operation and complete the Food Safety Checklist daily. The Food Safety Checklist will be kept on file for a minimum of 1 year. Foodservice employees will document any discarded food on the Damaged and Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged and Discarded Product Log each day. The Damaged and Discarded Product Log is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Receiving Deliveries

(Sample SOP)

PURPOSE: To ensure that all food is received fresh and safe when it enters the foodservice operation and to transfer food to proper storage as quickly as possible.

SCOPE: This procedure applies to foodservice employees who handle, prepare, or serve food.

KEY WORDS: Cross-Contamination, Temperatures, Receiving, Holding, Frozen Goods, Delivery

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Schedule deliveries to arrive at designated times during operational hours.
4. Post the delivery schedule, including the names of vendors, days and times of deliveries, and drivers' names.
5. Establish a rejection policy to ensure accurate, timely, consistent, and effective refusal and return of rejected goods.
6. Organize freezer and refrigeration space, loading docks, and store rooms before deliveries.
7. Gather product specification lists and purchase orders, temperature logs, calibrated thermometers, pens, flashlights, and clean loading carts before deliveries. Refer to the Using and Calibrating Thermometers SOP.
8. Keep receiving area clean and well lighted.
9. Do not touch ready-to-eat foods with bare hands.
10. Determine whether foods will be marked with the date arrival or the "use by" date and mark accordingly upon receipt.
11. Compare delivery invoice against products ordered and products delivered.
12. Transfer foods to their appropriate locations as quickly as possible.

MONITORING:

1. Inspect the delivery truck when it arrives to ensure that it is clean, free of putrid odors, and organized to prevent cross-contamination. Be sure refrigerated foods are delivered on a refrigerated truck.
2. Check the interior temperature of refrigerated trucks.
3. Confirm vendor name, day and time of delivery, as well as driver's identification before accepting delivery. If driver's name is different from what is indicated on the delivery schedule, contact the vendor immediately.
4. Check frozen foods to ensure that they are all frozen solid and show no signs of thawing and refreezing, such as the presence of large ice crystals or liquids on the bottom of cartons.
5. Check the temperature of refrigerated foods.
    a. For fresh meat, fish, and poultry products, insert a clean and sanitized thermometer into the center of the product to ensure a temperature of 41 ºF or below. The temperature of milk should be 45 ºF or below.

Receiving Deliveries, continued

(Sample SOP)

Monitoring, continued

   b. For packaged products, insert a food thermometer between two packages being careful not to puncture the wrapper. If the temperature exceeds 41 ºF, it may be necessary to take the internal temperature before accepting the product.
   c. For eggs, the interior temperature of the truck should be 45 ºF or below.
6. Check dates of milk, eggs, and other perishable goods to ensure safety and quality.
7. Check the integrity of food packaging.
8. Check the cleanliness of crates and other shipping containers before accepting products. Reject foods that are shipped in dirty crates.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Reject the following:
   - Frozen foods with signs of previous thawing
   - Cans that have signs of deterioration, such as swollen sides or ends, flawed seals or seams, dents, or rust
   - Punctured packages
   - Foods with out-dated expiration dates
   - Foods that are out of safe temperature zone or deemed unacceptable by the established rejection policy

VERIFICATION AND RECORD KEEPING:

Record the temperature and the corrective action on the delivery invoice or on the Receiving Log. The foodservice manager will verify that foodservice employees are receiving products using the proper procedure by visually monitoring receiving practices during the shift and reviewing the Receiving Log at the close of each day. Receiving Logs are kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Reheating Potentially Hazardous Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all foods are reheated to the appropriate internal temperature.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Cross-Contamination, Temperatures, Reheating, Holding, Hot Holding

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Using **SD Health Dept Food Code***,* heat processed, ready-to-eat foods from a package or can, such as canned green beans or prepackaged breakfast burritos, to an internal temperature of at least **140 ºF** for 15 seconds for hot holding.
4. Reheat the following products to 165 ºF for 15 seconds:
   - Any food that is cooked, cooled, and reheated for hot holding
   - Leftovers reheated for hot holding
   - Products made from leftovers, such as soup
   - Precooked, processed foods that have been previously cooled
5. Reheat food for hot holding in the following manner if using a microwave oven:
   - Heat processed, ready-to-eat foods from a package or can to at least **140 ºF** for 15 seconds
   - Heat leftovers to 165 ºF for 15 seconds
   - Rotate (or stir) and cover foods while heating
   - Allow to sit for 2 minutes after heating
6. Reheat all foods rapidly. The total time the temperature of the food is between 41 ºF and 165 ºF may not exceed 2 hours.
7. Serve reheated food immediately or transfer to an appropriate hot holding unit.

MONITORING:

1. Use a clean, sanitized, and calibrated probe thermometer.
2. Take at least two internal temperatures from each pan of food.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Continue reheating and heating food if the internal temperature does not reach the required temperature.

Reheating Potentially Hazardous Foods, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record product name, time, the two temperatures/times, and any corrective action taken on the Cooking and Reheating Temperature Log. Foodservice manager will verify that foodservice employees have taken the required reheating temperatures by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the Cooking and Reheating Temperature Log at the close of each day. The temperature logs are kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Serving Food

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that all foods are served in a sanitary manner.

SCOPE: This procedure applies to foodservice employees who serve food.

KEY WORDS: Cross-Contamination, Service

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Follow the employee health policy. (Employee health policy is not included in this resource.)
4. Wash hands before putting on gloves, each time the gloves are changed, when changing tasks, and before serving food with utensils. Refer to the Washing Hands SOP.
5. Avoid touching ready-to-eat foods with bare hands. Refer to the Using Suitable Utensils when Handling Ready-To-Eat Foods SOP.
6. Handle plates by the edge or bottom; cups by the handle or bottom; and utensils by the handles.
7. Store utensils with the handles up or by other means to prevent contamination.
8. Hold potentially hazardous food at the proper temperature. Refer to the Holding Hot and Cold Potentially Hazardous Foods SOP.
9. Serve food with clean and sanitized utensils.
10. Store in-use utensils properly. Refer to the Storing In-Use Utensils SOP.
11. Date mark and cool potentially hazardous foods or discard leftovers. Refer to the Date Marking Ready-to-Eat, Potentially Hazardous Foods, and Cooling Potentially Hazardous Foods SOPs.

MONITORING:

A designated foodservice employee will visually observe that food is being served in a manner that prevents contamination during all hours of service.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Replace improperly handled plates, cups, or utensils.
3. Discard ready-to-eat food that has been touched with bare hands.
4. Follow the corrective actions identified in the Washing Hands; Using Suitable Utensils When Handling Ready-To-Eat Foods; Date Marking Ready-to-Eat, Potentially Hazardous Foods; Cooling Potentially Hazardous Foods; and Holding Hot and Cold Potentially Hazardous Foods SOPs.

Serving Food, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will periodically check the storage and use of utensils during service. In addition, the foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Storing and Using Poisonous or Toxic Chemicals

(Sample SOP)

PURPOSE: To prevent foodborne illness by chemical contamination.

SCOPE: This procedure applies to foodservice employees who use chemicals in the kitchen.

KEY WORDS: Chemicals, Cross-Contamination, Contamination, Material Safety Data Sheet

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Designate a location for storing the Material Safety Data Sheets (MSDS).
4. Follow manufacturer's directions for specific mixing, storing, and first aid instructions on the chemical containers in the MSDS.
5. Label and date all poisonous or toxic chemicals with the common name of the substance.
6. Store all chemicals in a designated secured area away from food and food contact surfaces using spacing or partitioning.
7. Limit access to chemicals by use of locks, seals, or key cards.
8. Maintain an inventory of chemicals.
9. Store only chemicals that are necessary to the operation and maintenance of the kitchen.
10. Mix, test, and use sanitizing solutions as recommended by the manufacturer and the State or local health department.
11. Use the appropriate chemical test kit to measure the concentration of sanitizer each time a new batch of sanitizer is mixed.
12. Do not use chemical containers for storing food or water.
13. Use only hand sanitizers that comply with the *2001 FDA Food Code.* Confirm with the manufacturer that the hand sanitizers used meet the requirements of the *2001 FDA Food Code.*
14. Label and store first aid supplies in a container that is located away from food or food contact surfaces.
15. Label and store medicines for employee use in a designated area and away from food contact surfaces. Do not store medicines in food storage areas.
16. Store refrigerated medicines in a covered, leak proof container where they are not accessible to children and cannot contaminate food.

MONITORING:

Foodservice employees and foodservice manager will visually observe that chemicals are being stored, labeled, and used properly during all hours of operation.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Discard any food contaminated by chemicals.
3. Label and properly store any unlabeled or misplaced chemicals.

Storing and Using Poisonous or Toxic Chemicals, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is completed. Foodservice employees will record the name of the contaminated food, date, time, and the reason why the food was discarded on the Damaged and Discarded Product Log. The foodservice manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged and Discarded Product Log each day. The Food Safety Checklist and Damaged and Discarded Product Logs are kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Transporting Food to Remote Sites (Satellite Kitchens)

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that food temperatures are maintained during transportation and contamination is prevented.

SCOPE: This procedure applies to foodservice employees who transport food from a central kitchen to remote sites (satellite kitchens).

KEY WORDS: Hot Holding, Cold Holding, Reheating, Cooling, Transporting Food

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. According to **SD Health Dept Food Code**:
   - Keep frozen foods frozen during transportation.
   - Maintain the temperature of refrigerated, potentially hazardous foods at 41 ºF or below and cooked foods that are transported hot at **140 ºF** or above.
4. Use only food carriers for transporting food approved by the National Sanitation Foundation International or that have otherwise been approved by the state or local health department.
5. Prepare the food carrier before use:
   - Ensure that all surfaces of the food carrier are clean.
   - Wash, rinse, and sanitize the interior surfaces.
   - Ensure that the food carrier is designed to maintain cold food temperatures at 41 ºF and hot food temperatures at **140 ºF** or above.
   - Place a calibrated stem thermometer in the warmest part of the carrier if used for transporting cold food, or the coolest part of the carrier if used for transporting hot food. Refer to the Using and Calibrating Thermometers SOP.
   - Pre-heat or pre-chill the food carrier according to the manufacturer's recommendations.
6. Store food in containers suitable for transportation. Containers should be:
   - Rigid and sectioned so that foods do not mix
   - Tightly closed to retain the proper food temperature
   - Nonporous to avoid leakage
   - Easy-to-clean or disposable
   - Approved to hold food
7. Place food containers in food carriers and transport the food in clean trucks, if applicable, to remote sites as quickly as possible.
8. Follow Receiving Deliveries SOP when food arrives at remote site.

Transporting Food to Remote Sites (Satellite Kitchens), continued

(Sample SOP)

MONITORING:

1. Check the air temperature of the food carrier to ensure that the temperature suggested by the manufacturer is reached prior to placing food into it.
2. Check the internal temperatures of food using a calibrated thermometer before placing it into the food carrier. Refer to the Holding Hot and Cold Potentially Hazardous Foods SOP for the proper procedures to follow when taking holding temperatures.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Continue heating or chilling food carrier if the proper air temperature is not reached.
3. Reheat food to 165 ºF for 15 seconds if the internal temperature of hot food is less than **140 ºF**. Refer to the Reheating Potentially Hazardous Foods SOP.
4. Cool food to 41 ºF or below using a proper cooling procedure if the internal temperature of cold food is greater than 41 ºF. Refer to the Cooling Potentially Hazardous Foods SOP for the proper procedures to follow when cooling food.
5. Discard foods held in the danger zone for greater than 4 hours.

VERIFICATION AND RECORD KEEPING:

Before transporting food to remote sites, foodservice employees will record food carrier temperature, food product name, time, internal temperatures, and any corrective action taken on the Hot and Cold Holding Temperature Log. Upon receipt of food at remote sites, foodservice employees will record receiving temperatures and corrective action taken on the Receiving Log. The foodservice manager at central kitchens will verify that foodservice employees are following this SOP by visually observing employees and reviewing and initialing the Hot and Cold Holding Temperature Log daily. The foodservice manager at the remote site(s) will verify that foodservice employees are receiving foods at the proper temperature and following the proper receiving procedures by visually observing receiving practices during the shift and reviewing and initialing the Receiving Log daily. All logs are kept on file for a minimum of 1 year. The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Using and Calibrating Thermometers

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that the appropriate type of thermometer is used to measure internal product temperatures and that thermometers used are correctly calibrated for accuracy.

SCOPE: This procedure applies to foodservice employees who prepare, cook, and cool food.

KEY WORDS: Thermometers, Calibration

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Follow the food thermometer manufacturer's instructions for use. Use a food thermometer that measures temperatures from 0 ºF (-18 ºC) to 220 ºF (104 ºC) and is appropriate for the temperature being taken. For example:
   - Temperatures of thin products, such as hamburgers, chicken breasts, pizza, filets, nuggets, hot dogs, and sausage patties, must be taken using a thermistor or thermocouple with a thin probe.
   - Bimetallic, dial-faced stem thermometers are accurate only when measuring temperatures of thick foods. They may not be used to measure temperatures of thin foods. A dimple mark located on the stem of the thermometer indicates the maximum food thickness that can be accurately measured.
   - Use only oven-safe, bimetallic thermometers when measuring temperatures of food while cooking in an oven.
4. Have food thermometers easily-accessible to foodservice employees during all hours of operation.
5. Clean and sanitize food thermometers before each use. Refer to the Cleaning and Sanitizing Food Contact Surfaces SOP for the proper procedure to follow.
6. Store food thermometers in an area that is clean and where they are not subject to contamination.

MONITORING:

1. Foodservice employees will use either the ice-point method or boiling-point method to verify the accuracy of food thermometers. This is known as calibration of the thermometer.
2. To use ice-point method:
   - Insert the thermometer probe into a cup of crushed ice.
   - Add enough cold water to remove any air pockets that might remain.
   - Allow the temperature reading to stabilize before reading temperature.
   - Temperature measurement should be 32 ºF ($\pm$2 ºF) [or 0 ºC ($\pm$1 ºC)]. If not, adjust according to manufacturer's instructions.
3. To use boiling-point method:
   - Immerse at least the first two inches of the probe into boiling water.
   - Allow the temperature reading to stabilize before reading temperature.
   - Reading should be 212 ºF ($\pm$2 ºF) [or 100 ºC ($\pm$1 ºC)]. This reading may vary at higher altitudes. If adjustment is required, follow manufacturer's instructions.

Using and Calibrating Thermometers, continued

(Sample SOP)

Monitoring, continued

4. Foodservice employees will check the accuracy of the food thermometers:
   - At regular intervals (at least once per week)
   - If dropped
   - If used to measure extreme temperatures, such as in an oven
   - Whenever accuracy is in question

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. For an inaccurate, bimetallic, dial-faced thermometer, adjust the temperature by turning the dial while securing the calibration nut (located just under or below the dial) with pliers or a wrench.
3. For an inaccurate, digital thermometer with a reset button, adjust the thermometer according to manufacturer's instructions.
4. If an inaccurate thermometer cannot be adjusted on-site, discontinue using it, and follow manufacturer's instructions for having the thermometer calibrated.
5. Retrain employees who are using or calibrating food thermometers improperly.

VERIFICATION AND RECORD KEEPING:

Foodservice employees will record the calibration temperature and any corrective action taken, if applicable, on the Thermometer Calibration Log each time a thermometer is calibrated. The foodservice manager will verify that foodservice employees are using and calibrating thermometers properly by making visual observations of the employees during the calibration process and all operating hours. The foodservice manager will review and initial the Calibration Log daily. The Calibration Log will be kept on file a minimum of 1 year. The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Using Suitable Utensils When Handling Ready-to-Eat Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness due to hand-to-food cross-contamination.

SCOPE: This procedure applies to foodservice employees who prepare, handle, or serve food.

KEY WORDS: Ready-to-Eat Food, Cross-Contamination

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Use proper handwashing procedures to wash hands and exposed arms prior to preparing or handling food or at anytime when the hands may have become contaminated.
4. Do not use bare hands to handle ready-to-eat foods at any time unless washing fruits and vegetables.
5. Use suitable utensils when working with ready-to-eat food. Suitable utensils may include:
   - Single-use gloves
   - Deli tissue
   - Foil wrap
   - Tongs, spoodles, spoons, and spatulas
6. Wash hands and change gloves:
   - Before beginning food preparation
   - Before beginning a new task
   - After touching equipment such as refrigerator doors or utensils that have not been cleaned and sanitized
   - After contacting chemicals
   - When interruptions in food preparation occur, such as when answering the telephone or checking in a delivery
   - When handling money
   - Anytime a glove is torn, damaged, or soiled
   - Anytime contamination of a glove might have occurred

MONITORING:

A designated foodservice employee will visually observe that gloves or suitable utensils are used and changed at the appropriate times during all hours of operation.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Discard ready-to-eat food touched with bare hands.

Using Suitable Utensils When Handling Ready-to-Eat Foods, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will verify that foodservice workers are using suitable utensils by visually monitoring foodservice employees during all hours of operation. The foodservice manager will complete the Food Safety Checklist daily. The designated foodservice employee responsible for monitoring will record any discarded food on the Damaged and Discarded Product Log. The Food Safety Checklist and Damaged and Discarded Food Log are kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Using Time Alone as a Public Health Control to Limit Bacteria Growth in Potentially Hazardous Foods

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that potentially hazardous foods are not held in the temperature danger zone for more than 4 hours before being cooked or served.

SCOPE: This procedure applies to foodservice employees that handle, prepare, cook, and serve food.

KEY WORDS: Temperatures, Holding, Time As a Public Health Control

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP. Refer to the Using and Calibrating Thermometers SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. According to **SD Health Dept Food Code**, establish written procedures that clearly identify the:
   - Specific foods for which time rather than temperature will be used to limit bacteria growth.
   - Corrective procedures that are followed to ensure that foods are cooled properly. Refer to the Cooling Potentially Hazardous Foods SOP.
   - Marking procedures used to indicate the time that is 4 hours past the point when the food is removed from temperature control, such as an oven or refrigerator.
   - Procedures that are followed when food is in the danger zone for greater than 4 hours.
4. Cook raw potentially hazardous food within 4 hours past the point when the food is removed from temperature control.
5. Serve or discard cooked or ready-to-eat food within 4 hours past the time when the food is removed from temperature control.
6. Avoid mixing different batches of food together in the same container. If different batches of food are mixed together in the same container, use the time associated with the first batch of food as the time by which to cook, serve, or discard all the food in the container.

MONITORING:

1. Foodservice employees will continually monitor that foods are properly marked or identified with the time that is 4 hours past the point when the food is removed from temperature control.
2. Foodservice employees will continually monitor that foods are cooked, served, or discarded by the indicated time.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Discard unmarked or unidentified food or food that is noted to exceed the 4-hour limit.

Using Time Alone as a Public Health Control to Limit Bacteria Growth in Potentially Hazardous Foods, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

Foodservice employees will mark or otherwise identify food as specified in the Instructions Section of this SOP. The foodservice manager will verify that foodservice employees are following this procedure by visually monitoring foodservice employees and food handling during the shift. The foodservice manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Washing Fruits and Vegetables

(Sample SOP)

PURPOSE: To prevent or reduce risk of foodborne illness or injury by contaminated fruits and vegetables.

SCOPE: This procedure applies to foodservice employees who prepare or serve food.

KEY WORDS: Fruits, Vegetables, Cross-Contamination, Washing

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow **SD Health Dept Food Code** requirements.
3. Wash hands using the proper procedure.
4. Wash, rinse, sanitize, and air-dry all food-contact surfaces, equipment, and utensils that will be in contact with produce, such as cutting boards, knives, and sinks.
5. Follow manufacturer's instructions for proper use of chemicals.
6. Wash all raw fruits and vegetables thoroughly before combining with other ingredients, including:
   - Unpeeled fresh fruit and vegetables that are served whole or cut into pieces.
   - Fruits and vegetables that are peeled and cut to use in cooking or served ready-to-eat.
7. Wash fresh produce vigorously under cold running water or by using chemicals that comply with the **SD Health Dept Food Code**. Packaged fruits and vegetables labeled as being previously washed and ready-to-eat are not required to be washed.
8. Scrub the surface of firm fruits or vegetables such as apples or potatoes using a clean and sanitized brush designated for this purpose.
9. Remove any damaged or bruised areas.
10. Label, date, and refrigerate fresh-cut items.
11. Serve cut melons within 7 days if held at 41 ºF or below. Refer to the Date Marking Ready-to-Eat, Potentially Hazardous Food SOP.
12. Do not serve raw seed sprouts to highly susceptible populations such as preschool-age children.

MONITORING:

1. The foodservice manager will visually monitor that fruits and vegetables are being properly washed, labeled, and dated during all hours of operation.
2. Foodservice employees will check daily the quality of fruits and vegetables in cold storage.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Remove unwashed fruits and vegetables service and washed immediately before being served.
3. Label and date fresh cut fruits and vegetables.
4. Discard cut melons held after 7 days.

Washing Fruits and Vegetables, continued

(Sample SOP)

VERIFICATION AND RECORD KEEPING:

The foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is being conducted as specified in this SOP. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Washing Hands

(Sample SOP)

PURPOSE: To prevent foodborne illness by contaminated hands.

SCOPE: This procedure applies to anyone who handle, prepare, and serve food.

KEY WORDS: Handwashing, Cross-Contamination

INSTRUCTIONS:

1. Train foodservice employees on using the procedures in this SOP.
2. Follow State or local health department requirements.
3. Post handwashing signs or posters in a language understood by all foodservice staff near all handwashing sinks, in food preparation areas, and restrooms.
4. Use designated handwashing sinks for handwashing only. Do not use food preparation, utility, and dishwashing sinks for handwashing.
5. Provide warm running water, soap, and a means to dry hands. Provide a waste container at each handwashing sink or near the door in restrooms.
6. Keep handwashing sinks accessible anytime employees are present.
7. Wash hands:
   - Before starting work
   - During food preparation
   - When moving from one food preparation area to another
   - Before putting on or changing gloves
   - After using the toilet
   - After sneezing, coughing, or using a handkerchief or tissue
   - After touching hair, face, or body
   - After smoking, eating, drinking, or chewing gum or tobacco
   - After handling raw meats, poultry, or fish
   - After any clean up activity such as sweeping, mopping, or wiping counters
   - After touching dirty dishes, equipment, or utensils
   - After handling trash
   - After handling money
   - After any time the hands may become contaminated
8. Follow proper handwashing procedures as indicated below:
   - Wet hands and forearms with warm, running water at least 100 ºF and apply soap.
   - Scrub lathered hands and forearms, under fingernails, and between fingers for at least 10-15 seconds. Rinse thoroughly under warm running water for 5-10 seconds.
   - Dry hands and forearms thoroughly with single-use paper towels.
   - Dry hands for at least 30 seconds if using a warm air hand dryer.
   - Turn off water using paper towels.
   - Use paper towel to open door when exiting the restroom.
9. Follow FDA recommendations when using hand sanitizers. These recommendations are as follows:

Washing Hands, continued

(Sample SOP)

Instructions, continued

- Use hand sanitizers only after hands have been properly washed and dried.
- Use only hand sanitizers that comply with the **SD Health Dept Food Code**. Confirm with the manufacturers that the hand sanitizers used meet these requirements.
- Use hand sanitizers in the manner specified by the manufacturer.

MONITORING:

1. A designated employee will visually observe the handwashing practices of the foodservice staff during all hours of operation.
2. The designated employee will visually observe that handwashing sinks are properly supplied during all hours of operation.

CORRECTIVE ACTION:

1. Retrain any foodservice employee found not following the procedures in this SOP.
2. Ask employees that are observed not washing their hands at the appropriate times or using the proper procedure to wash their hands immediately.
3. Retrain employee to ensure proper handwashing procedure.

VERIFICATION AND RECORD KEEPING:

The foodservice manager will complete the Food Safety Checklist daily to indicate that monitoring is being conducted as specified. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Safe Food Transportation, Storage, and Handling for all Child Nutrition Programs

(Sample SOP)

PURPOSE: To prevent foodborne illness by ensuring that proper food temperatures are maintained, cross-contamination is prevented during transportation, and proper food handling and storage conditions are followed for all Child Nutrition Programs (including the Special Milk Program, Fresh Fruit and Vegetable Program, After School Snack and supper meal).

SCOPE: This procedure applies to facilities or part of a facility where food is stored, prepared, or served such as on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside of a dedicated cafeteria and kitchen area. This procedure includes individuals who transport food from a kitchen (i.e. sack lunches) and store or serve food outside of a dedicated cafeteria and kitchen area. This requirement applies to all Child Nutrition Programs—school breakfast, lunch, after school snack, and supper meals, Special Milk Program, the Fresh Fruit and Vegetable Program.

INSTRUCTIONS:

1. Train individuals involved in any or all of the Child Nutrition Programs on using the procedures in this Standard Operating Procedure (SOP).
2. Follow **South Dakota Health Department Food Code** requirements.
   - Maintain the temperature of refrigerated, potentially hazardous foods at 41 ºF or below and maintain the temperature of hot, potentially hazardous foods at 140 ºF or above.
3. Wash hands thoroughly before beginning procedure, when changing tasks, before putting on gloves, and before distributing any food.
4. Sanitize surfaces where food will be prepared, distributed and consumed using an approved sanitizer and a clean rag or single use paper towel.
5. Refer to Cooking Potentially Hazardous Foods SOP for proper cooking methods and temperatures.
   - Maintain proper dry storage temperatures/condition requirements.
6. Use food carriers for transporting foods that have been approved by the South Dakota Health Department. To find the South Dakota Department of Health Foodservice Code, use the following link: http://legis.state.sd.us/rules/DisplayRule.aspx?Rule=44%3A02%3A07&Type=All
7. Prepare the food carrier before use:
   - Ensure that all surfaces of the food carrier are clean and in good condition.
   - Wash, rinse, and sanitize the interior surfaces.
   - Ensure that the food carrier is designed to maintain cold food temperatures at 41ºF or below and hot food temperatures at 140ºF or above.
   - Place a calibrated stem thermometer in the warmest part of the carrier if used for transporting cold food, or the coolest part of the carrier if used for transporting hot food. Refer to the Using and Calibrating Thermometers SOP.
   - Pre-heat or pre-chill the food carrier according to the manufacturer's recommendations.

Safe Food Transportation, Storage, and Handling for all Child Nutrition Programs, continued

(Sample SOP)

Instructions, continued

8. Store food in containers suitable for transportation. Containers should be:
   - Rigid and sectioned so that foods do not mix
   - Tightly closed to retain the proper food temperature
   - Nonporous to avoid leakage
   - Easy-to-clean or disposable
   - Approved to hold food
9. Place food containers in food carriers and transport the food in clean trucks, if applicable.
10. Protect food from contamination by covering when delivering food to service station. Deliver food as quickly as possible.
11. Discard potentially hazardous foods held in the danger zone for greater than 4 hours.
12. Service station must be set up to protect from contamination during service.
13. Refer to Serving Food SOP for proper procedures to serve food.

MONITORING:

1. Check the air temperature of the food carrier to ensure that the temperature suggested by the manufacturer is reached prior to placing food into it. Refer to the Using and Calibrating Thermometers SOP.
2. Check the internal temperatures of food using a calibrated thermometer before placing it into the food carrier. Refer to the Holding Hot and Cold Potentially Hazardous Foods SOP for the proper procedures to follow when taking holding temperatures.
3. Check and record air temperature of food store rooms and equipment daily.
4. Designated individual will monitor food distribution to ensure procedures are followed. A designated back-up should be selected in case the originally designated individual is out of the office to perform the necessary monitoring duties.
5. If refrigerated or heated foods are being served, designated individual will monitor temperature logs to ensure form is being consistently and accurately completed. Individual will also monitor correcting problems form for appropriate action and follow through.

CORRECTIVE ACTION:

1. Record any corrective action on the "correcting problems" form.
2. Retrain any individual found not following the procedures in this SOP.
3. Continue heating or chilling food carrier if the proper air temperature is not reached.
4. Reheat potentially hazardous foods to correct hot holding temperature if less than 140 ºF. Cool food to 41 ºF or below using a proper cooling procedure if the internal temperature of cold food is greater than 41 ºF. Refer to the Cooling Potentially Hazardous Foods SOP and Holding Hot and Cold Potentially Hazardous Foods SOP for the proper procedures to follow when reheating and cooling food.
5. Discard foods held in the danger zone for greater than 4 hours.

Safe Food Transportation, Storage, and Handling for all Child Nutrition Programs, continued

VERIFICATION AND RECORD KEEPING:

Before transporting food, individuals will record refrigerator temperature, food carrier temperature, food product name, time, internal temperatures, and any corrective action taken on the Hot and Cold Holding Temperature Log. Upon service of food, school employees will record receiving temperatures and corrective action taken on the Receiving Log or Correcting Problems form. A designated individual will record air temperatures of all food storage areas, coolers, and cold holding units on the Food Storage Log. The foodservice manager will verify that employees are receiving foods at the proper temperature, following the proper receiving procedures, and taking the required storage temperatures by visually observing and monitoring receiving practices where possible or checking temperature logs. All logs are kept on file for a minimum of 6 months.

DATE IMPLEMENTED:_____ BY: _____

DATE REVIEWED:_____ BY: _____

DATE REVISED:_____ BY: _____

Safe Food Transportation, Storage, and Handling for all Child Nutrition Programs
Correcting Problems

Directions: Indicate the date the problem occurred. Provide a description of the problem and the activities implemented to correct the problem.		
Date	**Problem**	**Action Taken**

HACCP-Based Standard Operating Record Keeping

Cooking and Reheating Temperature Log . . . . . .
Cooling Temperature Log . . . . . .
Damaged or Discarded Product Log . . . . . .
Food Contract Surfaces Cleaning and Sanitizing Log. . . . . .
Production Log . . . . . .
Receiving Log . . . . . .
Refrigeration Log . . . . . .
Dry Store Room Log . . . . . .
Thermometer Calibration Log . . . . . .
Food Safety Checklist . . . . . .

Cooking and Reheating Temperature Log

Instructions: Record product name, time, the two temperatures/times, and any corrective action taken on this form. The foodservice manager will verify that foodservice employees have taken the required cooking temperatures by visually monitoring foodservice employees and preparation procedures during the shift and reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Date and Time		Food Item	Internal Temperature/ Time	Internal Temperature/ Time	Corrective Action Taken	Initials	Verified By/ Date

Cooling Temperature Log

Instructions: Record temperatures every hour during the cooling cycle. Record corrective actions, if applicable. If no foods are cooled on any working day, indicate "No Foods Cooled" in the Food Item column. The foodservice manager will verify that the foodservice staff is cooling food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Date	Food Item	Time/ Temp	Time/ Temp	Time/ Temp	Time/ Temp	Time/ Temp	Time/ Temp	Corrective Actions Taken	Initials	Verified By/ Date

Damaged or Discarded Product Log

Instructions: Foodservice employees will record product name, quantity, action taken, reason, initials, and date each time a food or food product is damaged and/or will be discarded. The foodservice manager will verify that foodservice employees are discarding damaged food properly by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Date	Time	Vendor or School	Product Name	Temperature	Corrective Action Taken	Initials/Date	Manager Initials/Date

Food Contact Surfaces Cleaning and Sanitizing Log
(Dishwasher, 3-Compartment Sink, Counter Top Sanitizer)

Instructions: Record time, temperatures/sanitizer concentration, as appropriate and any corrective action taken on this form. The foodservice manager will verify that food workers have taken the required information by visually monitoring foodservice employees and preparation procedures during the shift and by reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Date and Time		Wash Temperature	Rinse Temperature	Final Rinse (Sanitization) Temperature	Heat Sensitive Tape (place here)	Sanitizer Concentration (in ppm)	Corrective Action	Employee Initials	Verified By/ Date

Production Log

Instructions: Foodservice employees will record the date, product name, start and end time of production, the two temperature measurements taken, any corrective action taken, and the amount of food prepared on the Production Log. The foodservice manager will verify that foodservice employees are taking the required temperatures and following the proper preparation procedure by visually monitoring foodservice employees during the shift and reviewing, initialing, and dating the log daily. Maintain this log as directed by your State agency.

Date	Start Time	Product Name	Temp #1	Temp #2	Amount Prepared	Corrective Actions	End Time	Employee Initials	Verified By/Date

Receiving Log

Instructions: Use this Log for deliveries or receiving foods from a centralized kitchen. Record any temperatures and corrective action taken on the Receiving Log. The foodservice manager will verify that foodservice employees are receiving products using the proper procedure by visually monitoring foodservice employees and receiving practices during the shift and reviewing the log daily. Maintain this log for a minimum of 1 year.

Date	Time	Vendor or School	Product Name	Temperature	Corrective Action Taken	Initials/Date	Manager Initials/Date

Refrigeration Log

Instructions: A designated foodservice employee will record the location or description of holding unit, date, time, air temperature, corrective action, and initials on this log. The foodservice manager will verify that foodservice employees have taken the required temperatures by visually monitoring food employees during the shift and reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Location/ Unit Description	Date	Time	Temperature	Corrective Action	Food Worker Initials	Manager Initials/ Date

Dry Store Room Log

Instructions: A designated foodservice employee will record the location or description of dry store room, date, time, air temperature, corrective action, and initials on this log. The foodservice manager will verify that foodservice employees have taken the required temperatures by visually monitoring food employees during the shift and reviewing, initialing, and dating this log daily. Maintain this log for a minimum of 1 year.

Location/ Unit Description	Date	Time	Temperature	Corrective Action	Food Worker Initials	Manager Initials/ Date

Thermometer Calibration Log

Instructions: Foodservice employees will record the calibration temperature and corrective action taken, if applicable, on the Thermometer Calibration Log each a time thermometer is calibrated. The foodservice manager will verify that foodservice employees are using and calibrating thermometers properly by making visual observations of employee activities during all hours of operation. The foodservice manager will review and initial the log daily. Maintain this log for a minimum of 1 year.

Date	Thermometer Being Calibrated	Temperature Reading	Corrective Action	Initials	Manager Initials/Date

FOOD SAFETY CHECKLIST

Date_____ Observer_____

Directions: Use this checklist daily. Determine areas in your operations requiring corrective action. Record corrective action taken and keep completed records in a notebook for future reference.

PERSONAL HYGIENE	Yes	No	Corrective Action
• Employees wear clean and proper uniform including shoes.	☐	☐	_____
• Effective hair restraints are properly worn.	☐	☐	_____
• Fingernails are short, unpolished, and clean (no artificial nails).	☐	☐	_____
☐ Jewelry is limited to a plain ring, such as wedding band and a watch and no bracelets.	☐	☐	_____
• Hands are washed properly, frequently, and at appropriate times.	☐	☐	_____
• Burns, wounds, sores or scabs, or splints and water-proof bandages on hands are bandaged and completely covered with a foodservice glove while handling food.	☐	☐	_____
☐ Eating, drinking, chewing gum, smoking, or using tobacco are allowed only in designated areas away from preparation, service, storage, and ware washing areas.	☐	☐	_____
☐ Employees use disposable tissues when coughing or sneezing and then immediately wash hands.	☐	☐	_____
• Employees appear in good health.	☐	☐	_____
• Hand sinks are unobstructed, operational, and clean.	☐	☐	_____
• Hand sinks are stocked with soap, disposable towels, and warm water.	☐	☐	_____
• A handwashing reminder sign is posted.	☐	☐	_____
• Employee restrooms are operational and clean.	☐	☐	_____

FOOD PREPARATION	Yes	No	Corrective Action
• All food stored or prepared in facility is from approved sources.	☐	☐	_____
☐ Food equipment utensils, and food contact surfaces are properly washed, rinsed, and sanitized before every use.	☐	☐	_____
☐ Frozen food is thawed under refrigeration, cooked to proper temperature from frozen state, or in cold running water.	☐	☐	_____
• Thawed food is not refrozen.	☐	☐	_____
☐ Preparation is planned so ingredients are kept out of the temperature danger zone to the extent possible.	☐	☐	_____
• Food is tasted using the proper procedure.	☐	☐	_____
• Procedures are in place to prevent cross-contamination.	☐	☐	_____
☐ Food is handled with suitable utensils, such as single use gloves or tongs.	☐	☐	_____

FOOD SAFETY CHECKLIST

Date_____ Observer_____

☐ Food is prepared in small batches to limit the time it is in the temperature danger zone.	☐ ☐	_____
☐ Clean reusable towels are used only for sanitizing equipment and surfaces and not for drying hands, utensils, or floor.	☐ ☐	_____
☐ Food is cooked to the required safe internal temperature for the appropriate time. The temperature is tested with a calibrated food thermometer.	☐ ☐	_____
☐ The internal temperature of food being cooked is monitored and documented.	☐ ☐	_____

HOT HOLDING	**Yes**	**No**	**Corrective Action**
• Hot holding unit is clean.	☐	☐	_____
☐ Food is heated to the required safe internal temperature before placing in hot holding. Hot holding units are not used to reheat potentially hazardous foods.	☐	☐	_____
• Hot holding unit is pre-heated before hot food is placed in unit.	☐	☐	_____
• Temperature of hot food being held is at or above **140** ºF.	☐	☐	_____
• Food is protected from contamination.	☐	☐	_____

COLD HOLDING	**Yes**	**No**	**Corrective Action**
• Refrigerators are kept clean and organized.	☐	☐	_____
• Temperature of cold food being held is at or below 41 ºF.	☐	☐	_____
• Food is protected from contamination.	☐	☐	_____

REFRIGERATOR, FREEZER, AND MILK COOLER	**Yes**	**No**	**Corrective Action**
• Thermometers are available and accurate.	☐	☐	_____
• Temperature is appropriate for pieces of equipment.	☐	☐	_____
• Food is stored 6 inches off floor or in walk-in cooling equipment.	☐	☐	_____
• Refrigerator and freezer units are clean and neat.	☐	☐	_____
• Proper chilling procedures are used.	☐	☐	_____
• All food is properly wrapped, labeled, and dated.	☐	☐	_____
☐ The FIFO (First In, First Out) method of inventory management is used.	☐	☐	_____
☐ Ambient air temperature of all refrigerators and freezers is monitored and documented at the beginning and end of each shift.	☐	☐	_____

FOOD SAFETY CHECKLIST

Date_____ Observer_____

FOOD STORAGE AND DRY STORAGE	Yes	No	Corrective Action
• Temperatures of dry storage area is between 50 ºF and 70 ºF or State public health department requirement.	☐	☐	_____
• All food and paper supplies are stored 6 to 8 inches off the floor.	☐	☐	_____
• All food is labeled with name and received date.	☐	☐	_____
• Open bags of food are stored in containers with tight fitting lids and labeled with common name.	☐	☐	_____
• The FIFO (First In, First Out) method of inventory management is used.	☐	☐	_____
• There are no bulging or leaking canned goods.	☐	☐	_____
• Food is protected from contamination.	☐	☐	_____
• All food surfaces are clean.	☐	☐	_____
• Chemicals are clearly labeled and stored away from food and food-related supplies.	☐	☐	_____
• There is a regular cleaning schedule for all food surfaces.	☐	☐	_____
• Food is stored in original container or a food grade container.	☐	☐	_____

CLEANING AND SANITIZING	Yes	No	Corrective Action
• Three-compartment sink is properly set up for ware washing.	☐	☐	_____
• Dishmachine is working properly (such as gauges and chemicals are at recommended levels).	☐	☐	_____
• Water is clean and free of grease and food particles.	☐	☐	_____
• Water temperatures are correct for wash and rinse.	☐	☐	_____
• If heat sanitizing, the utensils are allowed to remain immersed in 171 ºF water for 30 seconds.	☐	☐	_____
• If using a chemical sanitizer, it is mixed correctly and a sanitizer strip is used to test chemical concentration.	☐	☐	_____
• Smallware and utensils are allowed to air dry.	☐	☐	_____
• Wiping cloths are stored in sanitizing solution while in use.	☐	☐	_____

UTENSILS AND EQUIPMENT	Yes	No	Corrective Action
• All small equipment and utensils, including cutting boards and knives, are cleaned and sanitized between uses.	☐	☐	_____
• Small equipment and utensils are washed, sanitized, and air-dried.	☐	☐	_____
• Work surfaces and utensils are clean.	☐	☐	_____

FOOD SAFETY CHECKLIST

Date_____ Observer_____

	Yes	No	Corrective Action
• Work surfaces are cleaned and sanitized between uses.	☐	☐	_____
• Thermometers are cleaned and sanitized after each use.	☐	☐	_____
• Thermometers are calibrated on a routine basis.	☐	☐	_____
• Can opener is clean.	☐	☐	_____
• Drawers and racks are clean.	☐	☐	_____
? Clean utensils are handled in a manner to prevent contamination of areas that will be in direct contact with food or a person's mouth.	☐	☐	_____

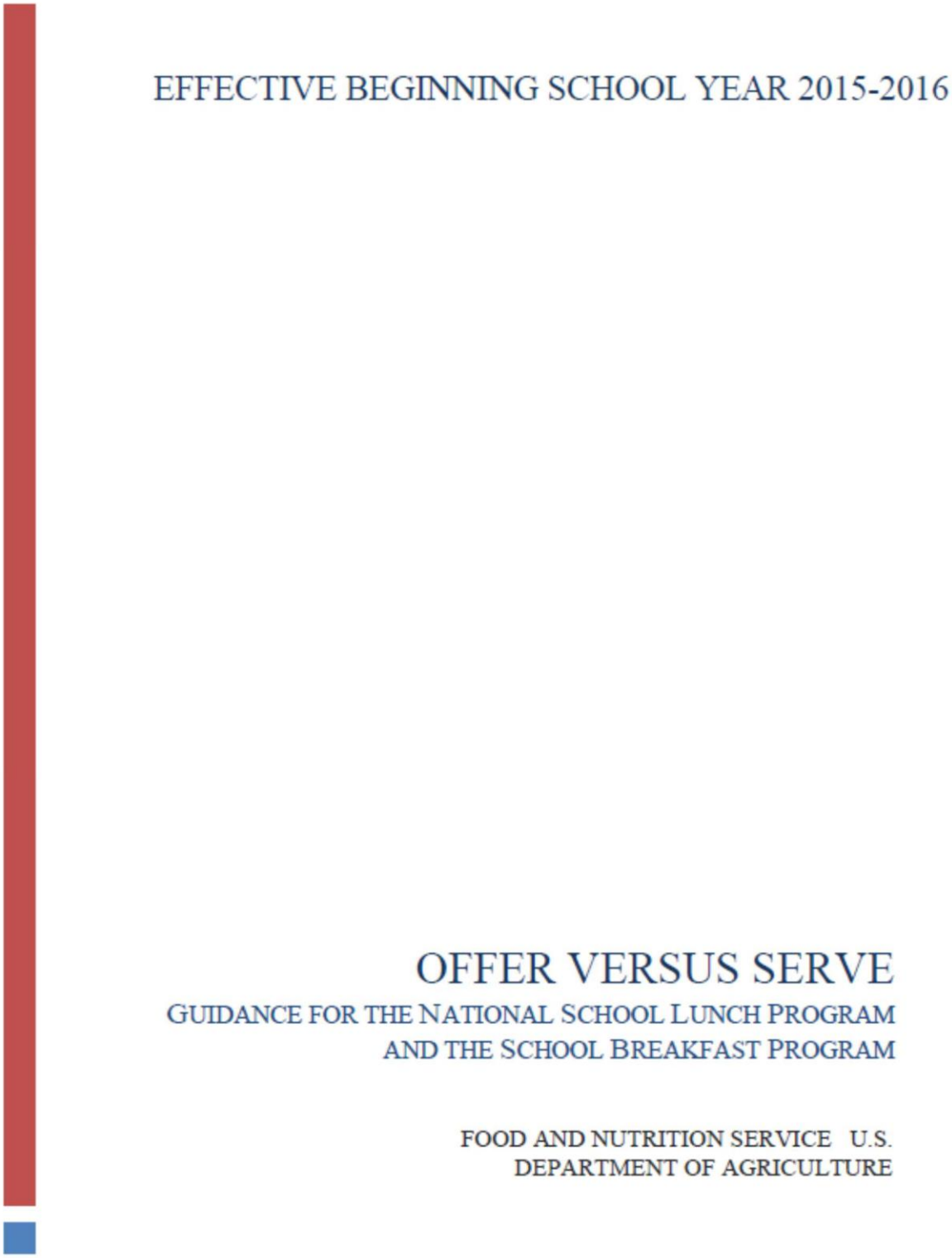
LARGE EQUIPMENT	**Yes**	**No**	**Corrective Action**
• Food slicer is clean.	☐	☐	_____
? Food slicer is broken down, cleaned, and sanitized before and after every use.	☐	☐	_____
• Boxes, containers, and recyclables are removed from site.	☐	☐	_____
• Loading dock and area around dumpsters are clean and odor-free.	☐	☐	_____
• Exhaust hood and filters are clean.	☐	☐	_____

GARBAGE STORAGE AND DISPOSAL	**Yes**	**No**	**Corrective Action**
• Kitchen garbage cans are clean and kept covered.	☐	☐	_____
• Garbage cans are emptied as necessary.	☐	☐	_____
• Boxes and containers are removed from site.	☐	☐	_____
• Loading dock and area around dumpster are clean.	☐	☐	_____
• Dumpsters are clean.	☐	☐	_____

PEST CONTROL	**Yes**	**No**	**Corrective Action**
• Outside doors have screens, are well-sealed, and are equipped with a self-closing device.	☐	☐	_____
• No evidence of pests is present.	☐	☐	_____
? There is a regular schedule of pest control by a licensed pest control operator.	☐	☐	_____

Offer VS Serve Manual

Can be found here: http://doe.sd.gov/cans/documents/Offer-Serve-Manual.pdf



EFFECTIVE BEGINNING SCHOOL YEAR 2015-2016

OFFER VERSUS SERVE

GUIDANCE FOR THE NATIONAL SCHOOL LUNCH PROGRAM AND THE SCHOOL BREAKFAST PROGRAM

FOOD AND NUTRITION SERVICE U.S.
DEPARTMENT OF AGRICULTURE

This guidance replaces the School Year 2014-2015 edition of the *Offer versus Serve* guidance.

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A *food component* is one of three food groups that comprise reimbursable breakfasts. These are: fruits (or vegetables as substitute); grains (with optional meats/meat alternates); and fluid milk. Schools must always offer all three food components in at least the minimum daily required quantities. 18

A *food item* is a specific food offered within the three food components. For the purposes of OVS, a school must offer at least four food items from the three required food components (fruits, grains, milk). Under OVS, the student must select three food items, including at least ½ cup of fruits or vegetables, to have a reimbursable breakfast. 19

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Background/General Information

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

For the National School Lunch Program (NSLP), OVS is established under section 9(a)(3) of the Richard B. Russell National School Lunch Act. OVS was extended to the School Breakfast Program (SBP) in 1985 under section 4(e) (2) of the Child Nutrition Act of 1966. The regulations on OVS for the NSLP are found at 7 CFR 210.10 (e) and for the SBP at 7 CFR 220.8 (e).

Use of OVS in the Child and Adult Care Food Program and Summer Food Service Program

OVS is optional for school food authorities (SFAs) providing meals through the at-risk afterschool meals component of the Child and Adult Care Food Program. OVS is also optional for summer meals offered by SFAs through the Summer Food Service Program or the NSLP Seamless Summer Option. When used for these programs, SFAs must follow the applicable requirements outlined in this guidance. OVS cannot be used for snacks in any program.

OVS Basics Shared by NSLP and SBP

Unit Pricing

School meals must be priced (for the paid and reduced price categories) as a unit. This means that one price is established for a complete reimbursable meal in the paid meal category and one price is established for a complete reimbursable meal in the reduced price meal category. SFAs may set different unit prices for various combinations of foods offered. For example, if students are offered reimbursable lunches centered around a variety of entrées, such as a hamburger, chef's salad, lasagna or a turkey sandwich, the SFA may set four unit prices depending on which entrée is selected.

OVS does not affect the meal's unit price established by the SFA. Students who take 3, 4, or 5 food components for lunch or 3 or more food items for breakfast pay the same price. Please note that "food components" and "food items" are defined later in the manual. The unit price is also not affected if the student selects the required serving sizes for 3 food components for lunch (or 3 food items for breakfast) and also selects less than the required serving size of additional food components.

Identifying Reimbursable Meals under OVS (Signage, Menus, and Training)

Students, servers and cashiers must be able to identify what constitutes a reimbursable meal. The NSLP regulation at 7 CFR 210.10(a)(2) requires that schools identify, near or at the beginning of serving lines, what foods constitute unit priced reimbursable meals. Schools using OVS must also identify what a student must select in order to have a reimbursable meal under OVS.

Students and their parents/guardians need to be aware of what is included in school meals—parents/guardians, so they can reinforce nutrition education messages at home; and students, so they know how to select a reimbursable meal. Signage and menus should provide clear information about allowable choices. This will help students easily build a reimbursable meal and is especially important to avoid problems at the point of service. Schools are expected to conduct training for cashiers and serving line staff so they can help students select the required food components/food items in the quantities needed for reimbursable lunches and breakfasts. Annual training is required to meet the professional standards requirements.

Signage is not required for field trips, breakfast in the classroom and other venues where signage may be problematic. However, other methods should be used to inform students what choices they have.

Offering Choices within Components is Not OVS

We continue to encourage schools to offer a variety of food choices to students; this increases the likelihood that students will select the foods and beverages they prefer, which increases consumption and reduces waste. However, it is important to recognize that offering a variety of choices within the food components and items is different from OVS.

If choices within food components or food items are offered, the menu planner must indicate to the students what choices or combination of choices the student may select to have a reimbursable meal. One common example for the SBP is cereal types. Offering four different types of cereal and instructing students to "select one" is not the same as offering four grain items. Because the student can only "select one," only one grain item (cereal) is being offered to each student, even though the student can select from several cereal options.

Another useful example for the NSLP relates to the fruits or vegetables components. The menu planner may choose to offer a variety of fruit and would instruct the student to select a specific amount. If ½ cup portions of three different fruits are offered, the menu planner could indicate that the student may select "up to two" servings. This provides food choices to the student and shows the student how to select a reimbursable lunch. Although three different fruits are offered, since the student is instructed to select up to only two servings, only two fruit items are being "offered."

It is at the menu planner's discretion to determine if variety is offered and how much a student may select. Menu planners have flexibility to offer more than the minimum requirements if they wish to do so and the dietary specifications are not exceeded. For example, the menu planner could offer four ½ cup servings of fruit and allow the student to select three or even four servings, totaling more than the minimum required offering. This is applicable to both OVS and non-OVS situations.

Meal Service Systems

There are a number of different systems used by schools to offer their students reimbursable meals. For example, a school may have cafeteria-style service, kiosks, meals in the classroom and vending machines. At the senior high school level, OVS is required at lunch unless the school or SFA demonstrates to the State agency that their system does not accommodate OVS. This is most common at residential child care institutions (RCCIs). Some of the meal systems that may not readily accommodate OVS are discussed below. Schools are strongly encouraged to modify their meal service system to incorporate OVS to the extent practicable.

Pre-Plated Meals

Pre-plated meals are those that offer all food components or food items in the quantities required for each grade group in an entirely or partially pre-served manner. Pre-plated meals must include at least the daily minimum quantities required under the applicable meal pattern. This system is often used by schools and RCCIs that have logistical limitations, such as facility or space restrictions or situations where children are unable to select the foods offered. For senior high schools, if this is the only system available for the NSLP, OVS for all or some components must be implemented unless a school/RCCI was approved by the State agency to not implement OVS.

Schools and RCCIs serving pre-plated meals are encouraged to make modifications to accommodate OVS. For example, an RCCI could offer a pre-plated entrée and give students choices for the fruits, vegetables, grain and/or milk components/food items separately to allow students to have some variety. A basket with a variety of fruits and/or a separate cooler with milk choices would be possible ways to implement OVS.

Family Style Meals

A school or RCCI may serve meals "family style." Family style meal service allows students to serve themselves from common dishes of food with assistance from supervising adults. While family style meal service allows students to make choices in selecting foods, the supervising adult should initially *offer* the full planned serving of each food component/food item to each student. Over the week, offered meals must meet all of the daily and weekly food component/food item requirements, and the weekly dietary specifications. However, since replenishment is immediately available at each table, the initial *serving* of a food component/food item may be less than the full required minimum quantity. The supervising adult

should encourage additional portions and selections to meet the full required minimum serving size as appropriate, provided dietary specifications are not exceeded.

Because of the OVS requirement for the NLSP and the SBP that each student select at least ½ cup of a fruit or vegetable, the adult supervisor must ensure that each student selects at least a ½ cup of fruit or vegetable or a combination of both during the course of a family style meal service. For additional information on family style meals, please refer to Policy Memorandum SP 35-2011, CACFP 23-2011 "*Clarification on the Use of Offer Versus Serve and Family St*yle" dated May 17, 2011 which is applicable to the NSLP, the SBP, and the Child and Adult Care Food Program. (http://www.fns.usda.gov/sites/default/files/SP35_CACFP23-2011os.pdf)

Food Bars

Schools are encouraged to use food bars and salad bars as a way to offer a wider variety of vegetables and fruits and to lower plate waste. Food and salad bars are permitted with OVS because they offer a lot of variety, which may facilitate students selecting foods they will consume.

To help students and cashiers easily identify reimbursable meals from food bars, menu planners must clearly identify the food components/food items provided on the bars and the minimum serving size for each food component/food item. The menu planner must also indicate which foods and combinations of foods the students may choose to select a reimbursable meal under OVS. Cashiers must also be trained and informed (daily, if needed) on what constitutes a reimbursable meal at the point of service. It is preferable that food and salad bars be located before the point of service. If the food service area cannot accommodate placement before the point of service, the SFA must consult with their State agency for approval of their alternate point of service system to ensure that all students select food components/food items from the bar that meet the meal pattern and OVS requirements. If the food bar is after the point of service, the SFA must have a monitor or other means approved by the Stage agency to ensure that students select the components in the required serving sizes that were credited at the point of service.

Pre-portioning is one method that may be used to ensure that students select an appropriate amount from these bars. For additional guidance on use of food bars and salad bars, please refer to Policy Memo SP 31-2013 "Salad Bars in the National School Lunch Program" dated March 27, 2013. (http://www.fns.usda.gov/sites/default/files/SP31-2013os.pdf)

Pre-Packaged Meals (Bagged or "Grab and Go" Meals)

Pre-packaged meals are allowed at all age/grade levels. For senior high schools, if this is the only system available for the NSLP, OVS for all or some components must be implemented unless a school was approved by the State agency to not implement OVS. Even with such approval, these schools are encouraged to have some food components/food items with choices and/or the option to decline, such as

fruit or milk. If these meals are offered as part of breakfast in the classroom, field trips, or for students leaving the campus for work study, OVS is not required, even at the senior high level.

Menu Planning and OVS

SFAs must plan lunches and breakfasts that meet all meal pattern requirements and provide all students access to the required meal components and quantities. In addition, menus should reflect student preferences and, as much as possible, offer choices within the components. With OVS, menu planners should examine participation and selection trends to determine what and how much food to prepare. This process results in cost savings through minimizing food waste.

If choices within components are offered, the menu planner must indicate what choices or combination of choices the student may select in order to have a reimbursable meal. For example, for grades 9-12 at least one cup of fruit must be offered in a reimbursable lunch. Additionally, the menu planner may *choose* to offer a variety of fruit. If ½ cup portions of three different fruits are offered, the menu planner would indicate that the student may select ***up to*** two ½ cup servings from any of the three fruit choices offered. This provides a variety of food choices to the student and shows the student how to select a reimbursable lunch. OVS is used in this example since the student may choose to take no fruit (as long as ½ cup of vegetables is selected).

> Offering choices within components does not constitute OVS. Schools are encouraged to give students options for entrees and side items and are required to offer a variety of milk. If students are required to select every component, the SFA is not using OVS. Under OVS, students must be allowed to decline components (except for the required ½ cup serving of fruit and/or vegetable).

It is up to the menu planner to determine whether students are allowed to select duplicate food items for school meals, and it is important that this information be communicated to school nutrition staff and students clearly (such as through signage or on menus). It is also recommended that menu planners allow this practice in a consistent manner, in order to minimize confusion among students and staff.

OVS and à la Carte Sales

Foods offered in reimbursable meals may also be sold à la carte. Students and cashiers need to be able to distinguish between foods considered food components/food items in a reimbursable meal and à la carte foods.

If a student does not select the required food components/food items in the required quantities, the meal is not reimbursable. Therefore, the school may charge the student à la carte prices for each item selected. As previously discussed, in order to avoid problems at the point of service, schools are expected to conduct

training for cashiers and serving line staff so they can help students select reimbursable lunches and breakfasts.

For more information on requirements for à la carte and other competitive foods sold, please refer to guidance on the Smart Snacks regulation, (http://www.fns.usda.gov/school-meals/smart-snacks-school)

OVS and "Extra" Foods

A school may offer "extra" foods, such as ice cream or pudding, which are not creditable. These foods may complement a reimbursable meal or entice students to purchase a meal. This "extra" food may be selected by the student in addition to the meal, but may not credit toward the minimum number of food components/food items a school is required to offer under OVS. However, these "extra" foods must be included in a nutrient analysis of the weekly menu to assess compliance with the dietary specifications (calories, saturated fat, and sodium). (Also, see the Grains Component section on crediting of grain-based desserts.)

Implementing OVS at Lunch

Overview of Menu Planning/OVS At Lunch

Function	Requirement
Implementation of OVS	Mandatory at the senior high level Optional below senior high school level
Reimbursable Meals Number of Food Components/Food Items Offered	Offer five food components Five food components/number of food items offered varies
Required number of selections for OVS	At all grade levels, student must select at least three components, one of which must be ½ cup of fruits or vegetables
OVS and fruits and vegetables food components/food items	Fruits and vegetables are two separate components. Student must select at least a ½ cup of fruits or vegetables or a combined total of ½ cup of both
Extra foods offered	Not credited for OVS but must be included in dietary specifications

Definitions

A food component is one of five food groups that comprise reimbursable lunches. These are meats/meat alternates; grains; fruits; vegetables; and fluid milk. Schools must always offer all five food components in at least the minimum required quantities.

A food item is a specific food offered within the five food components. For example, a hamburger patty on a bun is one food item with two of the five food components (meats/meat alternates and grains). Separate ½ cup servings of peaches, applesauce and pears are three food items that represent one component (fruits).

Under OVS at lunch, a student must take at least three components in the required quantities. One selection must be at least ½ cup (total) from either the fruits or vegetables component. Depending on the planned menu, the student may need to select more than one food item to have the minimum quantity needed for a component to be credited.

Use of OVS in the NSLP

- OVS must be available for students at senior high schools (as defined by the State educational agency).
- OVS is optional at middle and elementary schools (as defined by the State educational agency).
- OVS is not allowed for the NSLP snack service.
- OVS is optional for summer meals offered through the Seamless Summer Option of the NSLP.

The Basics

The meal pattern for lunches consists of five food components:

(1) Fruits
(2) Vegetables
(3) Grains
(4) Meats/meat alternates (m/ma) and
(5) Fluid milk.

The age/grade groups for lunches are:

- K-5
- 6-8 and
- 9-12.

Under OVS, all students, at any grade level, must select:

- At least 3 of 5 food components **AND**

- For the fruit and vegetable components:
    - One of the choices selected must be at least a ½ cup serving of the fruits or vegetables component or a ½ cup total serving of both fruit and vegetable.

If only three components are selected, and two of these are fruit and vegetable, the student may only select the ½ cup portion for the fruit OR vegetable. For the other two components, the student must select at least the minimum daily required serving* of the components for them to be counted. For example: Student in 5th grade wants to select milk, ½ cup fruit and ½ cup vegetable. In grades k-5 and 6-8 if a student selects the ½ cup fruit, they are selecting the full component of fruit and thus only have to select ½ cup vegetable for OVS; and

- If grains, meats/meat alternates and milk are selected, the student must select at least the daily ½ cup fruit and/or vegetable minimum required amount.

*(for K-5 & 6-8, ¾ cup and for 9-12, 1 cup)

Three food components are required for an adequate nutritious meal for students and to warrant the Federal reimbursement. Within each component, different food items may be offered, giving students many combinations for building a reimbursable meal. Example 1 below shows a typical menu that allows for choices that may be selected by students for a reimbursable lunch for grades 9-12, and K-8.

EXAMPLE 1

Menu for Grades 9-12:

Choose 1: Hamburger on Bun OR Roasted Turkey Sandwich (2 ounce equivalents of grains and 2 ounce equivalents of m/ma each)

Choose up to 2: seasoned corn, green beans, potato wedges (1/2 cup vegetables each)*

Choose up to 2: orange slices, fruit cocktail, banana, apple juice (1/2 cup fruit each)*

Choose 1: nonfat unflavored milk OR nonfat flavored milk (1 cup milk each)

* Two ½ cups of a fruit and ½ cup of a vegetable cannot be credited as two components if the student only selects three components total. Either the fruit or vegetable must be a full cup to count both as components for OVS.

Menu for Grades K-5 and 6-8:

Choose 1: Hamburger on Bun or Roasted Turkey Sandwich (1.5 oz eq meat/meat alternate, 2 oz eq grains)

Choose 1: baked beans, sweet potato wedges, green beans (3/4 cup each)

Choose up to 2: Assorted fruit, fruit cocktail (1/4 cup each (1/2 cup total with two selections))

Choose 1: nonfat flavored milk or low fat unflavored milk (1 cup milk)

In the first lunch menu for grades 9-12, in Example 1, the menu planner offered the daily required minimum amount for the fruit and vegetable components (1 cup total). The student is able to decline some of the offerings as long as at least ½ cup of fruit or vegetable is selected. In this example, the following combinations are reimbursable under OVS:

- the turkey sandwich entrée and ½ cup of orange slices;

- milk, ½ cup of green beans, and the ½ cup banana and ½ cup orange slices (counts as the fruit component since the full 1 cup required daily serving was selected); and
- the hamburger and ½ cup potato wedges.

However, if the student selects the ½ cup corn, ½ cup fruit cocktail, and milk, the meal is not reimbursable because neither the fruit nor vegetable at half cup each, meets the required full component serving size of 1 cup.

In the second lunch menu for K-8, the menu planner offered, in total, the daily required minimum amount for the fruits component (1/2 cup) and the vegetables component (3/4 cup). The student is able to decline some of the offerings as long as at least ½ cup of fruit or vegetable is selected. This means that for this menu, the student must take at least two servings from the fruit or at least one of the vegetable offerings in order to have the minimum daily required serving. In this example, the following combinations are reimbursable under OVS:

- the turkey sandwich, ¼ cup assorted fruit, and ¼ cup fruit cocktail (counts as the full required ½ cup daily serving);
- milk, two 1/4 cup assorted fruits (counts as the full required ½ cup daily serving), ¾ cup sweet potato wedges; and
- hamburger, and ¾ cup potato wedges, (counts as the full required ¾ cup daily serving).

Signage and instructions to students are important to assist them in understanding which foods may be declined under OVS. For examples of signage, check out the school meals Best Practices Sharing Center. (http://healthymeals.nal.usda.gov/best-practices)

Other than selecting the required minimum ½ cup fruit and/or vegetable serving, it is the student's choice to select or decline a food component. Schools may not specify other food components a student must select. However, if the lunch menu includes, for example, a combination food such as a slice of pizza that provides three of the five required food components (grains from the crust; vegetables from the sauce and toppings; and m/ma from the cheese), the student may have to select the slice of pizza if not enough additional options are available to select a reimbursable lunch.

Five food components must be offered in at least the daily minimum required quantities and weekly minimum quantities, if applicable. However, OVS only applies to daily selections, not available choices over the school week.

Food Component Requirements for Lunches

Please note that in the following sections on the individual components (fruits, vegetables, m/ma, and grains), information that applies to each of these components is intentionally repeated.

Meats/Meat Alternates (M/MA) Component

Students in all grades must be offered at least the daily minimum ounce equivalents (oz eq) of m/ma required in the meal pattern. In addition, there is a range over the school week with a minimum number of oz eq that must be offered. This means that on some days, schools serving Grades K-5 and 6-8 must offer more than the minimum daily amount to meet the weekly minimum requirement. The minimum quantity that may be credited towards the m/ma component is 0.25 ounce equivalent.

Grades	Daily Minimum Requirement	Weekly Requirement
K-5	1 ounce equivalent	8-10 ounce equivalents
6-8	1 ounce equivalent	9-10 ounce equivalents
9-12	2 ounce equivalents	10-12 ounce equivalents
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d) (1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g) (2) (vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.		

The m/ma component may be offered in a main dish or in a main dish and one other food item as shown in Example 2 below. All four options offer at least two oz eq of m/ma. However, the beef stew and roast pork options contain all of the m/ma in one food item (main dish), while the other options (peanut butter sandwich plus cheese stick or salad w/chickpeas plus yogurt) split the m/ma component into 2 food items (main dish plus side item).

EXAMPLE 2

M/MA choices at lunch:

- Beef stew (3 oz eq m/ma)
- Roast pork over rice (2 oz eq m/ma)
- Peanut butter sandwich (1.5 oz eq m/ma) and cheese stick (0.75 oz eq m/ma)
- Entree salad w/chickpeas (1 oz eq m/ma) and yogurt (1 oz eq m/ma)

If the m/ma component is offered in two food items, the m/ma component is credited if the student selects the required daily minimum for her/his grade group. This means, again using Example 2, that a student in grades K-5 or 6-8 (with a required daily m/ma minimum of 1 oz eq) could select just the peanut butter sandwich with 1.5 oz eq of m/ma (declining the cheese stick). This selection would credit as meeting the m/ma component. However, since the daily minimum m/ma required for grades 9-12 is 2 oz eq, a 10th grader would have to select *both* the peanut butter sandwich and cheese stick (2.25 oz eq total) to meet the

minimum daily quantity for the m/ma component. Similarly, if only the cheese stick (0.75 oz eq m/ma) was selected by a student at any grade level, it cannot be credited as meeting the m/ma component because it does not meet the daily minimum m/ma required for any age/grade group.

Mature, dry Beans and peas including dry lentils and immature, fresh soy beans may be credited as either m/ma or legume vegetable. Peanuts, which are legumes, cannot count towards the legume vegetable requirement. It is up to the menu planner to determine each day how beans/peas are credited.

Vegetables Component

Students in all grades must be offered daily and weekly minimum servings of vegetables.

Grades	Daily Minimum Requirement	Weekly Minimum Requirement
K-5	¾ cup	3¾ cups
6-8	¾ cup	3¾ cups
9-12	1 cup	5 cups

Full strength juice may be offered to meet up to one-half of the weekly vegetable requirements. Menu planners may allow students to select more than the daily minimum serving of vegetables if the dietary specifications for lunches are not exceeded. The minimum quantity that may be credited towards the vegetables component is one-eighth of a cup.

The vegetables component consists of a variety of subgroups that must be offered over the week. While there is no requirement that a student select each subgroup, the SFA must ensure that all students have the opportunity to select each of the vegetable subgroups over the week.

To be credited as part of a reimbursable lunch for OVS, the minimum quantity of vegetable a student must select is:

- ½ cup of vegetables, or
- ½ cup total from the fruits and vegetables components (credits as one component), or
- ½ cup of an item containing both fruits and vegetables (e.g., a carrot/raisin salad).

A student may take two ¼ cup servings of either the same or a different vegetable to meet the ½ cup minimum requirement for OVS.

EXAMPLE 3

Food items at lunch containing vegetables:

- Beef stew (contains ½ cup vegetables)
- Seasoned corn (½ cup vegetables)
- Carrot/raisin salad (contains ¼ vegetable and ¼ cup fruit)
- Green bean casserole (contains ¼ cup vegetables)
- Green peas (contains ¼ cup vegetables

Example 3 below lists some possible lunch offerings containing vegetables.

In Example 3, the beef stew is a main dish that contains ½ cup of vegetables, while the corn is a side item containing ½ cup of vegetables. The carrot/raisin salad consists of ½ cup combination of both fruits and vegetables in the same dish. Since the green beans and peas are each ¼ cup portions, taking one selection of green beans and one selection of peas meets the ½ cup requirement. Likewise, as noted above, taking two selections of the same vegetable item (such as the green bean casserole) is allowable in order to reach the ½ cup minimum vegetable requirement for OVS.

Beans/peas (legumes) may be credited as either m/ma or vegetable. It is up to the menu planner to determine each day how beans/peas are credited.

If a student does not select at least a ½ cup serving total of fruits and/or vegetables, the lunch is not reimbursable, even if he/she has three other components (e.g., m/ma, grains, and milk). Cashiers should allow these students to select fruits or vegetables from the serving line or have these items available at the point of service. If the student *still* does not select at least a ½ cup serving of fruits and/or vegetables, the meal is not reimbursable. The school may charge the student à la carte prices for the foods selected. Please refer to guidance on the Smart Snacks (http://www.fns.usda.gov/healthierschoolday/tools-schools-smart-snacks).

For OVS purposes, if a student can select more than the minimum daily required serving of vegetables (such as from a salad bar), the component is credited only once. For example, if a 10th grade student makes a salad with three cups of vegetables, s/he must still select at least two other components in order to have a reimbursable meal (one of which could be a ½ cup of fruit).

For OVS, if a 10th grade student selects only three components and two of these are a fruit and a vegetable, s/he must select the full required serving size for either the fruits or vegetables component to have both credited as components. In other words, a 10th grader who selects ½ cup of fruit and ½ cup of vegetables and milk does not have a reimbursable meal. Either the fruit or vegetable selection must be one cup to credit it as a full component. Alternately, the student could select a grain or m/ma choice as the third component, instead of more fruits or vegetables.

EXAMPLE 4

Menu for Grades 9-12:

Choose 1: hamburger on bun OR turkey sandwich (2 oz eq of grains, 2 oz eq of m/ma)

Choose up to 2: seasoned corn, green beans, potato wedges (½ cup of vegetables each)

Choose up to 2: orange slices, fruit cocktail, banana, apple juice (½ cup of fruit each)

Choose 1: nonfat unflavored milk OR nonfat flavored milk (1 cup)

Schools are encouraged to allow students to select more items as long as the weekly dietary specifications are not exceeded.

Using the high school menu in Example 4 above, a reimbursable lunch for OVS that only contains three components and two of these are fruits and vegetables could be:

- ½ cup seasoned corn and ½ cup green beans (1 cup vegetables total; the full vegetables component); ½ cup orange slices (½ cup meets minimum for OVS); 1 cup unflavored milk (milk component)

OR

- ½ cup green beans (½ cup meets minimum for OVS); two ½ cups orange slices (1 cup fruit total; the full fruit component); 1 cup unflavored milk (milk component).

The menu in Example 4 limits the fruit and vegetable choices to two selections for each component. However, schools are encouraged to allow students to take more items if the weekly dietary specifications are met.

Fruits Component

Grades	Daily Minimum Requirement	Weekly Minimum Requirement
K-5	½ cup	2 ½ cups
6-8	½ cup	2 ½ cups
9-12	1 cup	5 cups

Full strength juice may be offered to meet up to one-half of the weekly fruit requirements. Menu planners may allow students to select more than the daily minimum serving for fruit if the dietary specifications for average lunches offered over the school week are met. The minimum quantity that may be credited towards the fruit component is one-eighth of a cup.

To be credited as a reimbursable lunch for OVS, the minimum quantity of fruit that a student must select is:

- ½ cup of fruit, or
- ½ cup total from the fruits and vegetables components (credits as one component), or
- ½ cup of a dish containing both fruit and vegetable (e.g., carrot/raisin slaw).

A student may take two ¼ cup servings of either the same or a different fruit to meet the ½ cup minimum requirement for OVS and be credited as the fruit component.

For OVS purposes, if a student can select more than the minimum daily required quantity of fruit (such as from a salad bar), the component is credited only once. For example, if a 5th grade student selects 2 cups of fruit, s/he must still select at least two other components in order to have a reimbursable meal (one of which could be ½ cup of vegetables).

If a student does not select at least a ½ cup serving total of fruits and/or vegetables, the lunch is not reimbursable, even if they have three other components (e.g., m/ma, grains, and milk). Cashiers should allow these students to select fruits or vegetables from the serving line or have these items available at the point of service. If the student *still* does not select at least a ½ cup serving of fruits and/or vegetables, the meal is not reimbursable. The school may charge the student à la carte prices for the foods selected.

For OVS, if a 10th grade student selects only three components and two of these are a fruit and a vegetable, s/he must select the minimum required daily serving for either the fruits or vegetables components to have both credited as components. In other words, a 10th grader who selects ½ cup of fruit and ½ cup of vegetables and milk does not have a reimbursable meal. Either the fruit or vegetable selection must be one cup to credit it as the third component. Alternately, the student could select a grain or m/ma choice as the third component, instead of more fruits or vegetables.

Grains Component

Grades	**Daily Minimum Requirement**	**Weekly Requirement**
K-5	1 ounce equivalent	8-9 ounce equivalents
6-8	1 ounce equivalent	8-10 ounce equivalents
9-12	2 ounce equivalents	10-12 ounce equivalents
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d) (1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g) (2) (vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums.*		

The grains component is credited for OVS if the total amount selected equals at least the minimum daily ounce equivalent (oz eq) requirement for the grade group. In addition, there is a range over the school week with a minimum number of oz eq that must be offered. This means that on some days, schools must offer more than the minimum daily amount to meet the weekly requirement. The *minimum* quantity that can be credited towards the grains component is one-quarter of an ounce equivalent (0.25 oz eq). The grains component may be offered in combination with another food component (for example, an entrée with grains and m/ma) or separately (such as a roll or serving of rice). All grain offerings over the course of the week must be whole grain-rich. (Temporary exceptions allowed in school year 2015-2016 per memorandum SP 20-2015 dated 2/10/15.)

As shown in Example 5 below, the burrito with chicken and brown rice option contains all of the grains in one food item (entrée), while the spaghetti with marinara sauce (entrée) and roll (side item) option splits the grains component into two food items. The rice pilaf is a grain side item.

EXAMPLE 5

Food item choices containing grains:

- Burrito with chicken and brown rice (2.5 oz eq grains total)
- Spaghetti w/marinara sauce (1.5oz eq grains) and whole wheat roll (0.75 oz eq grain) [2.25 oz eq grains total]
- Rice pilaf (1 oz eq grain)
- Oatmeal raisin cookie (1 oz eq grain)

Again using Example 5, a student in grades K-5 or 6-8 (minimum daily requirement of 1 oz eq) could select just the spaghetti with marinara sauce (declining the dinner roll). The spaghetti would credit as meeting the grains component. However, since the daily minimum grain required for grades 9-12 is 2 oz eq, a 10th grader must select *both* the spaghetti with marinara sauce and the dinner roll (2.25 oz eq total) to meet the grains component. Alternatively, the 10th grader could select both the spaghetti (1.5 oz eq) and the cookie (1 oz eq; a total of 2.5 oz eq) to meet the minimum required 2 oz eq.

Similarly, no student would be able to select just the whole wheat roll (0.75 oz eq), decline the spaghetti with marinara sauce, and meet the grains component. This is because it does not meet the daily minimum grains quantity required for any age/grade group. The student would have to select other food items containing grains to receive credit for the grains component.

Up to 2 oz eq of grain-based desserts may be credited towards the grains component per week. If the student selects a grain-based dessert which meets the daily minimum requirement of 1 oz eq, it is creditable for this component. Therefore, since the oatmeal raisin cookie in Example 5 is 1 oz eq, it could credit as meeting the daily required serving for the grains component for grades K-5 and 6-8 (but not grades 9-12).

Milk Component

For all grade groups, one cup of fluid milk must be offered daily as a beverage. Students may decline milk under OVS. The weekly minimum amount of five cups of milk may be met by offering the daily minimum of one cup. There is also a daily requirement to offer a variety of (at least two) milk choices. For the student to receive credit for the milk component, s/he must select at least one cup of fluid milk.

While water must be made available to students during meal service, SFAs shall not promote or offer water or other beverage **as an alternative selection to fluid milk** on the meal service line. Water is not a food component or food item for the reimbursable meal (see SP 28-2011 "*Revised Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service*" (July 12, 2011) at http://www.fns.usda.gov/water-availability-during-nslp-meal-service

Implementing OVS at Breakfast

Overview of Menu Planning/OVS At Breakfast

Function	Requirement
Implementation of OVS	Optional at all levels
Number of Food Components/Food Items Offered for Reimbursable Meals under OVS	Offer four food items from three components
Required number of selections for OVS	Student must select at least three food items One selection must be at least ½ cup of fruits
OVS and the fruit food component OVS and food items for the fruit component	Vegetables may be offered to meet all or part of the fruit requirement The one cup required quantity may be offered as more than one food item One selection must be at least ½ cup of fruit (or vegetable or a combination of both)
"Extra" foods offered	Not credited for OVS but must be counted in dietary specifications
Double servings of components/food items	Allowed for fruits (or vegetables) and grains (or meats/meat alternates) components.

Definitions

A *food component* is one of three food groups that comprise reimbursable breakfasts. These are: fruits (or vegetables as substitute); grains (with optional meats/meat alternates); and fluid milk. Schools must always offer all three food components in at least the minimum daily required quantities.

A *food item* is a specific food offered within the three food components. For the purposes of OVS, a school must offer at least four food items from the three required food components (fruits, grains, milk). Under OVS, the student must select three food items, including at least ½ cup of fruits or vegetables, to have a reimbursable breakfast.

The food items selected may be from any of the required components and must be in the required minimum quantities (discussed below for each food component). Depending on the planned menu, the student may need to select more than one food item to have the minimum quantity needed for a component to be credited.

OVS in the SBP

OVS is optional at all grade levels.

The Basics

The meal pattern for breakfast consists of three food components:

(1) Fruits (or vegetables substitution)
(2) Grains (or optional credited meats/meat alternates) and
(3) Milk

The age/grade groups for breakfasts are:

- K-5
- 6-8 and
- 9-12.

OVS Menu Planning

For OVS:

- At least four food items must be offered;
- All students, at any grade level, must select at least three food items;
- If selected, the grains (or meats/meat alternates offered for this component) and milk must be in the daily minimum required amount; and
- For the fruit component, the student must select at least ½ cup of fruit or vegetables;

For example, the school may offer 1 oz eq cereal; ½ cup of juice, ½ cup of berries and 8 ounces of milk as the four food items. Under OVS, the student could select cereal, milk, and ½ cup of juice for a reimbursable breakfast.

Except for selecting a ½ cup of fruit, it is the student's choice to select or decline food items. However, the menu planner determines how to offer food items, which may affect the selections a student can make to build a reimbursable breakfast. For example, the menu may offer a combination food that contains more than one food item which cannot be separated, such as a pre-plated waffle with fresh fruit topping. If the student only wanted the waffle, s/he would not be able to decline that fruit, even if s/he did not intend to consume it.

Again, if *choices* of food items within the components are offered, the menu planner must indicate what choices or combination of choices the student may select including any minimum or maximum number that may be taken. For example, if four ½ cup servings are offered for the fruit component, the menu planner must allow the student to select a full cup but must also indicate that at least one ½ cup of fruit is required for a reimbursable meal. If the menu planner chooses, under this example, the student could be allowed to take up to all four choices.

Combination Foods (more than one component)

Example 6 below shows a menu with an option that consists of two food items from different food components. This sample menu could be offered to all grade levels if it meets the calorie ranges for each age/grade group. If the student selects the waffle with fruit -- a combination food with the daily minimum for the grains component (1 oz eq) and the daily minimum for the fruit component for OVS (½ cup) -- and milk, s/he has a reimbursable breakfast. These two selections equal three food items. A student would also have a reimbursable breakfast by selecting one slice of toast, the orange slices and milk. Other possible reimbursable meal combinations include, but are not limited to waffle with fruit and orange slices or 2 slices of toast and oranges.

EXAMPLE 6

Menu offering 5 food items with a choice of a combination food with 2 different components.

Select at least 3 food items:

- Waffle with fruit (1 oz eq grain + ½ cup fruit) [2 food items]

OR

- 2 slices of toast (2 oz eq grains) [2 food items]
- Orange slices (½ cup fruit) [1 food item]
- Apple juice (½ cup fruit) [1 food item]
- Variety of milk (1 cup) [1 food item]

Smoothies with fruit and milk are another popular combination food offered at breakfast. If there is at least 1 cup of milk and at least ½ cup of fruit/juice in the smoothie, the smoothie may count as 2 food items for purposes of OVS. A student would need to select one additional food item in order to have 3 total items and a reimbursable meal. Please refer to the policy memo SP 10-2014, CACFP 5-2014, SFSP

10-2014 (v.3) *Smoothies Offered in Child Nutrition Programs - Revised*; July 23, 2015, for additional information, http://www.fns.usda.gov/sites/default/files/cn/SP10_CACFP05_SFSP10-2014v3os.pdf

Food Component/Food Item Requirements for Breakfast

Grains Component

Grades	Daily Minimum Requirement	Weekly Requirement
K-5	1 ounce equivalent	7-10 ounce equivalent
6-8	1 ounce equivalent	8-10 ounce equivalent
9-12	1 ounce equivalent	9-10 ounce equivalent
Schools are only required to meet the daily and weekly minimum requirements for this food component. This policy is found at 7 CFR 210.7(d) (1) for eligibility to receive additional reimbursement and at 7 CFR 210.18(g)(2)(vi) for the purposes of administrative reviews. State agencies would consider SFAs compliant with the weekly ranges for this component if the FNS-developed or FNS-approved Certification Tool and required supporting documentation indicate the menu is compliant with the daily and weekly *minimums*.		

A grains component selection may be credited as a food item if the total selected equals at least the minimum daily ounce equivalent (oz eq) requirement for the age/grade group. In addition, there is a minimum number of oz eq that must be offered over the course of the week. This means that on some days schools must offer more than the minimum daily amount to meet the minimum weekly requirement. One-quarter of an ounce equivalent (0.25 oz eq) of a grain serving is the smallest amount that may be credited toward the grains component. All grain offerings over the course of the week must be whole grain-rich. (Temporary exceptions allowed in school year 2015-2016 per memorandum SP 20-2015 dated 2/10/15.)

EXAMPLE 7

Menu with four food items:

- Slice of whole grain toast (1 oz eq grain) [1 grain item]
- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- Orange slices (1 cup fruit) [1 fruit item]
- Variety of milk (1 cup) [1 milk item]

Using the menu in Example 7, a reimbursable breakfast could consist of: toast, orange slices, and milk. A student does not have to take both grain food items offered (cereal and toast) since each item is a 1 oz eq and provides the minimum required daily serving. A reimbursable breakfast could also be two slices of toast and the orange slices.

The menu planner may offer the grains component in one or more different food items. If offered in two or more food items, food service staff and students, through training and signage, must know what choices constitute a reimbursable breakfast. In addition, the menu planner determines how many foods must be selected in order to make a reimbursable meal.

A menu planner may offer a 2 oz eq. muffin as one or two food items. For OVS, if the menu planner offers this as one food item, the student must select two additional food items. If the muffin is offered as two food items, as in example 8, the student would only need one additional food item which must be the orange slices. If the student selects the three other food items in example 8, the student can decline the muffin or could select the muffin, orange slices and milk for a total of 4 food items.

EXAMPLE 8

Menu with five food items:

- Whole grain-rich muffin (2 oz eq grain) [2 grain items]
- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- Orange slices (1 cup fruit) [1 fruit item]
- Variety of milk (1 cup) [1 milk item]

Using the menu in Example 8 above, the following selections are reimbursable, but are not inclusive of all options:

- Whole grain-rich muffin, orange slices
- Whole grain-rich muffin, orange slices, milk
- Whole grain-rich cereal, orange slices , milk

Meats/Meat Alternates (M/MA) Offered to Meet the Grains Component

There is no separate requirement to offer the m/ma component in the breakfast meal pattern; however, menu planners have two options for including m/ma in breakfast:

(1) A school may offer m/ma in place of grains *after* the minimum daily grains requirement (1 oz eq for all age/grade groups) is offered. Using the K-5 age group as an example, the weekly grains requirement is 7-10 oz eq, with a minimum of 1 oz eq of grain required per day. This means to meet the weekly requirement of 7-10 oz eq in a five day week there are 2-5 oz eq of grains that could be met by offering meats/meat alternates instead. One oz eq of m/ma may count as one oz eq of grains for purposes of meeting the weekly grains component requirement. The student does not have to select the grains item in order for the m/ma to credit as a grain on the student's tray;

OR

(1) A school may offer m/ma as an "extra" food and not credit it toward any component.

One oz eq of m/ma may count as one oz eq of grains for purposes of meeting the weekly grains component requirement.

Since mature, dry beans and peas including dry lentils and immature, fresh soy beans may credit as m/ma or a legume vegetable, they may also be used in meeting the grains requirement at breakfast, if at least one oz eq of grains is also offered that day as part of a reimbursable breakfast. If credited as a m/ma, mature, dry beans, peas, lentils, and fresh soy beans may not also be credited toward meeting the fruit component (as a vegetable substitute) in the same meal.

Example 9 below shows a menu with the m/ma offered as one of the food items for the grains component. In this example, the student does not have to select both the cereal (grains) and the yogurt (m/ma) for the m/ma to credit. If s/he selects only the yogurt, orange slices, and milk, this is three food items. The cereal is the declined item.

EXAMPLE 9

Menu with four food items:

- Whole grain-rich cereal (1 oz eq grain) [1 grain item]
- low fat yogurt (1/2 cup) (1 oz eq credited as grain) [1 grain item]
- Orange slices (1 cup fruit) [1 fruit item]
- Variety of milk (1 cup) [1 milk item]

Menu planners may allow students to select two of the same grain or m/ma items and count them as two food items. While the menu may indicate each offering as two different food items, if each provides at least one oz eq of grain, the student has two creditable food items under the grains component whether s/he selects the two different food items or two of the same food item. In Example 9, the student could select two servings of cereal and the orange slices under OVS and have three food items.

M/MA as “Extra” Food

Menu planners may also offer m/ma as “extra” food and not credit it toward any of the food components or count it as a food item. If used as an “extra” food, the m/ma does not credit toward the daily or weekly grains component requirement, but must still be counted toward the weekly dietary specifications. Four food items, in addition to an “extra” m/ma food, must be offered for OVS. If the menu planner chooses to offer a m/ma as an “extra” food, staff and students must be aware that this “extra” food is not counted as a food item for OVS purposes and that three other food items must be selected for a reimbursable meal.

As Example 10 below shows, the yogurt as being offered as an “extra” food and may not be credited toward the grains component. Because of this, the offered menu contains only one oz eq of creditable grains (toast). There are only four items for purposes of OVS: toast, oranges, apple juice, and milk, and a

student must take at least one of the fruit items plus two additional items. While relatively uncommon, the menu planner does have the option to designate m/ma as "extra" and not have it credited towards the reimbursable meal as was done in this example for the yogurt. The yogurt, since it is an "extra" food, may not be counted as one of the three food items required for a reimbursable meal.

EXAMPLE 10

Menu with 4 food items with m/ma offered as an extra food:

- Slice of toast (1 oz eq grain) [1 grain item]
- yogurt (½ cup) ("extra" food)
- Orange slices (½ cup fruit) [1 fruit item]
- Apple juice (½ cup fruit) [1 item]
- Variety of milk (1 cup) [1 milk item]

Fruit Component

Grades	Daily Minimum Requirement	Weekly Minimum Requirement
K-5	1 cup	5 cups
6-8	1 cup	5 cups
9-12	1 cup	5 cups

At least one cup of fruit must be offered in reimbursable breakfasts for all age/grade groups. Menu planners may allow students to select more than the daily minimum serving for this component if the weekly dietary specifications, including calories, are not exceeded.

Schools may offer vegetables in place of fruits. The first two cups per week of any such substitution must be from the following subgroups: dark green, red/orange, beans/peas, or "Other vegetables" as discussed in 7 CFR 210.10 (c)(2)(iii) and program guidance. Full strength fruit or vegetable juice may be offered to meet up to one-half of the weekly fruit requirements.

To be credited as part of a reimbursable breakfast for OVS, the minimum quantity a student must select is:

- ½ cup fruits
- ½ cup of vegetables offered in place of fruit
- ½ cup total of a fruit and a vegetable (when offered in place of fruit) and
- ½ cup of an item with both fruit and vegetable (e.g., salsa made with tomatoes and fruit).

The menu planner may offer the fruit component as more than one food item in order to meet the required number of food items needed for OVS. The minimum quantity that may be credited towards this component is 1/8 cup. In Example 11 below, the menu planner offers the fruit component in a variety of different fruits and vegetables, and indicates that at least ½ cup must be selected but does allow students to select all four.

EXAMPLE 11

Menu with seven food items:

- Slice of toast (1 oz eq grain) [1 grain item]
- Whole grain cereal (1 oz eq grain) [1 grain item]
- Choose at least one (and up to all four) of the following items:
  - Tomato juice (½ cup fruit) [1 fruit item]
  - Apple slices (½ cup fruit) [1 fruit item]
  - Pineapple chunks (½ cup fruit) [1 fruit item]
  - Mixed berries (½ cup fruit) [1 fruit item]
- Variety of milk (1 cup) [1 milk item]

In the menu in Example 11 above, there are four fruit items offered since the student may select up to all four and a student could select the tomato juice and any two of the other items. Therefore, a breakfast containing toast, cereal, tomato juice, and apple slices would be reimbursable (*four* items selected). A breakfast containing toast, tomato juice, and apple slices would also be reimbursable (*three* items selected). A breakfast with berries, tomato juice, and apple slices would also be a reimbursable meal (*three* items selected).

EXAMPLE 12

Here is a sample list (NOT a menu) of food items with fruits and/or vegetables that credit toward the fruit component:

- Egg frittata with peppers (1/8 cup vegetable)
- 8 oz 100% orange juice (1 cup fruit)
- Mango/black bean salsa (1/8 cup fruit/vegetable combo)
- Diced pineapple (¼ cup fruit)
- Apple slices (¼ cup fruit)

Example 12 above shows how a menu planner can choose to offer amounts of less than ½ cup of the fruit component across multiple foods. For OVS, the menu planner must indicate what choices the student may select to have at least the required ½ cup of fruit. A student may take the egg frittata (1/8 cup of vegetable), the salsa (1/8 cup of fruit/vegetable) and the pineapple (1/4 cup fruit) for the ½ cup total and this combination is a reimbursable meal. Or s/he could take two servings of salsa (1/4 cup for 2 servings) with the diced pineapple (1/4 cup), for a combined total of ½ cup of fruit. Selection of these items plus

milk and a grain (not shown) would result in a reimbursable breakfast. However, if the student selects only the egg frittata and the apple slices, this only totals 3/8 cup and does not meet the daily OVS minimum of ½ cup. In this case, s/he must also select, for example, the salsa or the orange juice to provide at least the ½ cup of fruit required under OVS.

Milk Component

For all grade groups, one cup of fluid milk must be offered daily. It may be used as a beverage, on cereal, or used in part for each purpose. The weekly minimum amount of five cups of milk may be met by offering the daily minimum of one cup. There is also a daily requirement to offer a variety of (at least two) milk choices. For this component to be credited for OVS, the student must select at least one cup of fluid milk.

While water must be made available to students during meal service, SFAs shall not promote or offer water or other beverages **as an alternative selection to fluid milk** on the meal service line. Water is not a food component or food item for the reimbursable meal (see SP 28-2011 "*Revised Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service*" (July 12, 2011) at http://www.fns.usda.gov/water-availability-during-nslp-meal-service

Questions and Answers

1. How should the serving lines be set-up to assist students with making the correct choices for OVS at lunch?

Although all the foods that are a part of the reimbursable meal do not have to be adjacent to each other, they must be labeled, listed, or otherwise identified near or at the beginning of the serving line so the students can easily choose all the food components/food items for a reimbursable meal. If some of the food components/food items offered in reimbursable meals (such as the fruits and vegetables) is offered beyond the point of service, the school must ensure that students are aware that every reimbursable meal must include at least ½ cup of a fruit and/or vegetables.

2. Must the menu choices be offered at the point of service? For example, SFAs may use caterers or advance on-line ordering to have students place their orders prior to the meal service or make their meal selections on-line.

No; there is no OVS requirement that the student must be able to make her or his OVS selections on a serving line. In these situations, the students are provided choices and thus OVS is followed. These types of systems must be carefully structured and the resulting meals be checked to assure that reimbursable meals are provided. It must be clear to the student and her/his parents/guardians what the choices and requirements are for a reimbursable meal.

3. Since a ½ cup of fruit or vegetable is required under OVS for a reimbursable meal, how can schools handle situations when a student refuses to take a fruit or vegetable at lunch?

Our goal is for schools to provide each student a complete, reimbursable meal daily. To help accomplish this goal, schools are required to identify the content of the daily reimbursable meal(s). If a student refuses to take the required ½ cup fruits/vegetables under OVS, his/her meal is not reimbursable and the school/SFA has discretion in how to handle the situation. The school/SFA must have a policy in place regarding a student's selection of incomplete meals, and notify parents/households about such policy. If the school's policy is not to serve non-reimbursable meals and not to offer other food options, this policy must be communicated to students and parents/guardians in advance. The following are options for the school/SFA:

- Offer the foods for purchase à la carte and any student who has the money either in hand or in his/her account may purchase food à la carte; or
- Allow the student to take the food free of charge and not claim it for reimbursement. In this instance the school foodservice account must cover the cost of the food offered free of charge.

4. What must schools do to comply with the requirement to identify reimbursable meal(s)?

The requirement for SFAs to identify, near or at the beginning of the serving line, the food items that constitute a reimbursable meal is intended to assist students in selecting the required meal components in the appropriate quantities. Regulations, however, do not set specific requirements for signage. State agencies and SFAs may establish requirements to fit their menu, facilities, layout and other considerations. Although all the foods that are a part of the reimbursable meal do not have to be adjacent to each other, they must be labeled, listed, or otherwise identified near or at the beginning of the serving

line so the students can easily choose all the components for a reimbursable meal. If some of the components of the reimbursable meal (such as the fruits and vegetables) are offered beyond the point of service, the school must ensure that students are aware that every reimbursable meal at lunch must include a fruit or a vegetable, and that the total of any fruit or vegetable item selected under OVS must equal at least 1/2 cup.

For examples of innovative and practical signage ideas submitted by SFAs and States, see the *Best Practices Sharing Center* website: http://healthymeals.nal.usda.gov/best-practices.

5. Can pre-bagged meals be offered when breakfast is offered in the classroom and OVS is in place?

Yes. If a school participates in OVS at breakfast and offers breakfasts where some or all of the components are bundled together, the operator should attempt to the extent possible to offer choices (such as a fruit basket) aside from the pre-bagged items. However, there is no requirement that all possible combinations of choices be made available to the student.

6. Does a combination food consisting of 1 oz eq grains and 1 oz eq meats/meat alternates (such as a breakfast sandwich) count as one or two items for purposes of OVS at breakfast?

Menu planners have two options for counting this type of food item:

(1) To count the combination food (e.g., egg sandwich) as two items under the grains component. It provides at least 1 oz eq of grains (the minimum daily requirement for the grains component) plus an additional 1 oz eq of meats/meat alternates which is also counted toward the grains requirement; or

(2) To offer the meats/meat alternates in the combination food as an "extra" and not count it toward the grains component for purposes of OVS. Therefore, this egg sandwich as a whole counts as one grain item. Three additional items --including fruit (or vegetable) and milk -- must be offered for OVS.

7. For a single serving line offering three entrees daily (e.g., hot entrée, cold sandwich, chef salad), must the weekly vegetable subgroups be included in the choices permitted for selection with OVS? For example, baked beans come only with the hot entrée, but students who select the chef salad may only select fruit, not beans. The beans are only offered one day a week.

Yes. Students must be able to select vegetables from each subgroup over the week, regardless of which entrée they choose. If a school elects to limit vegetable choices by entrée, then all the vegetable subgroups must be available with each entrée over the course of the week. By restricting the vegetable subgroup offering by entrée and only offering that subgroup on one day, the school has effectively removed the opportunity for students to select that vegetable subgroup during the week. See SP 54-2014 for guidance on technical assistance, corrective action, and fiscal action. The SA has discretion to reclaim/disallow all deficient meals.

8. Can a student select two ½ cups fruit and milk for a reimbursable breakfast?

Yes, if the menu planners offer each ½ cup of fruit as separate food items. In this example, three food items are selected for a reimbursable breakfast.

9. Can a student select a large piece of fruit (large enough to credit for 1 cup) and milk for a reimbursable breakfast?

Yes, foods that are offered in large enough quantities can credit as two food items. Therefore, an apple that is equivalent to at least one cup can credit as two food items. This practice is at the discretion of the menu planner and must be clearly communicated to staff and students to minimize confusion and ensure students are selecting reimbursable meals. In this example, the apple plus milk would result in three food items selected for a reimbursable meal for OVS.

10. For lunch, may students take a smaller portion of both fruits and vegetables under OVS?

Students must select at least ½ cup of either the fruits or the vegetables component, or a ½ cup combination of both components (¼ cup fruit and ¼ cup vegetable), for a reimbursable meal. If a student selects only three components, and two of these three components are fruits and vegetables, the student may select ½ cup of either the fruit or vegetable, but then must select the minimum daily required serving of the other component.

For example, if a student in grades 9-12 selects milk, fruit and vegetables, the student may take ½ cup of vegetables but must take the full 1 cup offering of the fruit. However, if the student selects another full component, such as a grain or meats/meat alternates, the student may take a smaller portion of the fruit because the fruit is no longer being counted as the 3rd component in the reimbursable meal.

11. Must the SFA prepare full servings of both fruits and vegetables for every student when OVS is in place?

SFAs must plan meals in the NSLP and SBP to meet all meal requirements and provide required amounts of food for all students. Menu planners should take into account participation and selection trends to determine what and how much food to offer students. Careful menu planning will ensure that students have access to all the required food components for the reimbursable meal and minimize food waste.

12. Can a menu planner split the food offered to meet the grains component, or the meats/meat alternates component, into multiple food items and allow students to select only one item under OVS?

Yes, menu planners may split a component into multiple items. Under OVS, the student must take at least the daily minimum required by the meal pattern. For example, a K-5 school offers 2 ounce equivalents of grains: spaghetti (1 oz eq) with a dinner roll (1 oz eq). Since the minimum daily grains requirement for grades K-5 is only 1 oz eq, the student may take either the dinner roll (1 oz eq) or the spaghetti (1 oz eq) and count as meeting the grains component under OVS. This also applies to the meats/meat alternates component. In grades 9-12, since the daily minimum is 2 oz eq, students must select at least 2 oz eq of grains or meats/meat alternates to count toward these components. Students are instructed on how much of each component must be selected through meal identification signage.

Wellness Policy Cover

South Dakota Model Wellness Policy

Can be found here: http://doe.sd.gov/cans/documents/17-SDWell.docx

Wellness Policy Self-Checklist

Can be found here: http://doe.sd.gov/cans/documents/17-LWPchk.docx

Wellness Policy Final Rule Summary

Can be found here: http://doe.sd.gov/cans/documents/SumWellnP.pdf

Wellness Policy Guidance and Q&A

Can be found here: http://doe.sd.gov/cans/documents/17-LocalWellness.pdf

South Dakota Model Wellness Policy

Can be found here: http://doe.sd.gov/cans/documents/17-SDWell.docx

SOUTH DAKOTA MODEL WELLNESS POLICY
BASED ON THE
ALLIANCE FOR A HEALTHIER GENERATION MODEL WELLNESS POLICY
Updated 4/2017

[*School District*] Wellness Policy

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SOUTH DAKOTA MODEL WELLNESS POLICY
BASED ON THE
ALLIANCE FOR A HEALTHIER GENERATION MODEL WELLNESS POLICY
Updated 4/2017

[School District] Wellness Policy

Note: A local school wellness policy is a written document that guides a local education agency (LEA) in establishing a healthy school environment. Each LEA participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) is required to establish a written local school wellness policy for all schools under its jurisdiction (7 CFR 210.31 c)).This "Basic" district-level wellness policy template meets the minimum Federal standards for local school wellness policy implementation under the final rule of the Healthy, Hunger-Free Kids Act of 2010, the Alliance for a Healthier Generation Healthy Schools Program Bronze-level award criteria, and minimum best practice standards accepted in the education and public health fields. School districts should choose policy language that meets their current needs and also supports growth over time]. If you are using this tool to compare your policy against, you should include the language in italics as the strongest examples for comparison.

Please note: South Dakota Model Wellness Policy is based on the Alliance for a Healthier Generation Model Wellness Policy. Visit healthiergeneration.org to observe the Alliance for a Healthier Generation Model Policy.

Preamble

[Insert School District name] (hereto referred to as the District) is committed to the optimal development of every student. The District believes that for students to have the opportunity to achieve personal, academic, developmental and social success, we need to create positive, safe and health-promoting learning environments at every level, in every setting, throughout the school year.

Research shows that two components, good nutrition and physical activity before, during and after the school day, are strongly correlated with positive student outcomes. For example, student participation in the U.S. Department of Agriculture's (USDA) School Breakfast Program is associated with higher grades and standardized test scores, lower absenteeism and better performance on cognitive tasks.[1,2,3,4,5,6,7] Conversely, less-than-adequate consumption of specific foods including fruits, vegetables and dairy products, is associated with lower grades among students.[8,9,10] In addition, students who are physically active through active transport to and from school, recess, physical activity breaks, high-quality physical education and extracurricular activities – do better academically.[11,12,13,14]. Finally, there is evidence that adequate hydration is associated with better cognitive performance. [15,16,17]

This policy outlines the District's approach to ensuring environments and opportunities for all students to practice healthy eating and physical activity behaviors throughout the school day while minimizing commercial distractions. Specifically, this policy establishes goals and procedures to ensure that:

- Students in the District have access to healthy foods throughout the school day – both through reimbursable school meals and other foods available throughout the school campus– in accordance with Federal and state nutrition standards;
- Students receive quality nutrition education that helps them develop lifelong healthy eating behaviors;

- Students have opportunities to be physically active before, during and after school;
- Schools engage in nutrition and physical activity promotion and other activities that promote student wellness;
- School staff are encouraged and supported to practice healthy nutrition and physical activity behaviors in and out of school;
- The community is engaged in supporting the work of the District in creating continuity between school and other settings for students and staff to practice lifelong healthy habits; and
- The District establishes and maintains an infrastructure for management, oversight, implementation, communication about and monitoring of the policy and its established goals and objectives.

This policy applies to all students, staff and schools in the District. Specific measureable goals and outcomes are identified within each section below.

[Recommended Optional language includes:

- The District will coordinate the wellness policy with other aspects of school management, including the District's School Improvement Plan, when appropriate.
- NOTE: Will also include any relevant data or statistics from state or local sources supporting the need for establishing and achieving the goals in this policy.]

I. School Wellness Committee

Committee Role and Membership

The District will convene a representative district wellness committee (hereto referred to as the local wellness committee or work within an existing school health committee) periodically to establish goals for and oversee school health and safety policies and programs, including development, implementation and periodic review and update of this district-level wellness policy (heretofore referred as "wellness policy").

The local wellness committee membership will represent all school levels (elementary and secondary schools) and include (to the extent possible), but not be limited to: parents and caregivers; students; representatives of the school nutrition program (e.g., school nutrition director); physical education teachers; health education teachers; school health professionals (e.g., health education teachers, school health services staff [e.g., nurses, physicians, dentists, health educators, and other allied health personnel who provide school health services], school administrators (e.g.., superintendent, principal, vice principal), school board members; health professionals (e.g., dietitians, doctors, nurses, dentists); and the general public.

Leadership

The Superintendent or designee(s) will convene the local wellness committee and facilitate development of and updates to the wellness policy, and will ensure each school's compliance with the policy.

The designated official for oversight is (Title of official; contact information recommended)

The name(s), title(s), and contact information (email address is sufficient) of this/these individual(s) is(are): (Wellness Policy Committee)

Name	Title / Relationship to the School or District	Email address	Role on Committee
Ima Example	Community Member	ImaExample@community.org	Assists in the evaluation of the wellness policy implementation

Each school will designate a school wellness policy coordinator, who will ensure compliance with the policy. Refer to Appendix A for a list of school-level wellness policy coordinators.

II. Wellness Policy Implementation, Monitoring, Accountability and Community Engagement

Implementation Plan

The District will develop and maintain a plan for implementation to manage and coordinate the execution of this wellness policy. The plan delineates roles, responsibilities, actions and timelines specific to each school; and includes information about responsibilities, specific goals, and objectives for nutrition standards for all foods and beverages available on the school campus, food and beverage marketing, nutrition promotion and education, physical activity, physical education and other school-based activities that promote student wellness. It is recommended that the school use the Healthy Schools Program online tools to complete a school-level assessment based on the Centers for Disease Control and Prevention's School Health Index, create an action plan that fosters implementation and generate an annual progress report.

This wellness policy and the progress reports/policy updates can be found at: INSERT URL for DISTRICT's WEBSITE.

Recordkeeping

The District will retain records to document compliance with the requirements of the wellness policy at [District's Administrative Offices, Room #] and/or on [District's central computer network] for three years past the current year. Documentation maintained in this location will include but will not be limited to:

- The written wellness policy;
- Documentation demonstrating that the policy has been made available to the public;
- Documentation of efforts to review and update the Local Schools Wellness Policy; including an indication of who is involved in the update and methods the district uses to make stakeholders aware annually of their ability to participate on the local wellness committee;
- Documentation to demonstrate compliance with the annual public notification requirements;
- The most recent assessment on the implementation of the local school wellness policy;
- Documentation demonstrating the most recent assessment on the implementation of the Local School Wellness Policy has been made available to the public.

Annual Notification of Policy

The District will actively inform families and the public each year of basic information about this policy, including its content, any updates to the policy and implementation status. The District will make this information available via the district website and/or district-wide communications. The District will provide as much information as possible about the school nutrition environment. This will include a summary of the District's (or schools') events or activities related to wellness policy implementation. Annually, the District will also publicize the name and contact information of the District/school officials leading and coordinating the committee, as well as information on how the public can get involved with the school wellness committee.

Triennial Progress Assessments

At least once every three years, the District will evaluate compliance with the wellness policy to assess the implementation of the policy for all sites under district jurisdiction and include:

- The extent to which schools under the jurisdiction of the District are in compliance with the local wellness policy;
- The extent to which the District's wellness policy compares to a model policy (like the Alliance for a Healthier Generation's model wellness policy or the State Model Wellness Policy); and
- A description of the progress made in attaining the goals of the District's wellness policy.
    - Assessment will identify how the policy will be updated to add areas as needed, improve progress toward goals, etc.
    - Documentation of when and how the policy was evaluated will be maintained.

The position/person responsible for managing the triennial assessment and contact information is _____ (list the person responsible here, their title, and their contact information) _____.

The local wellness committee, in collaboration with individual schools, will monitor schools' compliance with this wellness policy.

The District [or school] will actively notify households/families of the availability of the triennial progress report.

Revisions and Updating the Policy

The local wellness committee will update or modify the wellness policy based on the results of the annual School Health Index and triennial assessments and/or as District priorities change; community needs change; wellness goals are met; new health science, information, and technology emerges; and new Federal or state guidance or standards are issued. The wellness policy will be assessed and updated as indicated at least every three years, following the triennial assessment. Documentation of update will be maintained, such as attendance sheet, meeting minutes, etc.

Community Involvement, Outreach and Communications

The District is committed to being responsive to community input, which begins with awareness of the wellness policy. The District will actively communicate ways in which representatives of local wellness committee and others can participate in the development, implementation and periodic review and update of the wellness policy through a variety of means appropriate for that district. The District will also inform parents of the improvements that have been made to school meals and compliance with school meal standards, availability of child nutrition programs and how to apply, and a description of and compliance with Smart Snacks in School nutrition standards. The District will use electronic mechanisms, such as email or displaying notices on the district's website, as well as non-electronic mechanisms, such as newsletters, presentations to parents, or sending information home to parents, to ensure that all families are actively notified of the content of, implementation of, and updates to the wellness policy, as well as how to get involved and support the policy. The District will ensure that communications are culturally and linguistically appropriate to the community, and accomplished through means similar to other ways that the district and individual schools are communicating important school information with parents.

The District will actively notify the public about the content of or any updates to the wellness policy annually, at a minimum. The District will also use these mechanisms to inform the community about the availability of the annual and triennial reports.

III. Nutrition

School Meals

Our school district is committed to serving healthy meals to children, with plenty of fruits, vegetables, whole grains, and fat-free and low-fat milk; that are moderate in sodium, low in saturated fat, and have zero grams trans fat per serving (nutrition label or manufacturer's

specification); and to meeting the nutrition needs of school children within their calorie requirements. The school meal programs aim to improve the diet and health of school children, help mitigate childhood obesity, model healthy eating to support the development of lifelong healthy eating patterns and support healthy choices while accommodating cultural food preferences and special dietary needs.

All schools within the District participate in USDA child nutrition programs, including the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and [include here any additional Federal child nutrition programs in which the district participates, possibly including the Fresh Fruit & Vegetable Program (FFVP), Special Milk Program (SMP), Summer Food Service Program (SFSP), Supper programs, or others]. The District also operates additional nutrition-related programs and activities including [if applicable, insert here a list of other programs such as Farm to School programs, school gardens, Breakfast in the Classroom, Mobile Breakfast carts, Grab 'n' Go Breakfast, or others]. All schools within the District are committed to offering school meals through the NSLP and SBP programs, and other applicable Federal child nutrition programs, that:

- Are accessible to all students;
- Are appealing and attractive to children;
- Are served in clean and pleasant settings;
- Meet or exceed current nutrition requirements established by local, state, and Federal statutes and regulations. (The District offers reimbursable school meals that meet USDA nutrition standards.)
- Promote healthy food and beverage choices, such as one or more of the following:
  - Whole fruit options are displayed in attractive bowls or baskets (instead of chaffing dishes or hotel pans).
  - Sliced or cut fruit is available daily.
  - Daily fruit options are displayed in a location in the line of sight and reach of students.
  - All available vegetable options have been given creative or descriptive names.
  - Daily vegetable options are bundled into all grab-and-go meals available to students.
  - All staff members, especially those serving, have been trained to politely prompt students to select and consume the daily vegetable options with their meal.
  - White milk is placed in front of other beverages in all coolers.
  - Alternative entrée options (e.g., salad bar, yogurt parfaits, etc.) are highlighted on posters or signs within all service and dining areas.
  - A reimbursable meal can be created in any service area available to students (e.g., salad bars, snack rooms, etc.).
  - Student surveys and taste testing opportunities are used to inform menu development, dining space decor and promotional ideas.
  - Student artwork is displayed in the service and/or dining areas.
  - Daily announcements are used to promote and market menu options.

Staff Qualifications and Professional Development

All school nutrition program directors, managers and staff will meet or exceed hiring and annual continuing education/training requirements in the USDA professional standards for child nutrition professionals. These school nutrition personnel will refer to USDA's Professional Standards for School Nutrition Standards website to search for training that meets their learning needs.

Water

To promote hydration, free, safe, unflavored drinking water will be available to all students throughout the school day* and throughout every school campus* ("school campus" and "school day" are defined in the glossary). The District will make drinking water available where school meals are served during mealtimes.

Competitive Foods and Beverages

The District is committed to ensuring that all foods and beverages available to students on the school campus* during the school day* support healthy eating. The foods and beverages sold and served outside of the school meal programs (e.g., "competitive" foods and beverages) will meet the USDA Smart Snacks in School nutrition standards, at a minimum. Smart Snacks aim to improve student health and well-being, increase consumption of healthful foods during the school day and create an environment that reinforces the development of healthy eating habits. A summary of the standards and information, as well as a Guide to Smart Snacks in Schools are available at: http://www.fns.usda.gov/healthierschoolday/tools-schools-smart-snacks. The Alliance for a Healthier Generation provides a set of tools to assist with implementation of Smart Snacks available at www.foodplanner.healthiergeneration.org.

To support healthy food choices and improve student health and well-being, all foods and beverages outside the reimbursable school meal programs that are sold to students on the school campus during the school day* [and ideally, the extended school day*] will meet or exceed the USDA Smart Snacks nutrition standards [or, if the state policy is stronger, "will meet or exceed state nutrition standards"]. These standards will apply in all locations and through all services where foods and beverages are sold, which may include, but are not limited to, à la carte options in cafeterias, vending machines, school stores and snack or food carts.

Celebrations and Rewards (Optional)

All foods offered on the school campus will meet or exceed the USDA Smart Snacks in School nutrition standards including through:

1. Celebrations and parties. The district will provide a list of healthy party ideas to parents and teachers, including non-food celebration ideas. Healthy party ideas are available from the Alliance for a Healthier Generation and from the USDA.
2. Classroom snacks brought by parents. The District will provide to parents a list of foods and beverages that meet Smart Snacks nutrition standards.
3. Rewards and incentives. The District will provide teachers and other relevant school staff a list of alternative ways to reward children. Foods and beverages will not be used as a reward, or withheld as punishment for any reason, such as for performance or behavior.
   [Meets Healthy Schools Program Silver-level criteria]

Fundraising

Foods and beverages that meet or exceed the USDA Smart Snacks in Schools nutrition standards may be sold through fundraisers on the school campus* during the school day*. The District will make available to parents and teachers a list of healthy fundraising ideas [examples from the Alliance for a Healthier Generation and the USDA].

Optional: [Given the pervasiveness of food fundraisers in many schools and the wide availability of profitable, healthy fundraising options, additional policy language is encouraged:

- Schools will use only non-food fundraisers, and encourage those promoting physical activity (such as walk-a-thons, Jump Rope for Heart, fun runs, etc.).
- Fundraising during and outside school hours will sell only non-food items or foods and beverages that meet or exceed the Smart Snacks nutrition standards. These fundraisers may include but are not limited to, donation nights at restaurants, cookie dough, candy and pizza sales, market days, etc. (Meets Healthy Schools Program Gold-level criteria)]

Nutrition Promotion

Nutrition promotion and education positively influence lifelong eating behaviors by using evidence-based techniques and nutrition messages, and by creating food environments that encourage healthy nutrition choices and encourage participation in school meal programs. Students and staff will receive consistent nutrition messages throughout schools, classrooms, gymnasiums, and cafeterias. Nutrition promotion also includes marketing and advertising nutritious foods and beverages to students and is most effective when implemented consistently through a comprehensive and multi-channel approach by school staff, teachers, parents, students and the community.

The District will promote healthy food and beverage choices for all students throughout the school campus, as well as encourage participation in school meal programs. This promotion will occur through at least:

- Review and consider evidence-based healthy food promotion techniques through the school meal programs using Smarter Lunchroom techniques; and
- Ensuring 100% of foods and beverages promoted to students meet the USDA Smart Snacks in School nutrition standards. Additional promotion techniques that the District and individual schools may use are available at http://www.foodplanner.healthiergeneration.org/.

Nutrition Education

The District will teach, model, encourage and support healthy eating by all students. Schools will provide nutrition education and engage in nutrition promotion that:

- Is designed to provide students with the knowledge and skills necessary to promote and protect their health;
- Is part of not only health education classes, but also integrated into other classroom instruction through subjects such as math, science, language arts, social sciences and elective subjects;

- Includes enjoyable, developmentally-appropriate, culturally-relevant and participatory activities, such as cooking demonstrations or lessons, promotions, taste-testing, farm visits and school gardens;
- Promotes fruits, vegetables, whole-grain products, low-fat and fat-free dairy products and healthy food preparation methods;
- Emphasizes caloric balance between food intake and energy expenditure (promotes physical activity/exercise);
- Links with school meal programs, cafeteria nutrition promotion activities, school gardens, Farm to School programs, other school foods and nutrition-related community services;
- Teaches media literacy with an emphasis on food and beverage marketing; and
- Includes nutrition education training for teachers and other staff.

[Provide specifics on how Nutrition Education will be achieved.]

[Optional additional policy language includes:

- In elementary schools, nutrition education will be offered at each grade level as part of a sequential, comprehensive, standards-based health education curriculum that meets state and national standards (meets Healthy Schools Program Silver/Gold-level criteria).
- All health education teachers will provide opportunities for students to practice or rehearse the skills taught through the health education curricula (meets Healthy Schools Program Silver/Gold-level criteria).]

Essential Healthy Eating Topics in Health Education – Suggested

The District will include a health education curriculum; examples of topics below:

- Relationship between healthy eating and personal health and disease prevention
- Food guidance from MyPlate
- Reading and using FDA's nutrition fact labels
- Eating a variety of foods every day
- Balancing food intake and physical activity
- Eating more fruits, vegetables and whole grain products
- Choosing foods that are low in fat, saturated fat, and cholesterol and do not contain trans fat
- Choosing foods and beverages with little added sugars
- Eating more calcium-rich foods
- Preparing healthy meals and snacks
- Risks of unhealthy weight control practices
- Accepting body size differences
- Food safety
- Importance of water consumption
- Importance of eating breakfast
- Making healthy choices when eating at restaurants
- Eating disorders
- The Dietary Guidelines for Americans
- Reducing sodium intake
- Social influences on healthy eating, including media, family, peers and culture
- How to find valid information or services related to nutrition and dietary behavior
- How to develop a plan and track progress toward achieving a personal goal to eat healthfully
- Resisting peer pressure related to unhealthy dietary behavior

- Influencing, supporting, or advocating for others' healthy dietary behavior

Food and Beverage Marketing in Schools

The District is committed to providing a school environment that ensures opportunities for all students to practice healthy eating and physical activity behaviors throughout the school day while minimizing commercial distractions. The District strives to teach students how to make informed choices about nutrition, health and physical activity. These efforts will be weakened if students are subjected to advertising on District property that contains messages inconsistent with the health information the District is imparting through nutrition education and health promotion efforts. It is the intent of the District to protect and promote student's health by permitting advertising and marketing for only those foods and beverages that are permitted to be sold on the school campus, consistent with the District's wellness policy.

Any foods and beverages marketed or promoted to students on the school campus* during the school day* will meet or exceed the USDA Smart Snacks in School nutrition standards such that only those foods that comply with or exceed those nutrition standards are permitted to be marketed or promoted to students.

Food and beverage marketing is defined as advertising and other promotions in schools. Food and beverage marketing often includes an oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product made by the producer, manufacturer, seller or any other entity with a commercial interest in the product.[15] This term includes, but is not limited to the following:

- Brand names, trademarks, logos or tags, except when placed on a physically present food or beverage product or its container.
- Displays, such as on vending machine exteriors
- Corporate brand, logo, name or trademark on school equipment, such as marquees, message boards, scoreboards or backboards (Note: immediate replacement of these items are not required; however, districts will replace or update scoreboards or other durable equipment when existing contracts are up for renewal or to the extent that is in financially possible over time so that items are in compliance with the marketing policy.)
- Corporate brand, logo, name or trademark on cups used for beverage dispensing, menu boards, coolers, trash cans and other food service equipment; as well as on posters, book covers, pupil assignment books or school supplies displayed, distributed, offered or sold by the District.
- Advertisements in school publications or school mailings.
- Free product samples, taste tests or coupons of a product, or free samples displaying advertising of a product.

As the District/school nutrition services/Athletics Department/PTA/PTO reviews existing contracts and considers new contracts, equipment and product purchasing (and replacement) decisions should reflect the applicable marketing guidelines established by the District wellness policy.

IV. Physical Activity

Children and adolescents should participate in at least 60 minutes of physical activity every day. A substantial percentage of students' physical activity can be provided through a comprehensive school physical activity program (CSPAP). A CSPAP reflects strong coordination and synergy across all of the components: quality physical education as the foundation; physical activity before, during and after school; staff involvement and family and community engagement and the district is committed to providing these opportunities. Schools will ensure that these varied physical activity opportunities are in addition to, and not as a substitute for, physical education (addressed in "Physical Education" subsection). All schools in the district will be encouraged to participate in Let's Move! Active Schools (www.letsmoveschools.org) in order to successfully address all CSPAP areas.

Physical activity during the school day (including but not limited to recess, classroom physical activity breaks or physical education) will not be withheld as punishment for any reason [insert if appropriate: "This does not include participation on sports teams that have specific academic requirements]. The district will provide teachers and other school staff with a list of ideas for alternative ways to discipline students.

To the extent practicable, the District will ensure that its grounds and facilities are safe and that equipment is available to students to be active. The District will conduct necessary inspections and repairs.

Physical Education

The District will provide students with physical education, using an age-appropriate, sequential physical education curriculum consistent with national and state standards for physical education. The physical education curriculum will promote the benefits of a physically active lifestyle and will help students develop skills to engage in lifelong healthy habits, as well as incorporate essential health education concepts (discussed in the "Essential Physical Activity Topics in Health Education" subsection). The curriculum will support the essential components of physical education.

All students will be provided equal opportunity to participate in physical education classes. The District will make appropriate accommodations to allow for equitable participation for all students and will adapt physical education classes and equipment as necessary.

All District elementary students in each grade will receive physical education for at least [X] minutes per week throughout the school year. [NOTE: Local wellness policy requirements do not identify a specific amount and frequency requirements for physical education (PE); however PE goals must be included in the policy.]

All [District] secondary students (middle and high school) are required to take the equivalent of one academic year of physical education, and meeting minimum state PE/Health Education requirements. [NOTE: Local wellness policy requirements do not identify a specific amount and frequency requirements for physical education (PE); however PE goals must be included in the policy.]

Examples of Physical Activity Topics in Health Education

- The physical, psychological, or social benefits of physical activity
- How physical activity can contribute to a healthy weight
- How physical activity can contribute to the academic learning process
- How an inactive lifestyle contributes to chronic disease
- Health-related fitness, that is, cardiovascular endurance, muscular endurance, muscular strength, flexibility, and body composition
- Differences between physical activity, exercise and fitness
- Phases of an exercise session, that is, warm up, workout and cool down
- Overcoming barriers to physical activity
- Decreasing sedentary activities, such as TV watching
- Opportunities for physical activity in the community
- Preventing injury during physical activity
- Weather-related safety, for example, avoiding heat stroke, hypothermia and sunburn while being physically active
- How much physical activity is enough, that is, determining frequency, intensity, time and type of physical activity
- Developing an individualized physical activity and fitness plan
- Monitoring progress toward reaching goals in an individualized physical activity plan
- Dangers of using performance-enhancing drugs, such as steroids
- Social influences on physical activity, including media, family, peers and culture
- How to find valid information or services related to physical activity and fitness
- How to influence, support, or advocate for others to engage in physical activity
- How to resist peer pressure that discourages physical activity.

Recess (Elementary) – Optional

All elementary schools will offer at least [X] minutes of recess on all days during the school year (Insert as appropriate any language such as: This policy may be waived on early dismissal or late arrival days). If recess is offered before lunch, schools will have appropriate hand-washing facilities and/or hand-sanitizing mechanisms located just inside/outside the cafeteria to ensure proper hygiene prior to eating and students are required to use these mechanisms before eating. Hand-washing time, as well as time to put away coats/hats/gloves, will be built in to the recess transition period/timeframe before students enter the cafeteria.

Outdoor recess will be offered when weather is feasible for outdoor play. [Depending on regions or weather conditions, districts may insert weather guidelines or guidelines for outside play here. OR District could create new ones such as: "Students will be allowed outside for recess except when outdoor temperature is above/below District-set temperature, inclusive of wind chill factors, during "code orange" or "code red" days, during storms with lightening or thunder, or at the discretion of the building administrator based on his/her best judgment of safety conditions."]

In the event that the school or district must conduct indoor recess, teachers and staff will follow the indoor recess guidelines that promote physical activity for students, to the extent practicable. [District can insert indoor recess guidelines here, which might delineate a minimum amount of time for activity opportunities during indoor recess. If these guidelines do not yet exist, the district wellness council will create them or facilitate their development on a school-by-school basis and include them here.] [If District opts for school-by-school indoor recess guidelines, insert: Each school will maintain and enforce its own indoor recess guidelines.]

Recess will complement, not substitute, physical education class. Recess monitors or teachers will encourage students to be active, and will serve as role models by being physically active alongside the students whenever feasible.

Classroom Physical Activity Breaks (Elementary and Secondary) – Optional

The District recognizes that students are more attentive and ready to learn if provided with periodic breaks when they can be physically active or stretch. Thus, students will be offered periodic opportunities to be active or to stretch throughout the day on all or most days during a typical school week. The District recommends teachers provide short (3-5-minute) physical activity breaks to students during and between classroom time at least three days per week. These physical activity breaks will complement, not substitute, for physical education class, recess, and class transition periods.

The District will provide resources and links to resources, tools, and technology with ideas for classroom physical activity breaks. Resources and ideas are available through USDA and the Alliance for a Healthier Generation.

Active Academics – Optional

Teachers will incorporate movement and kinesthetic learning approaches into "core" subject instruction when possible (e.g., science, math, language arts, social studies and others) and do their part to limit sedentary behavior during the school day.

The District will support classroom teachers incorporating physical activity and employing kinesthetic learning approaches into core subjects by providing annual professional development opportunities and resources, including information on leading activities, activity options, as well as making available background material on the connections between learning and movement.

Teachers will serve as role models by being physically active alongside the students whenever feasible.

Before and After School Activities – Optional

The District offers opportunities for students to participate in physical activity either before and/or after the school day (or both) through a variety of methods. The District will encourage students to be physically active before and after school by: [District should choose appropriate and reasonable options such as physical activity clubs, physical activity in aftercare, intramurals or interscholastic sports, and insert approaches here.]

Active Transport – Optional

The District will support active transport to and from school, such as walking or biking. The District will encourage this behavior by engaging in six or more of the activities below; including but not limited to: [District will select from the list below and insert them here as policy].

- Designate safe or preferred routes to school
- Promote activities such as participation in International Walk to School Week, National Walk and Bike to School Week
- Secure storage facilities for bicycles and helmets (e.g., shed, cage, fenced area)
- Instruction on walking/bicycling safety provided to students
- Promote safe routes program to students, staff, and parents via newsletters, websites, local newspaper
- Use crossing guards
- Use crosswalks on streets leading to schools
- Use walking school buses
- Document the number of children walking and or biking to and from school
- Create and distribute maps of school environment (e.g., sidewalks, crosswalks, roads, pathways, bike racks, etc.)

V. Other Activities that Promote Student Wellness

The District will integrate wellness activities across the entire school setting, not just in the cafeteria, other food and beverage venues and physical activity facilities. The District will coordinate and integrate other initiatives related to physical activity, physical education, nutrition and other wellness components so all efforts are complementary, not duplicative, and work towards the same set of goals and objectives promoting student well-being, optimal development and strong educational outcomes.

Schools in the District are encouraged to [Optional language: Schools in the District will…] coordinate content across curricular areas that promote student health, such as teaching nutrition concepts in mathematics, with consultation provided by either the school or the District's curriculum experts.

All efforts related to obtaining federal, state or association recognition for efforts, or grants/funding opportunities for healthy school environments will be coordinated with and complementary of the wellness policy, including but not limited to ensuring the involvement of the local wellness committee.

All school-sponsored events will adhere to the wellness policy guidelines. All school-sponsored wellness events will include physical activity and healthy eating opportunities when appropriate.

Community Partnerships – Optional

The District will [insert as appropriate to current efforts: develop, enhance, or continue] relationships with community partners (e.g., hospitals, universities/colleges, local businesses, SNAP-Ed providers and coordinators, etc.) in support of this wellness policy's implementation.

Existing and new community partnerships and sponsorships will be evaluated to ensure that they are consistent with the wellness policy and its goals.

Community Health Promotion and Family Engagement – Optional

The District will promote to parents/caregivers, families, and the general community the benefits of and approaches for healthy eating and physical activity throughout the school year. Families will be informed and invited to participate in school-sponsored activities and will receive information about health promotion efforts.

As described in the "Community Involvement, Outreach, and Communications" subsection, the District will use electronic mechanisms (e.g., email or displaying notices on the district's website), as well as non-electronic mechanisms, (e.g., newsletters, presentations to parents or sending information home to parents), to ensure that all families are actively notified of opportunities to participate in school-sponsored activities and receive information about health promotion efforts.

Staff Wellness and Health Promotion – Optional

The local wellness committee will focus on staff wellness issues, identifies and disseminates wellness resources and performs other functions that support staff wellness in coordination with human resources staff. The subcommittee leader's name is_____(list here).

Schools in the District will implement strategies to support staff in actively promoting and modeling healthy eating and physical activity behaviors. Examples of strategies schools will use, as well as specific actions staff members can take, include_____(list 3-4 strategies here). The District promotes staff member participation in health promotion programs and will support programs for staff members on healthy eating/weight management that are accessible and free or low-cost.

[Optional language includes:

- The District will use a healthy meeting policy for all events with available food options, created by the local wellness committee or one that currently exists that optimizes healthy food options with a variety of choices and selections of healthy foods for a variety of dietary needs.]

Professional Learning – Optional

When feasible, the District will offer annual professional learning opportunities and resources for staff to increase knowledge and skills about promoting healthy behaviors in the classroom and school (e.g., increasing the use of kinesthetic teaching approaches or incorporating nutrition lessons into math class). Professional learning will help District staff understand the connections between academics and health and the ways in which health and wellness are integrated into ongoing district reform or academic improvement plans/efforts.

Glossary:

Extended School Day – the time during, before and afterschool that includes activities such as clubs, intramural sports, band and choir practice, drama rehearsals and more.

School Campus - areas that are owned or leased by the school and used at any time for school-related activities, including on the outside of the school building, school buses or other vehicles used to transport students, athletic fields and stadiums (e.g., on scoreboards, coolers, cups, and water bottles), or parking lots.

School Day – the time between midnight the night before to 30 minutes after the end of the instructional day.

Triennial – recurring every three years.

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Wellness Policy Self-Checklist

Can be found here: http://doe.sd.gov/cans/documents/17-LWPchk.docx

Does Your Wellness Policy Measure Up?

A local school wellness policy is a written document that guides a local educational agency (LEA) or school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn. Use this checklist to review and update your wellness policy and ensure it meets all requirements as written in *SEC. 204 of Public Law 111-296 Local School Wellness Policy Implementation* and the Code of Federal Regulation 210.30 and 220.7.

☐ District has current wellness policy. Date it was last updated: _____

- Includes goals for nutrition education & promotion, physical activity, and other school-based activities.
  - Consider evidence-based "Smarter Lunchrooms" strategies and techniques
- Includes Smart Snacks in School nutrition standards for all foods and beverages sold at each school during the school day (before school and 30 minutes after school).
- Includes nutrition standards for foods and beverages, not sold to students, but available throughout the school day (e.g. classroom parties, foods given as reward, classroom snacks, etc.).
- Includes policies that allow marketing or advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
- Includes a plan for measuring implementation of the policy

☐ Wellness Policy Leadership: District has designated at least one school official who has the authority and responsibility to ensure each school complies with the policy. Name/Title of Designated Official: _____

☐ District permits involvement of the following people in the development, implementation, review, and modification of the wellness policy:

☐ Parents	☐ Students	☐ School Food Service
☐ Teachers of Physical Education	☐ School Health Professionals	☐ School Board Members
☐ School Administrators	☐ General Public	

Documentation: current committee member list, meetings announcements, committee invitations, updates and assessments made available to the public

Does Your Wellness Policy Measure Up?

A local school wellness policy is a written document that guides a local educational agency (LEA) or school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn. Use this checklist to review and update your wellness policy and ensure it meets all requirements as written in SEC. 204 of Public Law 111-296 Local School Wellness Policy Implementation and the Code of Federal Regulation 210.30 and 220.7.

☐ District has current wellness policy. Date it was last updated: _____

- Includes goals for nutrition education & promotion, physical activity, and other school-based activities.
  - Consider evidence-based "Smarter Lunchrooms" strategies and techniques
- Includes Smart Snacks in School nutrition standards for all foods and beverages sold at each school during the school day (before school and 30 minutes after school).
- Includes nutrition standards for foods and beverages, not sold to students, but available throughout the school day (e.g. classroom parties, foods given as reward, classroom snacks, etc.).
- Includes policies that allow marketing or advertising of only those foods and beverages that meet Smart Snacks in School nutrition standards.
- Includes a plan for measuring implementation of the policy

☐ Wellness Policy Leadership: District has designated at least one school official who has the authority and responsibility to ensure each school complies with the policy. Name/Title of Designated Official:

_____

☐ District permits involvement of the following people in the development, implementation, review, and modification of the wellness policy:

☐ Parents	☐ Students	☐ School Food Service
☐ Teachers of Physical Education	☐ School Health Professionals	☐ School Board Members
☐ School Administrators	☐ General Public	

Documentation: current committee member list, meetings announcements, committee invitations, updates and assessments made available to the public

☐ District informs and updates the public on the content and implementation of the wellness policy including progress made in attaining the goals of the policy.

- Triennial Building Progress Reports: description of each school's progress in meeting the wellness policy goals, a summary of each school's local wellness events, and activities, and information on how individuals can get involved completed every 3 years.
- Triennial Assessments: assess compliance of the local school wellness policy by compiling School Wellness Building Progress Reports every 3 years to determine progress made in attaining the policy goals.
  - Assessment report must describe the extent to which its schools comply with the local wellness policy, the extent to which the local policy aligns with model policies, and a description of progress towards attaining policy goals.

Documentation: web address, newsletter article, copy of e-mail, completed assessment tools, etc.

SD Dept. of Education's Child and Adult Nutrition Services reviews school wellness policies during Administrative Reviews.

You can find more information on School Wellness Policies here: http://doe.sd.gov/cans/nslp.aspx

Does Your Wellness Policy Measure Up?

Local Wellness Policy Final Regulation from 7 CFR 210.31 and 220.7

(a) General. Each local educational agency must establish a local school wellness policy for all schools participating in the National School Lunch Program and/or School Breakfast Program under the jurisdiction of the local educational agency. The local school wellness policy is a written plan that includes methods to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meals and other food and beverages sold and otherwise made available on the school campus during the school day are consistent with applicable minimum Federal standards.

(b) Definitions. (see 7 CFR 210.31 and 220.7 for list of definitions)

(c) Content of the plan. At a minimum, local school wellness policies must contain:

1) Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. In developing these goals, local educational agencies must review and consider evidence-based strategies and techniques;

(2) Standards for all foods and beverages provided, but not sold, to students during the school day on each participating school campus under the jurisdiction of the local educational agency;

(3) Standards and nutrition guidelines for all foods and beverages sold to students during the school day on each participating school campus under the jurisdiction of the local educational agency that;

(i) Are consistent with applicable requirements set forth under §§ 210.10 and 220.8 of this chapter;

(ii) Are consistent with the nutrition standards set forth under § 210.11;

(iii) Permit marketing on the school campus during the school day of only those foods and beverages that meet the nutrition standards under § 210.11; and

(iv) Promote student health and reduce childhood obesity.

(4) Identification of the position of the LEA or school official(s) or school official(s) responsible for the implementation and oversight of the local school wellness policy to ensure each school's compliance with the policy;

(5) A description of the manner in which parents, students, representatives of the school food authority, teachers of physical education, school health professionals, the school board, school administrators, and the general public are provided an opportunity to participate in the development, implementation, and periodic review and update of the local school wellness policy; and

(6) A description of the plan for measuring the implementation of the local school wellness policy, and for reporting local school wellness policy content and implementation issues to the public, as required in paragraphs (d) and (e) of this section.

(d) Public involvement and public notification. Each local educational agency must:

(1) 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 periodic review and update of the local school wellness policy;

(2) Inform the public about the content and implementation of the local school wellness policy, and make the policy and any updates to the policy available to the public on an annual basis;

(3) Inform the public about progress toward meeting the goals of the local school wellness policy and compliance with the local school wellness policy by making the triennial assessment, as required in paragraph (e)(2) of this section, available to the public in an accessible and easily understood manner.

(e) Implementation assessments and updates. Each local educational agency must:

(1) Designate one or more local educational agency officials or school officials to ensure that each participating school complies with the local school wellness policy;

(2) At least once every three years, assess schools' compliance with the local school wellness policy, and make assessment results available to the public. The assessment must measure the implementation of the local school wellness policy, and include:

(i) The extent to which schools under the jurisdiction of the local educational agency are in compliance with the local school wellness policy;

(ii) The extent to which the local educational agency's local school wellness policy compares to model local school wellness policies; and

(iii) A description of the progress made in attaining the goals of the local school wellness policy.

(3) Make appropriate updates or modifications to the local school wellness policy, based on the triennial assessment.

(f) Recordkeeping requirement. Each local educational agency must retain records to document compliance with the requirements of this section. These records include but are not limited to:

(1) The written local school wellness policy;

(2) Documentation demonstrating compliance with community involvement requirements, including requirements to make the local school wellness policy and triennial assessments available to the public as required in paragraph (e) of this section; and

(3) Documentation of the triennial assessment of the local school wellness policy for each school under its jurisdiction.

Wellness Policy Final Rule Summary

Can be found here: http://doe.sd.gov/cans/documents/SumWellnP.pdf

USDA United States Department of Agriculture

Local School Wellness Policy Implementation Under the Healthy, Hunger-Free Kids Act of 2010: Summary of the Final Rule

What is a local school wellness policy?

A local school wellness policy ("wellness policy") is a written document that guides a local educational agency's (LEA) or school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn.

The wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). It requires each LEA participating in the National School Lunch Program and/or School Breakfast Program to develop a wellness policy. The final rule expands the requirements to strengthen policies and increase transparency. The responsibility for developing, implementing, and evaluating a wellness policy is placed at the local level, so the unique needs of each school under the LEA's jurisdiction can be addressed.

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Provisions of the Final Rule

On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. The final rule requires LEAs to begin developing a revised local school wellness policy during School Year 2016-2017. LEAs must fully comply with the requirements of the final rule by June 30, 2017.

Content of the Wellness Policy

At a minimum, policies are required to include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for:
  - School meal nutrition standards, and the
  - Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

Wellness Leadership

LEAs must establish wellness policy leadership of one or more LEA and/or school official(s) who have the authority and responsibility to ensure each school complies with the policy.

Public Involvement

At a minimum, LEAs must:

- Permit participation by the general public and the school community (including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators) in the wellness policy process.

Triennial Assessments

The final rule requires State agencies to assess compliance with the wellness policy requirements as a part of the general areas of the administrative review every 3 years.

LEAs must conduct an assessment of the wellness policy every 3 years, at a minimum. This assessment will determine:

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

Documentation

The State agency will examine records during the Administrative Review, including:

- Copy of the current wellness policy,
- Documentation on how the policy and assessments are made available to the public,
- The most recent assessment of implementation of the policy, and
- Documentation of efforts to review and update the policy, including who was involved in the process and how stakeholders were made aware of their ability to participate.

Updates to the Wellness Policy

The final rule requires that LEAs update or modify the wellness policy as appropriate.

Public Updates

The rule requires that LEAs must make available to the public:

- The wellness policy, including any updates to and about the wellness policy, on an annual basis, at a minimum, and
- The Triennial Assessment, including progress toward meeting the goals of the policy.

Regulation

The proposed rule was published in the Federal Register, and the 60-day public comment period closed on April 28, 2014. FNS received 57,838 public comments that were considered in developing the final rule.

The final rule was published on July 29, 2016 and can be found online at: **http://www.fns.usda.gov/tn/local-school-wellness-policy**.

Resources

USDA Food and Nutrition Service's "School Nutrition Environment and Wellness Resources" Web site has information and resources on:

- Local school wellness policy process,
- Wellness policy elements,
- Success stories,
- Grants/funding opportunities, and
- Trainings.

Check it out! **http://healthymeals.nal.usda.gov/school-wellness-resources**

Model Wellness Policy – Thoroughly reviewed by USDA FNS, the Alliance for a Healthier Generation's model policy template is in compliance with the requirements set forth in the proposed rule and will be updated per the final rule.

Putting Local School Wellness Policies Into Action: Stories From School Districts and Schools – The Centers for Disease Control and Prevention and USDA developed a compilation of 11 stories to help LEAs and schools implement wellness policies.

National Wellness Study Briefs – Bridging the Gap's research briefs highlight areas of opportunity for State agencies, LEAs, and schools to strengthen wellness policy components.

Wellness Policy Guidance and Q&A

Can be found here: http://doe.sd.gov/cans/documents/17-LocalWellness.pdf

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: April 6, 2017

MEMO CODE: SP 24-2017

SUBJECT: Local School Wellness Policy: Guidance and Q&As

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Local educational agencies (LEA) participating in the National School Lunch Program and/or School Breakfast Program are required to develop a local school wellness policy that promotes the health of students and addresses the problem of childhood obesity. Wellness policies are tailored to the unique needs of each LEA and present an opportunity to improve the health of each community.

On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. The final rule requires LEAs to begin developing a revised local school wellness policy during school year 2016-2017. The revised policy must be in place by June 30, 2017.

The final regulation offers LEAs flexibility in determining how best to implement policies that reflect their unique circumstances. This memorandum provides Questions and Answers (Q&As) to address the local school wellness policy final rule.

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The final regulation offers LEAs flexibility in determining how best to implement policies that reflect their unique circumstances. This memorandum provides Questions and Answers (Q&As) to address the local school wellness policy final rule.

The local school wellness policy resource center available at https://healthymeals.fns.usda.gov/school-wellness-resources provides extensive resources school officials at the local, State, and Federal level may use to better understand the local school wellness policy requirements and their positive benefits.

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State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at https://www.fns.usda.gov/school-meals/school-meals-contacts. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

Angela Kline
Director
Policy and Program Development Division
Child Nutrition Programs

Attachment

Attachment

General

1. What is a local school wellness policy and is it required?

A local school wellness policy is a written document that guides a local educational agency (LEA) in establishing a healthy school environment. Each LEA participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) is required to establish a written local school wellness policy for all schools under its jurisdiction (7 CFR 210.31(c)). LEAs have the flexibility to customize their individual local school wellness policy based on their own specific circumstances to best improve the health of their students.

2. What is required to be included in local school wellness policies?

While LEAs have flexibility to develop the specific content of their local school wellness policies, the policies must include the following:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that are designed to promote student wellness (7 CFR 210.31(c)(1));
- Standards and nutrition guidelines for all foods and beverages available on the school campus during the school day that are, at a minimum, consistent with Federal regulations for program meals and the Smart Snacks in School nutrition standards, and designed to promote student health and reduce childhood obesity (7 CFR 210.31(c)(2) and (3)); and
- Policies that allow marketing or advertising of only those foods and beverages that may be sold on the school campus during the school day, i.e., those foods and beverages that meet the Smart Snacks in School nutrition standards (available at http://www.fns.usda.gov/school-meals/fr-072916d) (7 CFR 210.31(c)(3)(iii)).

LEAs are also required to:

- Review and consider evidence-based strategies in determining local school wellness goals (7 CFR 210.31(c)(1));
- Involve, inform, and update the public (including parents, students, and other stakeholders) about the content and implementation of the local school wellness policy (7 CFR 210.31(d)(2) and (3));
- Conduct an assessment, at least once every three years, to determine compliance, progress, and the extent to which the policy compares to model local school wellness policies (7 CFR 210.31(e)(2)); and
- Update or modify the local school wellness policy as appropriate (7 CFR 210.31(e)(3)).

3. Who is responsible for developing the local school wellness policy?

The LEA is responsible for developing a local school wellness policy (7 CFR 210.31(a)). This responsibility is placed at the local level so that LEAs have flexibility to address the unique needs of each school under their jurisdiction. In an effort to foster transparency and inclusion, LEAs are required to allow parents, students, SFA representatives, teachers of physical education, school health professionals, the school board, school administrators, and members of the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy (7 CFR 210.31(c)(5)). While the LEA is ultimately responsible for developing the local school wellness policy, a best practice would include having each school, within the LEA, customize the policy at the local level.

4. Do local school wellness policy standards apply to all foods and beverages on the school campus during the school day?

Local school wellness policies are required to address foods and beverages that are both sold and made available at no cost to students.

LEAs must develop standards and nutrition guidelines for all foods and beverages available, but not sold to students on the school campus during the school day (for example classroom parties or rewards). While, these standards and nutrition guidelines are not required to be consistent with Smart Snacks standards as stated in 7 CFR 210.31(c)(3)(iii), local jurisdictions have the discretion to adopt standards that are consistent with Federal school meals and Smart Snacks nutrition standards or to adopt more or less stringent standards.

For foods and beverages sold to students, the local school wellness policy must include standards and nutrition guidelines that are consistent with the school meal requirements and Smart Snacks nutrition standards.

5. Can nonprofit school food service account funds be used to implement local school wellness policies?

Yes, generally, nonprofit school food service account funds may be used to implement local school wellness policies, if the local school wellness policy is supporting the operation or improvement of the school meal program.

In order to use this funding for local school wellness policy related activities, the SFAs' food service program must be providing meals in compliance with National School Lunch Program and School Breakfast Program meal patterns and in compliance with resource management. In cases where only a portion of the local school wellness policy coordinator's time is spent directly supporting the school food service operation, the nonprofit school food service account may only cover the portion of the coordinator's salary that is deemed necessary, reasonable, and allocable for the operation of the school meal programs. The LEA may determine that funding a staff position or activities related to the local school wellness policy will support the operation and improvement of the Program, and that the associated

costs are necessary, reasonable, and allocable in accordance with the cost principles of 2 CFR 200. Continual assessment of these costs is essential to ensure that the nonprofit school food service account can continue to support these activities over time.

Programs Included

6. Are small schools and Residential Child Care Institutions (RCCIs) expected to have a wellness policy?

All schools that participate in the school meal programs are expected to have a wellness policy, including small schools and RCCIs. While there are no exclusions in the law based on the size of a school or institution that participates in the meal programs, these institutions are encouraged to develop a wellness policy that meets the unique needs of their population. Because of the responsibility that RCCIs have in providing nutrition and physical activity to children in residence, it is important that RCCIs implement wellness policies that will support the health and development of their residents.

7. Is a wellness policy required if the school only operates the Special Milk Program?

A school or other program that operates only the Special Milk Program is not required to have a local school wellness policy.

8. Does the wellness policy requirement apply to private schools, including religious private schools, and charter schools?

Each LEA must establish a local school wellness policy for all schools participating in the NSLP and/or SBP under its jurisdiction (7 CFR 210.31(a)). This includes any private schools, religious private schools, and charter schools that participate in the school meals programs.

Any schools, including private and non-public charter schools, that do not participate in the school meals programs, may develop their own wellness policy, or the governing board could develop one for all affiliated schools. Such schools are not required to follow the local school district's local school wellness policy.

Food and Beverage Marketing

9. What are the requirements around food and beverage marketing?

LEAs are permitted to market foods and beverages that may be sold on the school campus during the school day, i.e., those foods and beverages that meet the requirements set forth in the Smart Snacks standards (7 CFR 210.31(c)(3)(iii)). Marketing of non-compliant food and beverages is not permitted during the school day, but may be present at events that happen after the end of the school day. For example, an evening sporting event may sell and market non-compliant foods or beverages. More information on the Smart Snacks nutrition standards

is available at http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks.

10. How does the term "marketing" apply in local school wellness policies?

Food marketing commonly includes oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product. Therefore, the marketing standards apply to items such as posters, flyers, and other printed materials advertising products. It also applies to prizes or other premium items given to students to promote a product, cups used for beverage dispensing, and various equipment, such as the exterior of vending machines, menu boards, coolers, trash cans, and other food service equipment. All food or beverage products depicted on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards.

11. What types of marketing are exempt from local school wellness policies?

The marketing restrictions do not apply to materials used for educational purposes in the classroom, such as teachers' use of advertisements as an education tool; or when implementing a health or nutrition education curriculum that favors the consumption of some foods over others.

Items exempt from the marketing provision also include items of personal expression such as clothing, and the packaging of products brought from home for personal consumption. For example, if a child wears a shirt that has a food item pictured, the food is not required to meet the Smart Snacks standards in order for the child to wear the item of clothing. Similarly, if a child brings a package of crackers from home, the food item is not required to meet the Smart Snacks standards.

12. What areas of the school are affected by the food and beverage marketing policies?

Marketing standards apply to the school campus. The school campus is defined as all areas of the property under the jurisdiction of the school that are accessible to students during the school day (7 CFR 210.11(a)(4)). School day is defined as the midnight before through 30 minutes after the end of the school day (7 CFR 210.11(a)(5)). Examples of areas affected include the cafeteria, classrooms, hallways, gymnasiums, football/soccer fields, running track, parking lots, and all other areas of the campus that students may occupy during the school day.

13. Do the food and beverage marketing policies apply to equipment such as scoreboards?

Items, such as scoreboards, that are already in place do not need to be replaced; however, LEAs must consider the marketing guidelines in the wellness policy when these items are replaced or updated over time. In addition to scoreboards, marketing policies apply to other such durable items or equipment that is on school campus property and accessible by students during the school day (7 CFR 210.11(a)(4)). These items may include signs

inside/outside of the school, water coolers, beverage cases, food display racks, and school buses.

14. Do the food and beverage marketing policies apply to after school sporting or other events?

The local school wellness policy marketing requirements do not apply to events occurring more than 30 minutes after the school day, such as after school sporting or other events. However, it is important to remember that Federal Smart Snacks standards are minimum standards and the LEA has discretion to adopt more stringent standards and extend the marketing policy to events outside of school hours.

15. My school/State has its own standards for snack foods sold in schools and/or food and beverage marketing policies. How are they affected by the local school wellness policy?

The Federal Smart Snacks standards and marketing policies are minimum requirements for schools that participate in USDA's school meals programs. States, districts, and schools that have stronger standards and policies may maintain their own policies, as long as they do not conflict with USDA standards. LEAs have flexibility on how to implement this requirement. It is not intended to imply that schools must allow food or beverage marketing on campus.

16. If a vending machine is turned off during the school day, is the outside of it (logos, pictures, etc.) still considered marketing?

Yes. The front and sides of a vending machine provide a graphic statement intended for the purpose of promoting the sale of a food or beverage product, regardless of whether the machine is on or off.

17. Is there a restriction against marketing brand names?

No, brand name marketing is not restricted. If a specific product does not meet the Smart Snacks nutrition standards, it may not be marketed on the school campus during the school day, however, the brand may be marketed. The final rule also discusses copycat products, where a company reformulates one product in a brand's product line to meet school nutrition standards. Marketing of copycat products is not restricted under the regulations.

LEAs have discretion to determine what is in the best interest of their respective school communities, however, and may implement additional marketing restrictions. LEAs may choose to include more stringent marketing standard for brand marketing and copycat products in their local school wellness policy; they may simply eliminate advertising of all brands that market foods inconsistent with the Smart Snacks nutrition standards; or they may allow both brand marketing and copycat products that meet Smart Snacks standards to be marketed in schools.

18. Do the local school wellness policy standards permit the marketing of incentive programs like a restaurant or brand that gives free pizza or coupons when students read a certain number of books?

Yes. The local school wellness policy marketing standards are not intended to restrict incentive programs. While the LEA is required to address standards and nutrition guidelines for all foods and beverages available on the school campus during the school day, it may determine what is in the best interest of their respective school communities. LEAs are encouraged to use nonfood-related incentive programs or programs that promote items consistent with the Smart Snacks standards.

19. Are label redemption programs (e.g., Box Tops for Education) allowed under this final rule?

Yes. This rule is not intended to restrict label redemption programs. Promotion of label redemption programs on school property is permitted.

Triennial Assessment

20. How often must LEAs conduct assessments of schools' compliance with the local school wellness policy?

At a minimum, assessments must be conducted once every three years as described in 7 CFR 210.31(e); this is referred to as the triennial assessment. This assessment is separate from the Administrative Review conducted by the State agency. The local school wellness policy must be updated and in compliance with the final rule by June 30, 2017. Therefore, the first triennial assessment must be completed by June 30, 2020.

21. Who is responsible for conducting the assessments?

LEAs must designate at least one LEA or school official(s) as responsible for determining the extent to which each school under their jurisdiction is in compliance with their wellness policies (7 CFR 210.31(e)(1)).

In addition to the official(s) identified, other stakeholders must be permitted to be involved in the review process as described in 7 CFR 210.31(d)(1). However, LEAs have discretion in how they implement this requirement since each LEA is best suited to determine the distinctive needs of the community it serves. LEAs are also encouraged to identify a wellness champion at each school that would assist with the implementation and monitoring of the policy at the school level.

22. What must be included in the triennial assessment?

The LEA must develop a triennial assessment report that describes the extent to which its schools comply with the local school wellness policy, the extent to which the local policy aligns with model policies, and a description of progress towards attaining policy goals as

described in 7 CFR 210.31(e)(2). There is local discretion on the format of the report. This report must be made available to the public (7 CFR 210.31(d)(3)).

23. What tools should LEAs use to assess implementation and compliance with the local school wellness policy?

The LEA has the flexibility to develop tools that will assess compliance with the specific components of their local school wellness policy. Some State agencies and partner organizations have developed tools that LEAs can adapt to meet their needs. Example tools can be found at the "School Nutrition Environment and Wellness Resources" website at https://healthymeals.fns.usda.gov/local-wellness-policy-resources/local-school-wellness-policy-process/assessment-needs-assessment. In addition, the LEA must document when and how they evaluated their policy. For example, an agenda or attendance sheet could be used as documentation that the local school wellness policy was evaluated at a stakeholder meeting.

24. How often does the LEA have to update the policy?

USDA does not specify the frequency of updates to the local school wellness policy, as the need to update will vary based on the content and structure of the policy. However, it is recommended that the policy is updated, at a minimum, after conducting the triennial assessments (7 CFR 210.31(e)(3)). LEAs are also required to annually notify the public about the content of the local school wellness policy and any updates to the policy as stated in 7 CFR 210.31(d)(2).

25. How should LEAs compare their policies to model policies?

The responsibility for developing a local school wellness policy was placed at the LEA level so that each LEA has the flexibility to customize their own policy based on their own unique circumstances. However, at a minimum, LEAs must compare their policy against model policies during the triennial assessment (7 CFR 210.31(e)(2)(ii)). The Alliance for a Healthier Generation, in conjunction with USDA, developed a model local school wellness policy template that may be used for this comparison: https://www.healthiergeneration.org/_asset/wtqdwu/14-6372_ModelWellnessPolicy.doc.

26. Does the LEA need to do a triennial assessment of all the schools under its jurisdiction, or does each school do its own triennial assessment and report back to the LEA?

The LEA is responsible for ensuring that a triennial assessment of all the schools under its jurisdiction has been conducted. The LEA may conduct the triennial assessment on behalf of each participating school under its jurisdiction, or may allow each school to conduct its own assessment.

27. What are the next steps if an LEA is not in compliance with the local school wellness policy requirements?

The final rule required LEAs to begin developing a revised local school wellness policy by August 29, 2016. These revised policies must be in place by July 1, 2017. While LEAs are updating and implementing new wellness policies, State agencies should focus on providing technical assistance and work with the LEA on a corrective action plan in order to achieve compliance.

Technical assistance resources include USDA's Food and Nutrition Service (FNS) Team Nutrition website. The "School Nutrition Environment and Wellness Resources" web pages provide information and guidance resources, including:

- **Local School Wellness Policy Process** steps to put the policy into action, as well as sample policy language and examples of existing State-level health policies;
- **Required Wellness Policy Elements** to meet the federal requirements;
- **Success Stories and Best Practice** ideas for schools;
- **Grants/Funding Opportunities** related to child nutrition and physical activity; and
- **Trainings** that will assist districts/schools in developing, implementing, and monitoring their wellness policies.

This website also includes information on the requirements and a summary of the final rule. The resources website can be accessed at https://healthymeals.fns.usda.gov/school-wellness-resources.

28. What documentation is needed for the Administrative Review?

During an Administrative Review, the State agency will review the written local school wellness policy and will ensure a LEA or school official(s) has been designated to oversee the policy process. The State agency will also review documentation demonstrating:

- Compliance with community involvement requirements, such as a copy of the solicitation on the LEA/school website or school newsletter and a list of the stakeholders involved (attendance sheet, or list of titles such as parent, school nurse, etc.);
- That the local school wellness policy content and annual updates, as well as the triennial assessments, were made available to the public, such as a copy of the LEA/school webpage and/or the school newsletter or local newspaper where the local school wellness policy and assessment results have been posted;
- How the policy compares to model policies; and
- That a triennial assessment of the local school wellness policy was conducted for each school under its jurisdiction.

Public Notification

29. How should LEAs notify the public that they have a policy and/or there has been an update to the policy?

LEAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). LEAs may best determine the optimal time for providing the information, although FNS recommends that the information be provided early in the school year. Best practices include highlighting the policy on individual school websites, linking to the policy on individual school social media accounts, sending updates in a parent or school newsletter, including the policy in a presentation during parent/staff meetings, providing copies of the policy at back-to-school nights, featuring the policy on the parent- or staff-specific webpages, and posting on school bulletin boards. Other strategies include placing a blurb in a local community newsletter or newspaper, posting on a community website or blog, or sharing updates and accomplishments on a local radio or television show. Team Nutrition's new *Local School Wellness Policy Outreach Toolkit* provides free templates to help notify the public and can be adapted to meet the LEA's needs. This toolkit can be accessed at http://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit.

30. How often are LEAs or schools required to notify the public about the local school wellness policy?

LEAs are required to annually notify the public of the local school wellness policy and any updates to the policy (7 CFR 210.31(d)). FNS also encourages LEAs or schools to include a summary of each school's events or activities related to local school wellness policy implementation on their annual public notification. LEAs may determine the optimal time for providing the information, although FNS recommends that the information be provided early the school year.

31. Are LEAs or schools required to produce annual progress reports?

On an annual basis, LEAs are required to notify the public of the local school wellness policy and any updates to the policy (7 CFR 210.31(d)). FNS also encourages LEAs or schools to include a summary of each school's events or activities related to local school wellness policy implementation on their annual public notification.

32. Does the LEA or school official(s) designated to oversee the wellness policy need to publicize their contact information?

LEAs are only required to identify the position title of the LEA or school official(s) responsible for oversight of the local school wellness policy. However, LEAs are strongly encouraged to provide a means of contacting the LEA or school official(s) responsible for oversight by designating an LEA or school-based phone number and/or email address for the community to provide suggestions, make inquiries, request to get involved, or contribute to wellness policy implementation.

33. How should LEAs engage stakeholders in the policy?

Each year, stakeholders must be provided with the opportunity to participate in the development, implementation, periodic review, and update of the local school wellness policy as stated in 7 CFR 210.31(d)(1). It is at the discretion of the LEA on how stakeholders are invited to participate. Suggestions for including a variety of stakeholders include:

- sending a letter to parents/families;
- providing status updates in teacher/staff trainings;
- posting a call for volunteers on the LEA website;
- including a blurb on the school, LEA, or local community newspaper, newsletter, and/or blog;
- partnering with community organizations to spread the information; and
- posting information about the process on social media.

Team Nutrition has developed an outreach toolkit to help LEAs engage parents and school staff in the development, implementation, and monitoring of their wellness policy. The customizable templates are available for download at http://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit. Examples of other ways to engage parents are provided in the Center for Disease Control and Prevention's (CDC) Parents for Healthy Schools found at http://www.cdc.gov/healthyschools/parentengagement/parentsforhealthyschools.htm.

34. How should Residential Child Care Institutions (RCCIs) comply with the required public notification?

Although RCCIs may have different circumstances than LEAs, the intent of the public notification requirement is to inform the public about the process and how they can get involved. RCCIs are required to inform parents/caregivers and any other members of the public about the local wellness policy. The RCCI has discretion to determine to whom this public notification should be directed. Notification may be as simple as including the local school wellness policy and a description of how to get involved on the RCCI website, newsletter, RCCI social media, or other means of notifying families and the general public.

Please note that RCCIs are not required to inform the public regarding eligibility criteria for school meals if they do not have day students. However, they are still required to notify the public of the local school wellness policy provisions because the intent is to provide information to the public about the policy and invite members of the public to become involved.

Goals

35. Does the wellness policy have to include a specific number of hours for nutrition or physical education?

Nutrition and physical education are very important aspects of wellness and complement a healthy school environment. LEAs have discretion in determining the best way to structure their school day, and there is no requirement that an LEA include specific amount and frequency requirements (i.e., days per week, and minutes per day/week) in their policy goals, objectives, and annual benchmarks for physical education, nutrition education, and physical activity. However, FNS encourages LEAs to require a specific number of hours and/or frequency to assist in assessing whether schools are meeting their goals and to consider the Centers for Disease Control and Prevention's (CDC) recommendation of 60 minutes of physical activity each day for children and adolescents (see https://www.cdc.gov/physicalactivity/basics/children/index.htm).

36. What are some examples of evidence-based strategies/techniques to establish wellness goals?

The following examples of evidence-based strategies have been shown to improve the likelihood that children will make the healthier choice: using creative names for fruits and vegetables and targeted entrées, training staff to prompt students to select fruits and vegetables, placing unflavored milk in front of other beverage choices, and bundling ''grab and go'' meals that include fruit and vegetable items.

LEAs should review ''Smarter Lunchroom'' tools and strategies, which are evidence-based, simple, low-cost or no-cost changes that are shown to improve student participation in the school meals program while encouraging consumption of more whole grains, fruits, vegetables, and legumes, and decreasing plate waste (for more information, please visit, https://healthymeals.fns.usda.gov/healthierus-school-challenge-resources/smarter-lunchrooms).

37. How can farm to school strategies be included in wellness policies?

Wellness policies offer an opportunity to showcase farm to school efforts and gain buy in from the community. According to the Farm to School Census, over two thirds of school districts engaged in farm to school activities said they enjoy positive impacts, including increased support from parents and community members, improved acceptance of and participation in school meals, lower school meal program costs, and less plate waste.

Wellness policies offer an opportunity to engage community stakeholders that can help districts start and/or expand activities such as buying local foods, growing gardens, and offering nutrition, agriculture and culinary education. For specific ideas and sample language from other districts that have included farm to school efforts in their policies, please visit https://healthymeals.fns.usda.gov/farm-school-wellness-policy-language.

Wellness Leadership and Involvement

38. Who should oversee the wellness policy?

The LEA has discretion in determining who is responsible for overseeing the wellness policy, including assessments. The LEA is most qualified to identify the best candidate(s) for local school wellness policy leadership as size, resources, and needs vary greatly among LEAs and schools. Some LEAs have a position titled "Wellness Coordinator," while in other LEAs, the School Nutrition Director or Lead Health Education Coordinator oversees the policy. The regulations do not specify the title or position of the designated wellness official(s), but simply require that the responsible official(s) be designated (7 CFR 210.31(e)(1)).

Regardless of who is named as the designated official(s) to oversee the wellness policy process, the CDC's case study examination found that in successful schools, a "wellness champion" serves as the driving force for developing and implementing the wellness policy. A single wellness champion – such as a school nurse, district superintendent, or community member – led the process in many schools and districts. The champion played a critical role in starting the process and keeping it going when challenges arose. For more information, see https://www.cdc.gov/healthyyouth/npao/pdf/251553_SchoolWellnessInAction_Final_508_Ready_508tagged.pdf.

39. How does FNS define "actively" seeking members for the wellness committee? Is sending an e-mail enough?

LEAs have discretion in how they implement the requirement to actively seek members for their wellness committee. Sending an email is one example of how an LEA could meet the requirement. Other examples include a posting in a newsletter or on the LEA's website or social media page, or creating an advertisement in a local community newsletter or newspaper.

Technical Support

40. Where can I get more information and technical support?

USDA Food and Nutrition Service (FNS) has developed wellness web-resources, as a part of the Team Nutrition website. The wellness policy website has information on the requirements and a summary of the final rule, action steps for local educational agencies and schools, tools and resources, monitoring wellness policies, funding wellness efforts, and more. The FNS Local School Wellness Policies website can be accessed at http://www.fns.usda.gov/tn/local-school-wellness-policy.

Additionally, FNS' "School Nutrition Environment and Wellness Resources" web page provides information and resources to support the local school wellness policy process, and includes sample policy language, examples of existing State-level health policies, stories and best practice ideas for schools, grants and funding opportunities, and trainings to assist districts/schools in developing, implementing, and monitoring their wellness policies. The

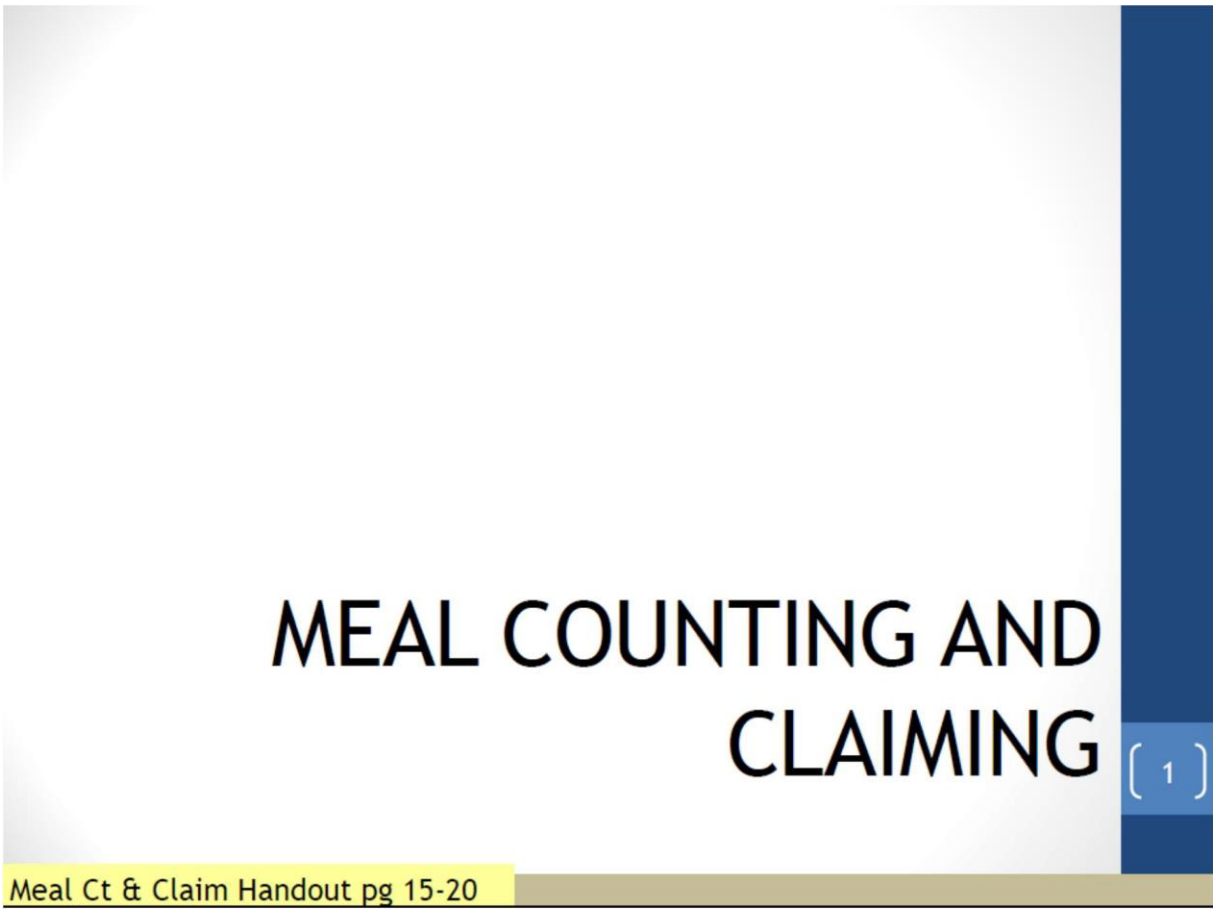
resources website can be accessed at https://healthymeals.fns.usda.gov/school-wellness-resources.

The CDC also has many resources that can help inform the content and implementation of wellness policies. There are resources on topics that include Smart Snacks, physical activity and physical education, measuring Body Mass Index in schools, and engaging parents to participate in school wellness activities. CDC also has assessment tools including the School Health Index which schools can use to assess their health policies and practices and then create a plan to improve their health and safety policies and practices. These helpful CDC resources can be accessed at www.cdc.gov/healthyyouth/npao/publications.htm.

CDC's "Putting Local School Wellness Policies to Action: Stories from School Districts and Schools" provides helpful strategies and examples for additional resources for schools. This resource can be accessed at https://www.cdc.gov/healthyyouth/npao/pdf/251553_SchoolWellnessInAction_Final_508_Ready_508tagged.pdf.

Meal Counting and Claiming

Can be found here: http://doe.sd.gov/cans/documents/NSLPMealC.pdf



MEAL COUNTING AND CLAIMING

Meal Ct & Claim Handout pg 15-20

It all begins with the application & agreement

- Each SFA makes application to and enters into agreement with the State Agency (SA) each year.
- The SFA also submits for approval a Free and Reduced Price Policy Statement.
- Important for administration

  and operation

  to communicate.

Meal Counting and Claiming

Five points of an acceptable counting and claiming procedure required by the USDA include:

1. Eligibility documentation
2. Collection procedures (money)
3. Point of service meal counts
4. Claim for reimbursement
5. Internal controls

Meal Counting and Claiming

1. Eligibility documentation
   - Documentation or proof for every student that receives free or reduced priced meals.
     - Free and Reduced Price Meal Applications
     - Direct Certification – Documentation that shows a child is eligible for free meals based on other program information.
   - Verification:
     - By random selection within the rules of Verification
     - Confirmation review
     - Verification For Cause

Meal Counting and Claiming

APPLICATION FOR FREE MILK 2014-15 ☐ New Applicant ☐ Previous Applicant

(See next page for complete instructions.)

To apply for free milk, fill out this application and sign your name.

Part 1. Children's Names

Child's Name	School or Center	Foster	Age	Child's Name	School or Center	Foster	Age
1				4			
2				5			
3				6			

Part 2. Households receiving SNAP, TANF, or FDPIR: If any member of your household is NOW receiving SNAP, TANF, or FDPIR but you did not receive a notice of direct certification from the school, list the CASE NUMBER. Fill out Sections 1, 2, and 3. The application MUST have the signature of an adult.

SNAP Case Number: TANF Case Number: FDPIR Case Number:

Part 3. Is this child migrant, homeless, or runaway? If yes, check the appropriate box: Homeless ☐ Migrant ☐ Runaway ☐

Part 4. Total Gross Household Income– You must tell us how much and how often

C. Income – list the gross income for each pay day and "x" how often you get paid

Example: $100/monthly or $100/twice monthly or $100/every two weeks or $100/weekly

Please attach additional sheets to list more household members.

A. Name (List everyone in household)	B. Check if NO income	Income from work before deductions: weekly	every 2 weeks	Twice Monthly	Monthly	Welfare, child support, alimony: weekly	every 2 weeks	Twice Monthly	Monthly	Pensions, retirement, Social Security: weekly	every 2 weeks	Twice Monthly	Monthly	Farm/Other: Monthly	Quarterly	Annually	Other (list)
Example: Jane Smith	☐	*$199.99*	X			*$85.00*		X		*$94.72*			X	$25,000			X	
	☐																	
	☐																	
	☐																	
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Part 5. Signature and Social Security Number (Adult MUST sign)

An adult household member must sign the application. If Part 4 is completed, the adult signing the form must also list only the last four digits of his or her Social Security Number or mark the "I do not have a Social Security Number" box. (See Privacy Act Statement on the next page.)

I certify (promise) that all information on this application is true and that all income is reported. I understand that the school/center will get Federal funds based on the information I give. I understand that officials may verify (check) the information. I understand that if I purposely give false information, the children may lose milk benefits, and I may be prosecuted.

Sign here: Date:

Last 4 digits of Social Security Number: ___ ___ ___ ___ ☐ I do not have a Social Security Number

Printed Name: Home Phone: Work Phone:

Mailing Address: Email Address:

City: State: Zip Code:

Part 6. Participant's ethnic and racial identities (optional)

Mark one ethnic identity: ☐ Hispanic or Latino ☐ Not Hispanic or Latino

Mark one or more racial identities: ☐ Asian ☐ American Indian or Alaska Native ☐ White ☐ Native Hawaiian or Other Pacific Islander ☐ Black or African American

FOR SCHOOL/CENTER USE ONLY

Total income & how often: ____ / ____ Household size: ____

SNAP / FDPIR / TANF or other eligible program household categorically eligible free: ☐ Yes ☐ No

Number of foster children eligible for:

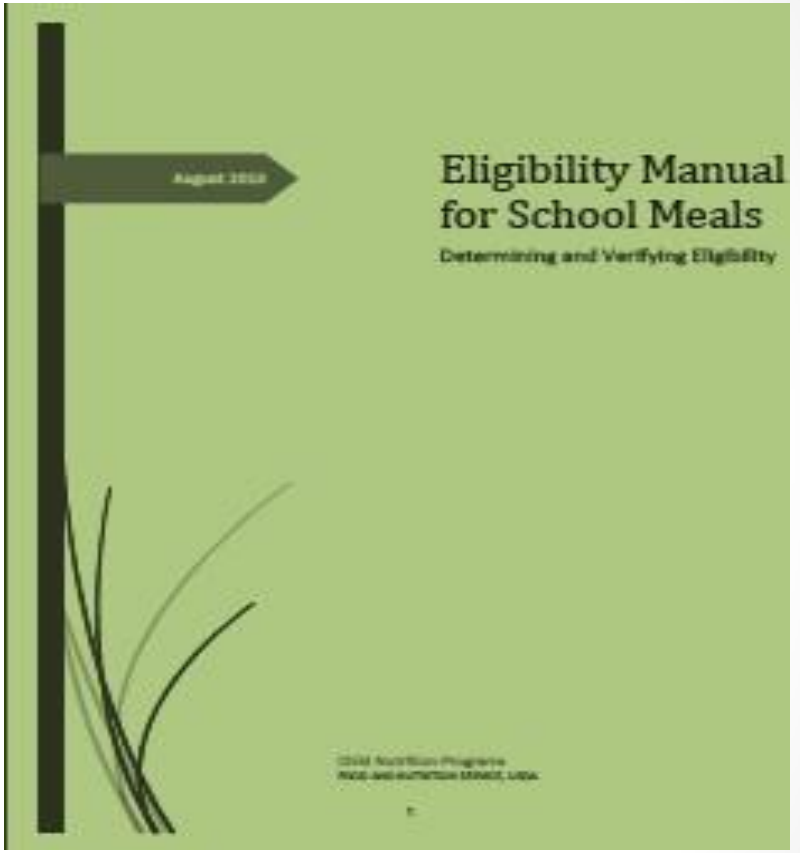
Eligibility classification: ☐ Free Kids ☐ Paid Kids

Date notification sent: Date withdrawn or transferred:

Signature of Determining Official: Date:

Signature of Confirmation Official: Date:

Families can apply for meal benefits



http://www.fns.usda.gov/cnd/guidance/default.htm

Meal Counting and Claiming

2. Collection procedures
   - How students pay for their meals
   - Avoid overt identification

Meal Counting and Claiming

3. Point of service meal counts
   a) Identification of reimbursable meals
   b) By eligibility type (F/R/P)
   c) Every day and every meal
   d) Without overt identification

Remember: Only one lunch and one breakfast can be counted for reimbursement per student, per day.

Meal Counting and Claiming

3. Point of service meal counts *(continued)*
   - **What is a reimbursable meal?**
     - Depends on agreement with CANS
     - No OVS:
       - Lunch: Must contain all 5 components in minimum required quantity
       - Breakfast: Must contain 3 components/food items in minimum required quantity
     - Offer vs serve:
       - Lunch: Student must take 3 of 5 components and 1 must be ½ c fruit &/or veg
       - Breakfast: Must contain 4 food items. Student must take 3 food items and 1 must be ½ c fruit

Meal Counting and Claiming

3. Point of service meal counts *(continued)*
   - Only 1 breakfast & 1 lunch per student, per day can be counted and claimed
   - None of the following can be included in your claim:
     - Meals served as seconds or second meals
     - Meals served to adults
     - Meals served to children who are not part of your program
     - Meals served to children who are not enrolled at your SFA

Meal Counting and Claiming

4. What happens after the meals are counted?
   - Recorded either on paper forms or in a computer
   - End of the month the counts are totaled
   - Edit checks are completed
   - Claim is filed

All meals served in the NSLP/SBP and counted for reimbursement must meet the requirements for the current meal pattern as specified in the program regulations and must be served to eligible students.

Meal Counting and Claiming

5. Internal controls
   - SFA must have controls sufficient to ensure meal counting and claiming accuracy and integrity.
   - Have a backup plan – a second person, a second method.

Afterschool Snack Meal Pattern

SELECT TWO OF THE FOUR COMPONENTS FOR A REIMBURSABLE SNACK

FOOD COMPONENTS AND FOOD ITEMS[1]	CHILDREN AGES 1 and 2	CHILDREN AGES 3-5	CHILDREN AGES 6-12[1]
Milk Fluid milk	4 fl. oz. (1/2 cup)	4 fl. oz. (1/2 cup)	8 fl. oz. (1 cup)
Vegetable or Fruit[2, 9]			
Juice[2,9], fruit, and/or vegetable	1/2 cup	1/2 cup	3/4 cup
Grains/Breads[3, 4]			
Bread or	1/2 slice	1/2 slice	1 slice
Cornbread or biscuit or roll or muffin or	1/2 serving	1/2 serving	1 serving
Cold dry cereal4 or	1/4 cup or 1/3oz.[4]	1/3 cup or 1/2oz.[4]	3/4 cup or 1oz.[4]
Cooked cereal grains or	1/4 cup	1/4 cup	1/2 cup
Cooked pasta or noodles	1/4 cup	1/4 cup	1/2 cup
Meat/Meat Alternate[5, 6, 7]			
Lean meat or poultry or fish[5] or	1/2 oz.	1/2 oz.	1 oz.
Alternate protein products[6] or	1/2 oz.	1/2 oz.	1 oz.
Cheese or	1/2 oz.	1/2 oz.	1 oz.
Egg (large) or	1/2 large egg	1/2 large egg	1/2 large egg
Cooked dry beans or peas or	1/8 cup	1/8 cup	1/4 cup
Peanut or other nut or seed butters or	1 Tbsp	1 Tbsp	2 Tbsp
Nuts and/or seeds[7] or	1/2 oz.[7]	1/2 oz.[7]	1 oz.
Yogurt[8]	2 oz. or 1/4 cup	2 oz. or 1/4 cup	4 oz. or 1/2 cup

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

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

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

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

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

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

[7] Nuts and seeds are generally not recommended to be served to children ages one to three since they present a choking hazard. If served, nuts and seeds should be finely minced.

[8] Yogurt may be plain or flavored, unsweetened, or sweetened – commercially prepared.

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

Smart Snack Cover

Smart Snack Standards

Can be found here: https://doe.sd.gov/cans/documents/SSsumchar.pdf

Smart Snack Calculator

Can be found here:
https://foodplanner.healthiergeneration.org/calculator/

Smart Snack Standards

Can be found here: https://doe.sd.gov/cans/documents/SSsumchar.pdf

Nutrition Standards for All Foods Sold in School

Food/Nutrient	Standard	Exemptions to the Standard
General Standard for Competitive Food.	To be allowable, a competitive FOOD item must: (1) meet all of the proposed competitive food nutrient standards; and (2) be a grain product that contains 50% or more whole grains by weight or have whole grains as the first ingredient*; *or* (3) have as the first ingredient* one of the non-grain main food groups: fruits, vegetables, dairy, or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); *or* (4) be a combination food that contains at least ¼ cup fruit and/or vegetable; or (5) contain 10% of the Daily Value (DV) of a nutrient of public health concern (i.e., calcium, potassium, vitamin D, or dietary fiber). Effective July 1, 2016 this criterion is obsolete and may not be used to qualify as a competitive food. *If water is the first ingredient, the second ingredient must be one of items 2, 3 or 4 above.	• Fresh fruits and vegetables with no added ingredients except water are exempt from all nutrient standards. • Canned and frozen fruits with no added ingredients except water, or are packed in 100% juice, extra light syrup, or light syrup are exempt from all nutrient standards. • Canned vegetables with no added ingredients except water or that contain a small amount of sugar for processing purposes to maintain the quality and structure of the vegetable are exempt from all nutrient standards.

Nutrition Standards for All Foods Sold in School

Food/Nutrient	Standard	Exemptions to the Standard
General Standard for Competitive Food.	To be allowable, a competitive FOOD item must: (1) meet all of the proposed competitive food nutrient standards; and *(2)* be a grain product that contains 50% or more whole grains by weight or have whole grains as the first ingredient*; *or* *(3)* have as the first ingredient* one of the non-grain main food groups: fruits, vegetables, dairy, or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); *or* (4) be a combination food that contains at least ¼ cup fruit and/or vegetable; or (5) contain 10% of the Daily Value (DV) of a nutrient of public health concern (i.e., calcium, potassium, vitamin D, or dietary fiber). Effective July 1, 2016 this criterion is obsolete and may not be used to qualify as a competitive food. *If water is the first ingredient, the second ingredient must be one of items 2, 3 or 4 above.	• Fresh fruits and vegetables with no added ingredients except water are exempt from all nutrient standards. • Canned and frozen fruits with no added ingredients except water, or are packed in 100% juice, extra light syrup, or light syrup are exempt from all nutrient standards. • Canned vegetables with no added ingredients except water or that contain a small amount of sugar for processing purposes to maintain the quality and structure of the vegetable are exempt from all nutrient standards.
NSLP/SBP Entrée Items Sold A la Carte.	Any entrée item offered as part of the lunch program or the breakfast program is exempt from all competitive food standards if it is sold as a competitive food on the day of service or the day after service in the lunch or breakfast program.	
Sugar-Free Chewing Gum	Sugar-free chewing gum is exempt from all competitive food standards.	
Grain Items	Acceptable grain items must include 50% or more whole grains by weight, or have whole grains as the first ingredient.	
Total Fats	Acceptable food items must have ≤ 35% calories from total fat as served.	• Reduced fat cheese (including part-skim mozzarella) is exempt from the total fat standard. • Nuts and seeds and nut/seed butters are exempt from the total fat standard.

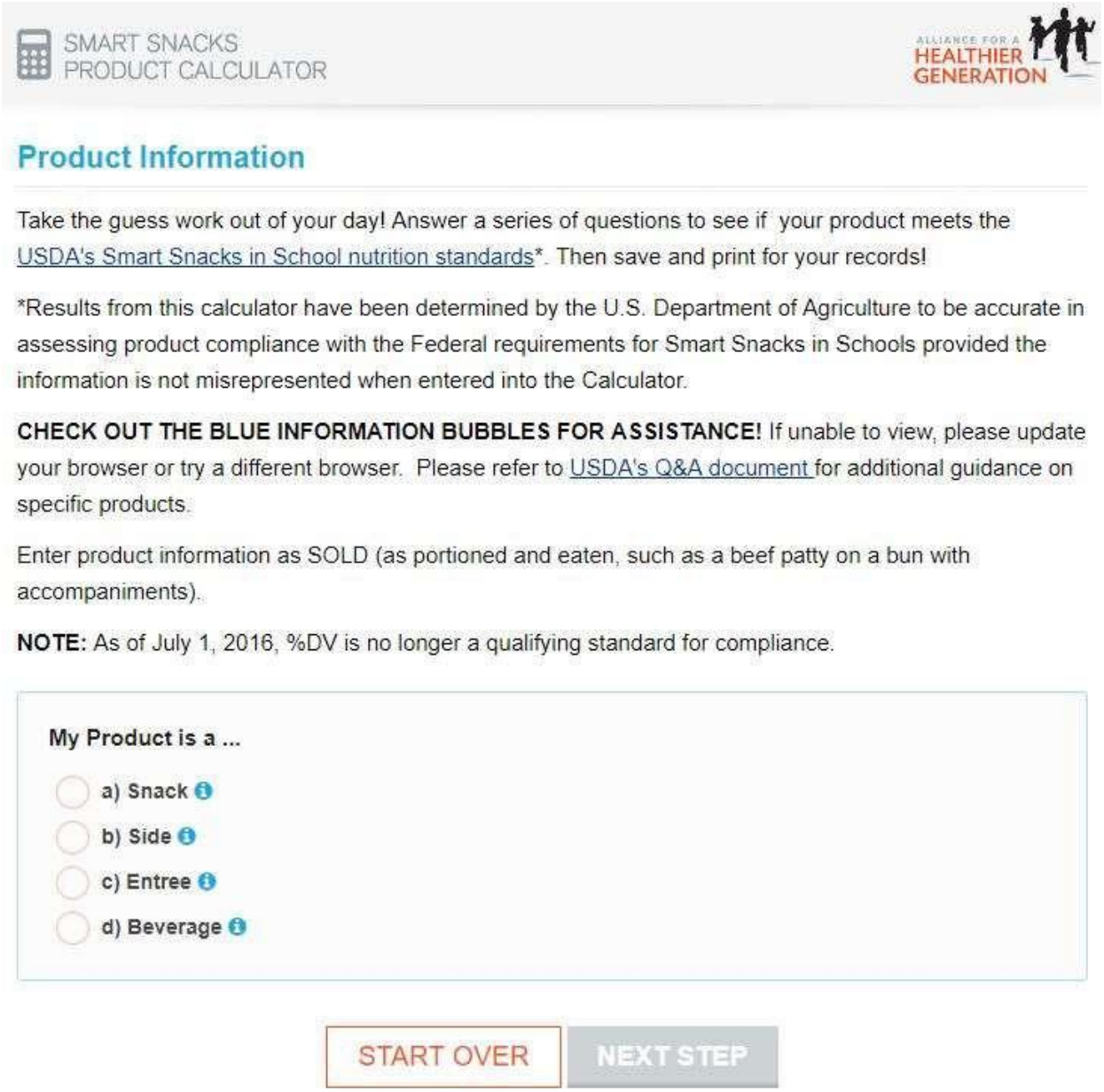
Food/Nutrient	Standard	Exemptions to the Standard
		• Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the total fat standard. • Seafood with no added fat is exempt from the total fat standard. Combination products are not exempt and must meet all the nutrient standards.
Saturated Fats	Acceptable food items must have < 10% calories from saturated fat as served.	• Reduced fat cheese (including part-skim mozzarella) is exempt from the saturated fat standard. • Nuts and seeds and nut/seed butters are exempt from the saturated fat standard. • Products consisting of only dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the saturated fat standard. Combination products are not exempt and must meet all the nutrient standards.
Trans Fats	Zero grams of trans fat as served (≤ 0.5 g per portion).	
Sugar	Acceptable food items must have ≤ 35% of weight from total sugar as served.	• Dried whole fruits or vegetables; dried whole fruit or vegetable pieces; and dehydrated fruits or vegetables with no added nutritive sweeteners are exempt from the sugar standard. • Dried whole fruits, or pieces, with nutritive sweeteners that are required for processing and/or palatability purposes (i.e., cranberries, tart cherries, or blueberries) are exempt from the sugar standard.

Food/Nutrient	Standard	Exemptions to the Standard
		• Products consisting of only exempt dried fruit with nuts and/or seeds with no added nutritive sweeteners or fats are exempt from the sugar standard.
Sodium	Snack items and side dishes sold a la carte: ≤ 230 mg sodium per item as served. Effective July 1, 2016 snack items and side dishes sold a la carte must be: ≤200 mg sodium per item as served, including any added accompaniments. Entrée items sold a la carte: ≤480 mg sodium per item as served, including any added accompaniments.	
Calories	Snack items and side dishes sold a la carte: ≤ 200 calories per item as served, including any added accompaniments. Entrée items sold a la carte: ≤350 calories per item as served including any added accompaniments.	• Entrée items served as an NSLP or SBP entrée are exempt on the day of or day after service in the program meal.
Accompaniments	Use of accompaniments is limited when competitive food is sold to students in school. The accompaniment must be included in the nutrient profile as part of the food item served and meet all proposed standards.	
Caffeine	Elementary and Middle School: foods and beverages must be caffeine-free with the exception of trace amounts of naturally occurring caffeine substances. High School: foods and beverages may contain caffeine.	
Beverages		
Beverages	Elementary School • Plain water or plain carbonated water (no size limit); • Low fat milk, unflavored (≤8 fl oz); • Non fat milk, flavored or unflavored (≤8 fl oz), including nutritionally equivalent milk alternatives as permitted by the	

Food/Nutrient	Standard	Exemptions to the Standard
	school meal requirements; • 100% fruit/vegetable juice (≤8 fl oz); and • 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤8 fl oz). Middle School • Plain water or plain carbonated water (no size limit); • Low-fat milk, unflavored (≤12 fl oz); • Non-fat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; • 100% fruit/vegetable juice (≤12 fl oz); and • 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤12 fl oz). High School • Plain water or plain carbonated water (no size limit); • Low-fat milk, unflavored (≤12 fl oz); • Non-fat milk, flavored or unflavored (≤12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements; • 100% fruit/vegetable juice (≤12 fl oz); • 100% fruit/vegetable juice diluted with water (with or without carbonation), and no added sweeteners (≤12 fl oz); • Other flavored and/or carbonated beverages (≤20 fl oz) that are labeled to contain ≤5 calories per 8 fl oz, or ≤10 calories per 20 fl oz; and • Other flavored and/or carbonated beverages (≤12 fl oz) that are labeled to contain ≤40 calories per 8 fl oz, or ≤60 calories per 12 fl oz.	

Smart SnackCalculator

Can be found here: https://foodplanner.healthiergeneration.org/calculator/



SD Policy on Exempt Fundraisers

Background:
The Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010 regulations (commonly referred to as Smart Snack regulations) require that states establish a policy regarding the number of fundraisers selling foods that otherwise would not be allowed (called exempt fundraisers) that can be held in schools. The regulation states that they should be infrequent.

According to federal guidelines, lack of a policy means that no exempt fundraisers can be held.

Federal regulation stipulates that no specially exempted fundraiser foods or beverages may be sold in competition with school meals in the food service area during the meal service.

As defined in federal regulation for the purpose of competitive food standards implementation:

- School campus means all areas of the property under the jurisdiction of the school that are accessible to students during the school day.
- School day means the period from the midnight before, to 30 minutes after the end of the official school day.

Policy:
The South Dakota policy regarding exempt fundraisers is as follows:

1. School-sponsored groups can each have one exempt fundraiser per year during the school day on the school campus. Non school-sponsored groups cannot have fundraisers involving unallowable foods during the school day.
2. Each exempt fundraiser can only last for one day.
3. Exempt fundraisers cannot be given to another group. If an organized group chooses not to have an exempt fundraiser, another group cannot use that day.
   Food cannot be ordered for delivery during the school day as a fundraiser, unless that is the school-sponsored group's exempt fundraiser. This would include any food ordered at any time and delivered to the student(s) during the school day.

Data will be collected and analyzed at the end of '14-15 school year on how the rule affected the fundraising of the school groups. A determination will then be made as to whether the exempt fundraising policy should be changed.

Additional Information:
Schools can be more restrictive such as by modifying their local wellness policy. The following areas are not affected by the federal regulation but can be restricted by the school:

- Fundraising activities involving foods that happen outside of school
- Groups other than school-sponsored groups selling allowable foods or nonfood items during the school day
- Concession stands operating outside of school hours or in areas not available to students during the school day
- Treats brought in to give away to students such as classroom parties
- Foods not intended for consumption at school (such as frozen pizza, frozen bread dough, frozen cookie dough)
- Foods sold in areas not accessible to students
- Food given to students at no charge by others, such as booster groups
- Foods that are not part of fundraisers ordered by individual students to be delivered to them

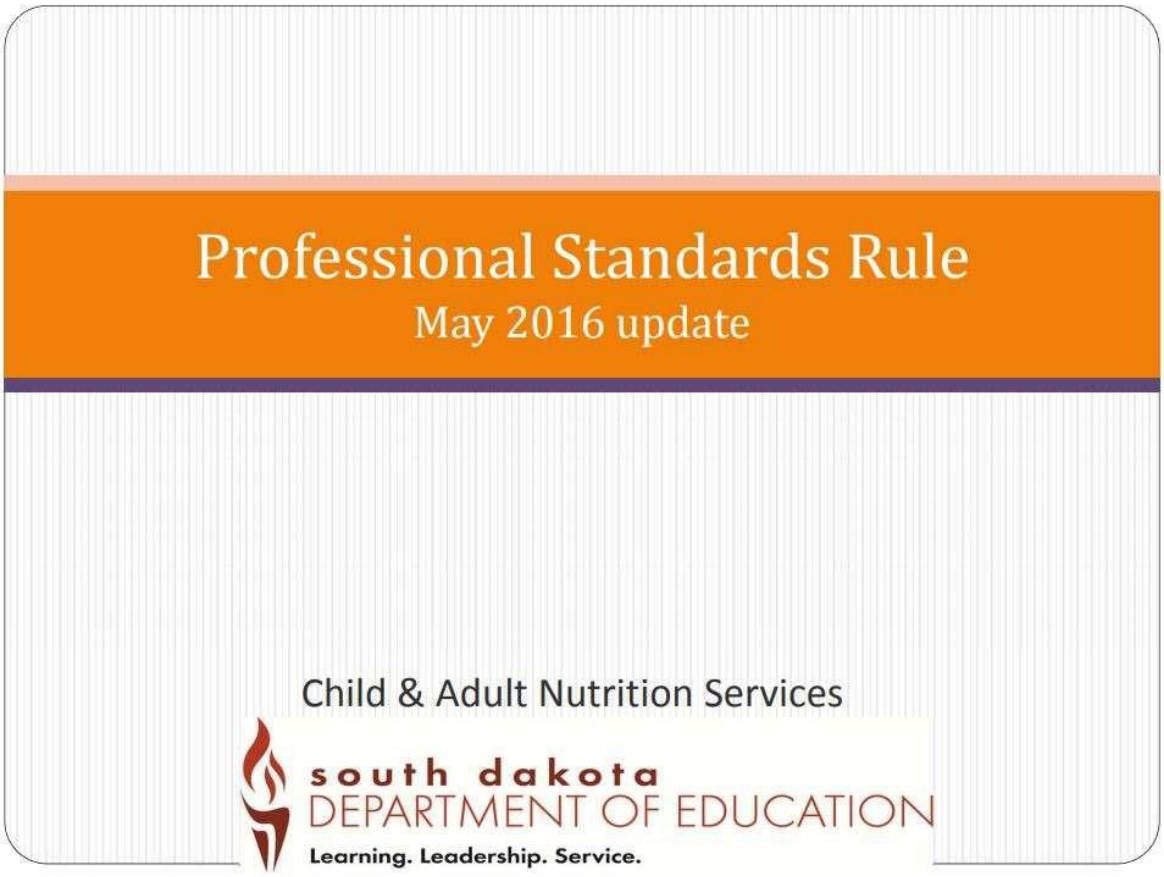
It should be noted that many fund raising opportunities exist that do not involve food. There are no limits imposed by this policy on those fund raising activities.

Culinary Arts Programs must also comply with these rules as outlined in USDA Policy Memo SP 40-2014 issued April 22, 2014.

Additional Resources:
US Department of Agriculture - http://www.fns.usda.gov/school-meals/smart-snacks-school
SD Department Of Education/Child & Adult Nutrition Services - http://www.doe.sd.gov/cans/
Alliance for Healthier Generation Smart Snacks Calculator - https://www.healthiergeneration.org/

Professional Standards Rule

Can be found here: https://doe.sd.gov/cans/documents/1016-ProSt.pdf



Professional Standards Cover

Professional Standards Rule

Can be found here: https://doe.sd.gov/cans/documents/20-ProStandards.pptx

Hiring/Annual Training Handout

Can be found here: https://doe.sd.gov/cans/documents/SD-ProStandards.pdf

SD Training Tracker Tool

Can be found here: http://doe.sd.gov/cans/documents/SDTrain17.xlsx

Professional Standards Rule

May 2016 update

Child & Adult Nutrition Services

south dakota
DEPARTMENT OF EDUCATION
Learning. Leadership. Service.

Professional Standards Regulation

Sets Minimum Standards for:

- **Hiring Standards** for “School Nutrition Directors”
- **Annual Training requirements** for all school nutrition staff

Why does School Nutrition have Professional Standard Requirements?

- To ensure that school nutrition personnel involved in the National School Lunch and School Breakfast Programs have the **knowledge and skills** to manage and operate the programs correctly and successfully.

- As you know, it takes more than great cooking skills to run the School Nutrition Programs!

Annual Training Requirements

For **all** School Nutrition Employees

effective July 1, 2015

Annual Training Requirements

	SY 15-16	Starting SY 16-17
Directors	8 hours	12 hours
Managers	6 hours	10 hours
Other Staff	4 hours	6 hours
PT Staff (<20hr/wk)	4 hours	4 hours

School Nutrition Program Directors must have 8-hours of food safety training **every five years**.

Position Definitions ≠ Job Titles

- **Position Descriptions under Professional Standards do not always match job titles at the school!**
- **School Nutrition Program Directors**
  - individuals **directly responsible for the management of the day-to-day operations** of school food service for all participating schools under the jurisdiction of the school food authority
- **School Nutrition Program Managers**
  - individuals **directly responsible for the management of the day-to-day operations** of school food service for a participating school(s)

Position Definitions

- **School Nutrition Program Staff**
  - individuals, **without managerial responsibilities, involved in the day-to-day operations** of school food service for a participating school(s)

- This can include:
  - Cooks and All Foodservice Staff
  - Cashiers
  - Dishwashers
  - Others involved in prep and service of school meals
  - Staff involved in eligibility determinations
  - Staff involved in meal counting and claiming
  - Support staff that have an impact on food safety

Shared Roles in the SFA

- If the school nutrition program (SNP) director role is shared between multiple people (Business Manager, Administrative Assistant, Principal, etc.):
  - The individual that **plans, administers, implements, monitors, and evaluates** all aspects of the SNP is considered the school nutrition program director.
  - Program director duties: sanitation, food safety, employee safety, nutrition and menu planning, food production, procurement/ purchasing, financial mgt & recordkeeping, program accountability, and more
- Only the person who performs the majority of the SNP duties must meet the training standards for program directors.

Food Service Management Companies

- Annual training requirements apply to FSMC employees at the school.
- Who is the "director"?
  - If the SFA is overseeing & responsible for planning, administering, implementing, monitoring, & evaluating the school meal programs:
    - Director remains with the SFA
  - If an FSMC staff member performs "director" duties:
    - Both the FSMC staff person and the SFA contact must meet the hiring standards
  - The SFA must maintain documentation for FSMC compliance with this rule

Other Staff that *May* Fall Under the Professional Standards Requirements

- Janitors
  - If they help prepare food or serve food
- Food Delivery Drivers
  - If they monitor refrigeration, food temps, inventory/delivery sheets

Exempt Staff

- **Volunteers** are not required to follow professional standard requirements, unless they have an impact on food safety or a greater responsibility in SNP operations

- **Staff that provide support** but not involved in the operation of the SNP, like a custodian is not required

Exempt Staff, continued

- **Office staff** that help process free and reduced-price meal applications or provide other SNP support **for a short time**.
  - If these staff help throughout the school year the staff are required to follow professional standards.

- **Temporary, Substitute, Acting**: If these positions are for a very limited time they are exempt. If these positions run for a long time during the school year, they must comply with the requirements

Key Learning Areas

- All training must fit into these categories:
  - Nutrition - 1000
  - Operations - 2000
  - Administration - 3000
  - Communications & Marketing - 4000

- Training should focus on day-to-day management and operation of SNP
- Training must be job-specific and intended to help employees perform their duties well

Training that Does Not Count

- Security procedures
- Building operations
- Motivational speaker lectures
- Board meetings or other types of meetings
- Advocacy discussions
- SNA or ACDA leadership

How to obtain training hours?

- In Person Trainings, Conferences, Classes
  - Who can provide training to staff?
  - SNP Directors, Managers, Registered Dieticians, Nurses, School Nutrition Staff, CANS, SNA, etc.
- Webinar: Live or Pre-recorded
  - USDA Professional Standards webpage - http://professionalstandards.nal.usda.gov/
  - Institute of Child Nutrition - www.theicn.org
  - CANS Webpage - http://doe.sd.gov/cans
  - School Nutrition Association - https://schoolnutrition.org
- Check in with CANS conference calls

What do I need for documentation?

- Upon completing training, School Food Authorities must track:
  - Employee name
  - Date of training
  - Length of training (15 minute increments, minimum)
  - Training Topic Area
  - Number of training hours completed

How do I track my training?

- How to track is up to each School Nutrition Director to decide what method works best.

- Suggestions include:
  - SD Training Tracker (Excel spreadsheet, on CANS site)
  - USDA Training Tracker (Access database)
  - Notebook with a File Folder to keep Certificates, Agendas, Handouts, etc.

- Records must be maintained by each SFA and made available to the State agency upon request

Hiring Standards

For new School Nutrition Directors

effective July 1, 2015

Hiring Requirements

- New directors hired on or after July 1, 2015 must meet the hiring requirements
  - Existing directors will be grandfathered in their current positions.
- Hiring requirements are broken down based on student enrollment

Hiring Requirements – 10,000 or more

- Bachelor's degree, or equivalent with academic major in specific areas*

OR

- Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors

OR

- Bachelor's degree in any academic major and at least 5 yrs experience in management of school nutrition programs.

***Specific majors/areas of concentration:** Food & nutrition, food service mgt, dietetics, family & consumer sciences, nutrition education, culinary arts, business, or a related field.*

Hiring Requirements – 2,500 – 9,999

- Bachelor's degree, or equivalent with academic major in specific areas*

OR

- Associate's degree or equivalent with academic major in specific areas* and at least 2 years of school nutrition program experience

OR

***Specific majors/areas of concentration:** Food & nutrition, food service mgt, dietetics, family & consumer sciences, nutrition education, culinary arts, business, or a related field.*

Hiring Requirements – 2,500-9,999 continued

- Bachelor's degree in any academic major and at least 2years of school nutrition program experience

OR

- Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors (School Nutrition Association SNS Certification)

Hiring Requirements – 2,499 or less

- Bachelor's degree or equivalent with academic major in specific areas*

OR

- Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors (School Nutrition Association SNS Certification)

OR

- Associate's degree or equivalent with academic major in specific areas* and at least 1 year of school nutrition program experience

***Specific majors/areas of concentration:** Food & nutrition, food service mgt, dietetics, family & consumer sciences, nutrition education, culinary arts, business, or a related field.*

Hiring Requirements – 2,499 or less continued

OR

- High school diploma (or GED) and at least 3 years of experience in school nutrition programs

Hiring Requirements – Less than 500

- Small LEAs with less than 500 students, the State agency may approve the hiring of a director that has a high school diploma/GED but less than 3 years of experience.

- **LEAs must contact the State agency as soon as possible if this situations occurs. You will be asked for the following information:**
  - Name of Applicant
  - Applicants High School and Higher Education
  - Relevant School Nutrition Program Experience
  - Date of Food Safety Training (8-hrs)
  - A description of hiring process (announce and/or advertise)
  - A description of why this applicant was the best choice out of the other applicants

Hiring Requirements

- An SFA must select the most qualified individual that meets the hiring standard, an SFA cannot hire someone that does not meet the hiring requirement
- **Hiring a director that does not meet the hiring standards cannot have their wages paid from the school food service account**
  - Wages can be paid from the LEA's general fund
  - Wages are considered an unallowable cost until compliance with this regulation is obtained
  - **A state approval to hire a noncompliant candidate does not waive this rule**

State Agency Requirements

effective July 1, 2015

State Agency Director Requirements

Professional Standards regulations also set standards for the state:

- Hiring Requirements for:
  - State agency directors of school nutrition programs
  - State agency directors of distributing agencies (USDA Foods)

- Must provide 18 hours of school nutrition program training each year.

Professional Standards Resources

Training Resources

- South Dakota National School Lunch and Breakfast training opportunities & webinars: http://doe.sd.gov/cans/nslp.aspx
- Institute of Child Nutrition free on-line & in-person training: http://www.nfsmi.org/Templates/TemplateDefault.aspx?qs=cElEPTU3
- Food Safety Training and other resources: http://www.fns.usda.gov/food-safety/food-safety
- Free & low-cost training resources from USDA: http://professionalstandards.nal.usda.gov/

Training Tracking Tool Resources

- SD Training Tracking Tool & information http://doe.sd.gov/cans/nslp.aspx
- USDA Tracking Tool http://www.fns.usda.gov/school-meals/professional-standards

Final Regulation & more

- Professional Standards Guidance Manual: http://www.fns.usda.gov/sites/default/files/tn/ps_guide-highres.pdf
- Final Professional Standards regulation, questions and answers memo, and additional information: http://www.fns.usda.gov/school-meals/professional-standards

Professional Standards Rule

November, 2015

This training credits for 30 minutes of training in **Key Area: Administration 3430 Training Plans & Tracking**

Child & Adult Nutrition Services

south dakota
DEPARTMENT OF EDUCATION
Learning. Leadership. Service.

Thank you!

South Dakota Dept. of Education

Child and Adult Nutrition Services

MacKay Building

800 Governors Drive

Pierre, SD 57501

(605) 773-3413

DOE.SchoolLunch@state.sd.us

This institution is an equal opportunity provider and employer.

Hiring/Annual Training Handout

Can be found here: https://doe.sd.gov/cans/documents/SD-ProStandards.pdf

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Professional Standards for School Nutrition Program Employees

USDA has established minimum professional standards requirements for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs. The standards aim to institute minimum education standards for new state and local school nutrition directors as well as annual training standards for all school nutrition professionals.

Key Learning Areas:

All training will fit into one of these categories:

- Nutrition
- Operations
- Administration
- Communications & Marketing
- Additional topics if required by Secretary of USDA

Required Training for School Nutrition Program Employees (All Local Educational Agencies)

Directors

- School year 2015-16 ONLY: at least 8 hours of annual continuing education/training
- Beginning school year 2016-17: at least 12 hours of annual continuing education/training
  This required continuing education/training is in addition to the food safety training required in the first year of employment.

Managers

- School year 2015-16 ONLY: at least 6 hours of annual continuing education/training
- Beginning school year 2016-17: at least 10 hours of annual continuing education/training

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Professional Standards for School Nutrition Program Employees

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- Beginning school year 2016-17: at least 12 hours of annual continuing education/training
  This required continuing education/training is in addition to the food safety training required in the first year of employment.

Managers

- School year 2015-16 ONLY: at least 6 hours of annual continuing education/training
- Beginning school year 2016-17: at least 10 hours of annual continuing education/training

Other staff

- School year 2015-16 ONLY: at least 4 hours of annual continuing education/training
- Beginning school year 2016-17: at least 6 hours of annual continuing education/training

Part-time staff (work less than 20 hours per week)

- Each year: at least 4 hours of annual continuing education/training, regardless of the number of part-time hours worked

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- When one person is both the director and manager, the higher standards must be met.
- School year 2015-16: Training received three months prior to July 1, 2015, counts toward the first year's training requirements for all school food authority personnel.
- If hired Jan. 1 or later, an employee need only complete half of the required training hours.
- Find a database of training options at http://professionalstandards.nal.usda.gov/. Training is available in a variety of formats and from different sources.
- Districts determine in which categories employees need training.
- Documentation of individual training must be maintained at the school food authority.
- Providing/receiving training is an allowable use of the nonprofit school food service account.

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Hiring Standards for NEW School Nutrition Program Directors

New directors — those hired on or after July 1, 2015 — are subject to the new education requirements below. Existing directors will be grandfathered in their current positions as well as in the Student Enrollment category where they currently are working.

Minimum Requirement for Directors	Student Enrollment 2,499 or less	Student Enrollment 2,500-9,999	Student Enrollment 10,000 or more
Minimum Education Standards	Bachelor's degree, or equivalent educational experience, with academic major in specific areas;* OR Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors; OR Associate's degree or equivalent educational experience, with academic major in specific areas,* and at least one year of relevant school nutrition program experience; OR High school diploma (or GED) and at least three years of relevant experience in school nutrition programs. (LEAs with less than 500 students; state agency may approve a candidate that meets the educational standards but has less than three years of experience.)	Bachelor's degree, or equivalent educational experience, with academic major in specific areas;* OR Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors; OR Bachelor's degree in any academic major and at least two years of relevant school nutrition program experience; OR Associate's degree or equivalent educational experience, with academic major in specific areas, *and at least two years of relevant school nutrition program experience.	Bachelor's degree, or equivalent educational experience, with academic major in specific areas;* OR Bachelor's degree in any academic major and state-recognized certificate for school nutrition directors; OR Bachelor's degree in any academic major and at least five years of experience in management of school nutrition programs. ***Specific majors/areas of concentration:** Food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.
Minimum Prior Training Standards	An employee must complete at least eight hours of food safety training not more than five years prior to his or her starting date or within 30 days of his or her starting date.		

- School food authorities may hire a director that meets the employment requirements in place prior to July 1, 2015, if the vacancy is advertised prior to July 1.
- For very small local education agencies (less than 500 students), the South Dakota Department of Education has discretion to approve the hiring of a director that has a high school diploma but less than three years of experience.
- Find the final regulation and additional information at http://professionalstandards.nal.usda.gov/.

Definitions:

School nutrition program directors are those individuals directly responsible for the management of the day-to-day operations of school food service for all participating schools under the jurisdiction of the school food authority.

School nutrition program managers are those individuals directly responsible for the management of the day-to-day operations of school food service for a participating school(s).

School nutrition program staff are those individuals, without managerial responsibilities, involved in the day-to-day operations of school food service for a participating school(s).

SD Training Tracker Tool

Can be found here: http://doe.sd.gov/cans/documents/SDTrain17.xlsx

District Name:	Site Name:					School Year:				
Example Public School	**Example Elementary**					**2016-17**				
Please attach a list of all staff and their position in CN programs. Also attach the following information about each training event: Date, Hours, Type of Training, Training Category, and Documents.	Year is: July 1 through Jun 30	Report training in 15 minute increments	**1:** Face to face **2:** Webinar **3:** On-line **4:** Class **5:**Other	(1000) Nutrition (2000) Operations (3000) Administration (4000) Comm & Marketing	**1:** Sign-in sheets **2:** Handouts **3:** Agendas **4:** Certificates **5:** Other	**Staff Name**	Joni Mitchell	Jack Johnson	Taylor Swift	
						Prof Stnd Title	PT	Director	Manager	
Event	**Date**	**Hours**	**Type of Training**	**Training Category**	**Document Examples**	*Training must be reported in increme*				
HACCP	07/01/2016	8	4	2610	3		8.00	8.00	8.00	
Quality School Meals Webinar	07/10/2016	1	2	1000	2		0.00	1.00	1.00	
New equipment inservice	08/08/2016	0.5	1	2140	1		0.50	0.50	0.50	
All-Staff Inservice Day	08/22/2016	6	4	1000	1, 3		4.00	6.00	4.00	

District Name:	Site Name:					School Year:							
Example Public School	Example Elementary					2016-17							
Please attach a list of all staff and their position in CN programs. Also attach the following information about each training event: Date, Hours, Type of Training, Training Category, and Documents.	Year is: July 1 through Jun 30	Report training in 15 minute increments	1: Face to face 2: Webinar 3: On-line 4: Class 5:Other	(1000) Nutrition (2000) Operations (3000) Administration (4000) Comm & Marketing	1: Sign-in sheets 2: Handouts 3: Agendas 4: Certificates 5: Other	Staff Name	Joni Mitchell	Jack Johnson	Taylor Swift				
						Prof Stnd Title	PT	Director	Manager				
Event	Date	Hours	Type of Training	Training Category	Document Examples	Training must be reported in no less than 15 minute i n							
HACCP	07/01/2016	8	4	2610	3		8.00	8.00	8.00				
Quality School Meals Webinar	07/10/2016	1	2	1000	2		0.00	1.00	1.00				
New equipment inservice	08/08/2016	0.5	1	2140	1		0.50	0.50	0.50				
All-Staff Inservice Day	08/22/2016	6	4	1000	1, 3		4.00	6.00	4.00				
						Total	12.50	15.50	13.50	0.00	0.00	0.00	0.00

CANS Upd

crements.

0.00	0.00

ate: 1/13/2017

District Name:	Site Name:					School Year:							
Please attach a list of all staff and their position in CN programs. Also attach the following information about each training event: Date, Hours, Type of Training, Training Category, and Documents.	Year is: July 1 through Jun 30	Report training in 15 minute increments	1: Face to face 2: Webinar 3: On-line 4: Class 5:Other	(1000) Nutrition (2000) Operations (3000) Administration (4000) Comm & Marketing	1: Sign-in sheets 2: Handouts 3: Agendas 4: Certificates 5: Other	Staff Name							
						Prof Stnd	Director						
Event	Date	Hours	Type of Training	Training Code	Documents								Trainin
						Total	0.00	0.00	0.00	0.00	0.00	0.00	0.00

District Name:	Conversions: 15 minutes = 0.25, 30 minutes = 0.5, 45 minutes = 0.75																					
Please attach a list of all staff and their position in CN programs. Also attach the following information about each training event: Date, Hours, Type of Training, Training Category, and Documents.																						
Event	g must be reported in no less than 15 minute increments.																					
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

KEY AREA 1 - (1000) NUTRITION					
(1100) Menu Planning	(1200) Nutrition	(1300) General Nutrition			
(1110) USDA Nutrition Requirements	(1210) Nutrition Activities	(1310) Dietary Guidelines for Americans, MyPlate & School Nutrition			
(1120) Cycle Menus	(1220) Classroom & Cafeteria Integration	(1320) General Nutrition			
(1130) Local Foods - Farm to School	(1230) School Gardens				
(1140) Standardized Recipes					
(1150) Menu Analysis					
(1160) Special Diets, Including Food Allergies					
(1170) USDA Foods					
KEY AREA 2 - (2000) OPERATIONS					
(2100) Food Production	(2200) Serving Food	(2300) Cashier & Point of Service	(2400) Purchasing/Procurement	(2500) Receiving & Storage	(2600) Food Safety & HACCP
(2110) Standardized Recipes	(2210) Portion Sizes/Special Diets	(2310) Reimbursable Meals	(2410) Product Specifications	(2510) Inventory Management	(2610) HACCP
(2120) Food Production Records	(2220) Offer VS Serve	(2320) POS Financial Responsibility	(2420) Bid Solicitation & Evaluation	(2520) Receiving & Storage	(2620) Food Safety - General
(2130) Culinary Skills	(2230) Maintaining Food Quality & Appearance	(2330) Free or Reduced Identification	(2430) Purchase Food, Supplies & Equipment	(2530) Hold & Recall	(2630) Federal, State & Local Food Safety Regulations
(2140) Use & Care of Equipment	(2240) Serving Lines		(2440) Food & Supplies Orders		(2640) Food Safety Culture
(2150) CN Labeling, Crediting			(2450) Cooperative Purchasing Groups		
			(2460) Contracts with FS Management Co.		
KEY AREA 3 - (3000) ADMINISTRATION					
(3100) Free & Reduced Price Meal Benefits	(3200) Program Management	(3300) Financial Management	(3400) Human Resources & Staff Training	(3500) Facilities & Equipment Planning	
(3110) Eligibility	(3210) Staff Management	(3310) Meal Counting, Claiming, Managing Funds	(3410) Human Resources Management	(3510) Facility & Equipment Planning	
(3120) Direct Certification	(3220) Standardized Operating Procedures	(3320) Compliance with Regulations/Policies	(3420) Policies & Procedures	(3520) Equipment Purchasing & Maintenance	
(3130) Community Eligibility Provision (CEP)	(3230) Healthy School Environment	(3330) Budgets	(3430) Training Plans & Tracking		
	(3240) Emergency Plans	(3340) Financial Analysis	(3440) Retention, Promotion & Recognition		
	(3250) Water, Energy & Waste	(3350) Pricing	(3450) Employee Health, Safety &		
	(3260) Prep for Administrative Review	(3360) Communicate Financial Information			
KEY AREA 4 - (4000) COMMUNICATIONS & MARKETING					
(4100) Communications & Marketing					
(4110) Strategic & Marketing Plans					
(4120) Program Promotion					
(4130) Customer Service					
(4140) Communication Skills					
(4150) School & Community Communication					
(4160) Smarter Lunchrooms Techniques					

Update: 10/2016 CANS

Please do not touch this tab, otherwise it will effect your drop down titles.

Director
Manager
Full Time
Part Time
Other

Civil Rights Training
Child Nutrition programs

Presented by Child & Adult Nutrition Services
SD Department of Education

Based on presentation by the Civil Rights Division,
USDA Food and Nutrition Service in June 2015, and
November 2015 instructions/policies.

Presentation topics:

- Civil Rights coverage and legal authorities
- Areas of compliance
  - Assurances
  - Public notification requirements
  - Complaints of discrimination
  - Civil Rights training
  - Racial and ethnic data collection
  - Reasonable accommodation
  - Limited English Proficiency (LEP)/English Language Learners (ELL)
  - Compliance reviews

Abbreviations

- CFR = Codified Federal Regulation
- CR = Civil Rights
- DOJ = Department of Justice
- FNS = Food and Nutrition Services
- NSLP = National School Lunch Program
- SBP = School Breakfast Program
- SD = South Dakota
- SDCL = SD Codified Law
- SMP = Special Milk Program
- USDA = United States Department of Agriculture

Civil Rights Program Authorities

- Title VI of the Civil Rights of 1964
  race, color, and national origin
- Civil Rights Restoration Act of 1987
  clarifies the scope of the Civil Rights Act of 1964
- Sections 504 & 508 of the Rehabilitation Act of 1973 and Americans w/ Disabilities Act
  disability
- Title IX of the Education Amendments of 1972
  sex
- Age Discrimination Act of 1975
  age

Civil Rights Program Authorities

- 7 CFR Parts 15, 15a & 15b
- 7 CFR Part 210 (NSLP)
- 7 CFR Part 215 (SMP)
- 7 CFR Part 220 (SBP)
- 7 CFR Part 245 (NSLP/SMP/SBP) [Eligibility Regs]
- 7 CFR Part 250 and 247 (USDA Foods)

Civil Rights Program Authorities

- 28 CFR Part 42: Nondiscrimination in Federally Assisted Programs
- FNS Instruction113-1 Appendix B (NSLP, SMP, SBP); and C (Commodities)
- Executive Order 13166 – addresses/improves access requirements for persons with Limited English Proficiency (LEP)
- 7 CFR Part 16, "Equal Opportunity for Religious Organizations" – allows religiously affiliated organizations to compete equally for USDA assistance.
- USDA Departmental Regulation 4330-2 – prohibits discrimination in programs and activities receiving Federal financial assistance from USDA.

N w Policy M mo on **tat** m nt

http://www.fns.usda.gov/ civil-rights

See **Also**

- An d Ju stic e for All Posters
- FNS Nondisc rimination Statement (Fo.- State/ L o c a l A g e n c y U s e)
- USD A G uid ance fo .- F ilin g Oisc r-im i n a t i o n Complaints
- Diversity and Inclusion
- Learn about Alternative Dispute Resolution
- Laws , Regu la tio ns & Ot he r Guidan c e
- LimitedE nglishP ro ficie ncy
- FNS Data Posted Pus uant to the No Fear Act
- Civil Rights P olicies
- Frequently Asked Questions
- A b o ut the FNS Office of Civil Rights
- Civil Rights Di.-ec tory
- Links to Related Federal P ro grams

Civil Rights

Print

The Office of Civil Rights mission is to ensure compliance with applicable laws regulations and policies for FNS cu t o m esr and employees regardless of rac,e colo,r national origin religion, sex, gender identity (including gender expression), sexual orientation disability, marital status, family/ parental status, income derived fron, a public assistance program, political beliefs, or reprisal or retaliat ion for prior civil rights activit y, in any program or activit y conducted or funded by USDA. (Not all prohibited bases will apply to all programs and/ or employment acti vities.) Remedies and complaint fi ling deadlines vary by program or incident. The Off ice of Civil Rights also facilitates equal and t imely access t o FNS programs and services for all customers.

Our vision is to provide superior customer serv ice while ensuring equit y for all.

Las e Pu b li sh ed : 11/20/2015

FNS Nondiscrimination Statement

Tu esday, November 17, 2015

The Nondiscrim inat ion Statement (NDS} is for use by State and toe.al agencies and their subrecipients for all FNS Program s.

All documents, pamphlets, websites, etc. should be updated s follows:

1. Websites must be updated by December 31, **2.015;**
2. Documents, pamphlets, brochures, etc. using NDS language prior to 2013 must be updated by December 31, 2015;
3. Documents, pamphlets, brochures, etc. using 2.013 NDS language should be updated when supplies are exhausted or by September 30, 2016; and
4. All new printing must use the 2015 NDS.

Fli& Upload :

FNS Nondiscrrm1nat1on Statement (44 94 K6)

FNS Nond,str1m1na11on Statement (Spanish) (43 5 KB)

USDA Mission

Food and Nutrition Service Vision:

To End Hunger and Improve Nutrition in America

And

Food Nutrition Service Mission:

We work with partners to provide food and nutrition education to people in need in a way that inspires public confidence and supports American Agriculture.

What is discrimination?

DEFINITION:

Different treatment which makes a distinction of one person or a group of persons from others; either intentionally, by neglect, or by the actions or lack of actions based on…

Protected Bases for FNS Child Nutrition Programs

Six protected bases of Discrimination:

1) Race
2) Color
3) National Origin
4) Age
5) Sex
6) Disability

Title VI requires that….

"No person in the United States shall, on the ground of **race, color, or national origin**, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance."

-Civil Rights Act of 1964, Title VI, 42 U.S.C. § 2000d

…SHALL ON THE GROUND OF RACE, COLOR, OR NATIONAL ORIGIN…

We now go beyond the obvious that was in the original law:

"[R]ace, color or national origin" includes any **perceived** race, color, or national origin.

…any Program or Activity

Program or activity means:

"[A]ll of the operations of…

State and local governments

Educational institutions

Corporations & private organizations

…that receive federal financial assistance."

This means all Child Nutrition Programs

…BE EXCLUDED FROM PARTICIPATION IN, BE DENIED THE BENEFITS OF, OR BE SUBJECTED TO DISCRIMINATION…

- Recipients may not administer their programs or activities in a manner that "den[ies] any individual any . . . benefit provided under the program," or "restrict[s] an individual **in any way** in the enjoyment of any advantage or privilege enjoyed by others receiving any . . . benefit under the program."
- Recipients may not "utilize criteria or methods of administration **which have the effect** of subjecting individuals to discrimination because of their race, color, or national origin"
  - *Title VI Regulation*

Civil Rights Compliance Areas

- Assurances
- Public Notification
- Civil Rights Training
- Racial/Ethnic Data Collection
- Compliance Reviews
- Complaints of Discrimination
- Resolution of Noncompliance
- Customer Service
- Conflict Resolution
- Serving Clients with Disabilities
- Serving Clients with Limited English Proficiency

Assurances

- "To qualify for Federal financial assistance, the program application must be accompanied by a written assurance that the program or facility will be operated in compliance with the CR laws and implementing nondiscrimination regulations."

- A civil rights assurance must be incorporated in all agreements between State and local agencies.

Assurances

- State agencies must obtain assurance from each school or local agency. FNS will obtain a written assurance from each State agency.
- Vendor agreements and any other contracts must also include an assurance of nondiscrimination.

  Contract with Food Service Management Companies (FSMC) to provide food service to students. Thus, the SFA or responsible individual would be charged with ensuring that their FSMC is in compliance with CR requirements.
- 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 USDA.

Subrecipient Pre-award

- Prior to signing an agreement with a sub recipient, a pre-award review must be conducted.
- These reviews are conducted by the State Agency and are usually done as desk reviews of information provided by applicants in their official application to operate an FNS Federally-assisted program.
- No Federal funds shall be made available to a State or an entity until a Pre-Award Compliance Review has been conducted and the applicant has been determined to be in compliance with Title VI requirements.

Public Notification

- All FNS assistance programs must include a public notification system.

- The purpose of this system is to inform applicants, participants, and potentially-eligible persons of:

  - program availability,
  - program rights and responsibilities,
  - the policy of nondiscrimination and
  - the procedure for filing a complaint.

Elements of Public Notification

- **Program Availability**

  Inform applicants, participants, and potentially eligible persons of their program rights and responsibilities and the steps necessary for participation.

- **Complaint Information**

  Advise applicants and participants at the service delivery point of their right to file a complaint, how to file a complaint, and the complaint procedures.

- **Nondiscrimination Statement**

  All informational materials and sources, including Web sites, used by FNS, State agencies, local agencies, SFAs or other sub recipients to inform the public about FNS programs must contain a Nondiscrimination Statement. The statement is not required to be included on every page of the program Web site. At a minimum, the Nondiscrimination Statement or a link to it must be included on the home page of the program information.

Methods of Public Notification

State agency and/or School Food Authority must:

- Prominently display the "And Justice for All" poster.
- Inform potentially-eligible persons, applicants, participants and grassroots organizations of programs or changes in programs.
- Include the required Nondiscrimination Statement on all appropriate FNS and agency publications, Web sites, posters and informational materials used for public information.
- Convey the message of equal opportunity in all photos and other graphics that are used to provide program or program-related information.

Methods of Public Notification

- Include the Nondiscrimination statement on the application.
- Make program information available to the public upon request and Provide the information in alternative formats for persons with disabilities.
- Have the capability of providing informational materials in the appropriate language concerning the availability and nutritional benefits of the program(s).

Nondiscrimination

October 2015

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

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

  To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

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

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

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

  This institution is an equal opportunity provider.

Nondiscrimination Statement

At a minimum, the full Nondiscrimination Statement should be on:

- Application Form(s)
- Notification of Eligibility or Ineligibility
- Expiration of Certification Notification
- Discontinuance Notification
- Program (Home) Web Page
- Public Information materials including media

It does not have to be on menus that are sent home.

Nondiscrimination Statement

- The Nondiscrimination Statement should be used as is. Do not move it into paragraph format.
- You may shrink the spacing between the lines a little bit.
- It now may be in a smaller font than other font on the document, but must be easily readable.

“And Justice For All…” Poster

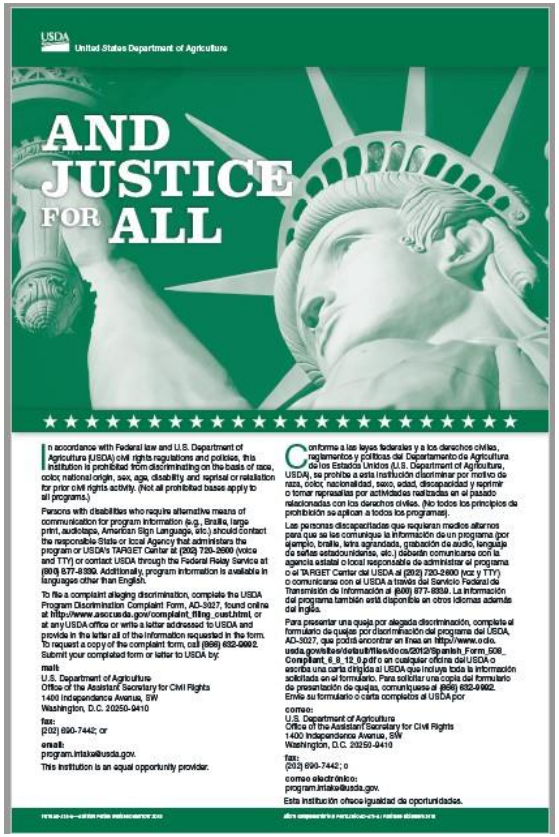
All sites must display the poster in a prominent location for all to view.

Display in classrooms if students don’t visit the cafeteria.

Local reproduction is authorized.

This is the new poster.

(Sent out summer of 2016)



Civil Rights Training

- State agencies are responsible for training staff, and beneficiaries/sub recipients whom hold an agreement with the State Agency on an **annual basis.**

- Beneficiaries/sub recipients are responsible for training their staff working with the program including “frontline staff” who interact with applicants or participants on an **annual basis**.

- New employees should be trained on Civil Rights requirements before participating in Program activities or within the first 30-days of hiring.

Civil Rights Training

Specific subject matter required, but not limited to:

- Collection and use of data;
- Effective public notification systems;
- Complaint procedures;
- Compliance review techniques;
- Resolution of noncompliance;
- Requirements for reasonable accommodation of persons with disabilities;
- Requirements for language assistance;
- Conflict resolution; and
- Customer service.

Civil Rights Training

- Staff should be able to identify a civil rights complaint if received;
- They should know what to do if they receive a complaint; and
- Understand that it is the basic right of the individual to file a complaint.

Bilingual Requirements and Program Access

Definition:

- Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.

- Recipients of Federal financial assistance have a responsibility to take "reasonable steps" to ensure meaningful access to their programs and activities by persons with Limited English Proficiency – *now called English Language Learners (ELL).*

- The term "program or activity" is broadly defined. There is no numerical threshold that must be met before provisions of the Civil Rights Act, prohibiting discrimination based on *national origin*.

Bilingual Requirements and Program Access

- Factors to consider in addressing ELL:
- Number or proportion of ELL persons served or encountered in the eligible population.
- Frequency with which ELL individuals come in contact with the program.
- Nature and importance of the program, activity, or service provided by the program.
- Resources available to the recipient and costs.

Bilingual Requirements and Program Access

- Title VI and its regulations require State agencies, local agencies, or other sub recipients to take reasonable steps to assure “meaningful” access to the information and services they provide.
- This requirement applies to Program information used by state and local agency staff.
- The State agency shall also ensure that all rights and responsibilities are written in a language appropriate and understood by a LEP applicant or participant.

Bilingual Requirements and Program Access

- Population data sources
  - US Census Data
    http://www.census.gov/2010census/data/
  - American Community Survey
    http://www.census.gov/acs/
  - Migration Policy Institute's National Center on Immigrant Integration Policy
    http://www.migrationpolicy.org/

    School statistics collected by the U.S Department of Education.

Equal Opportunity for Religious Organizations

- Ensures a level playing field for the participation of faith-based organizations and other community organizations in USDA programs.
- Prohibiting discrimination for or against an organization on the basis of religion, religious belief, or religious character in the administration & distribution of Federal funds;
- Allowing religious organizations that participate in USDA programs to retain its independence and continue to carryout its mission, provided that direct USDA funds do not support any inherently religious activities such as worship, religious instruction, or proselytization;

Equal Opportunity for Religious Organizations

- Clarifying that faith-based organizations can use space in their facilities to provide USDA-funded service without removing religious art, icons, scriptures, or other religious symbols; and
- Ensuring that no organization that receives direct Federal financial assistance can discriminate against a program beneficiary, or prospective beneficiary, on the basis of religion or religious beliefs.

Disability Discrimination Prohibited

- Sections 504 and 508 of the Rehabilitation Act of 1973 and USDA implementing Regulation, 7 CFR Part 15b, prohibits discrimination based on disability in programs or activities receiving Federal financial assistance.
- In addition, the Americans with Disabilities Act (ADA), 28 CFR Part 35, Title II, Subtitle A, prohibits discrimination on the basis of disability in all services, programs and activities provided to the public by State and local governments.
- These civil rights laws protect persons with disabilities if they are potential applicants or participants in any FNS funded programs.

Definition of Disability

- 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.

- Physical or mental impairment means (1) any physiological disorder or condition, cosmetic disfigurement or anatomical loss affecting any one or more of the body systems.

Definition of Disability Cont.

- To constitute a “disability” a condition must substantially limit a major life activity.
- A major life activity means functions such as caring for one’s self, performing manual tasks, walking, talking, seeing, hearing, speaking, eating, breathing, learning and working.
- Has a record of such an impairment means has a history of, or has been classified as having, a mental or physical impairment that substantially limits one or more major life activity.

Definition of Disability Food Service

- The Americans with Disabilities Act Amendments Act of 2008 (P.L. 110-325) impacts NSLP, SMP, SBP, CACFP and SFSP as it expanded the definition of “disability”.
- Major Life Activities now also include: “Major Bodily Functions”, such as“…function of the immune system**,…**digestive, bowel, bladder functions and reproductive systems”…….
- Individuals who take mitigating measures to improve or control any of the conditions recognized as a disability, are still considered to have a disability and require an accommodation.

Food Services

- In providing food services to any of its students, a recipient may not discriminate on the basis of disability;
- Recipients (SFAs) shall serve alternative/special meals at no extra charge to students whose disability restricts their diet. Recipients should require students to provide ~~a~~ medical certification from a recognized medical authority that documents a special meal is required due to a dietary disability. (7 CFR 15b.26(d))

South Dakota specifics

- See SD numbered memo “Special Diet Statements in Child Nutrition Programs (Revised)“

  CACFP-45.2 / CACFPDCH–29.2 /

  NSLP – 47.2 / SFSP – 24.2

  - It is on CANS website at http://www.doe.sd.gov/cans/ under numbered memos

- In SD, the recognized medical authority is an MD (Medical Doctor) or DO (Doctor of Osteopathy).

Disability Discrimination
Visual/Mobile Impairments

- It is imperative that websites, including state and local agency websites, and online application systems are readily accessible to and useable by persons with visual impairments and other disabilities.
- In addition, programs must ensure accessibility to the program, particularly to persons in wheelchairs or other mobility disabilities.
- At times, different or special treatment may actually be necessary in order to ensure effective aids, benefits, and services are adequate.

Disability Discrimination
Alternate Formats

- There is also an obligation to ensure that members of the public (sponsors/providers) are provided accommodations in order to access program information, applications and assistance (i.e. Braille, large print, and audio tape)

- Providing American Sign Language (ASL) interpreters for persons with hearing disabilities may be necessary to be able to adequately communicate with these applicants and participants.

Racial/Ethnic Data Collection

(1 of 5)

"…State agencies, local agencies, and other sub recipients are required to obtain data by race and ethnic category on potentially-eligible populations, applicants, and participants in their program service area…Systems for collecting actual racial and ethnic data must be established and maintained for all programs."

Racial/Ethnic Data Collection NSLP, SBP, and SMP:

DATA COLLECTION : 1 NSLP, SBP, and SMP

- The collection and reporting of data on the actual number of children applying for free and reduced-price meals or free milk, by ethnic/racial group, is required by DOJ Regulations, 28 CFR Part 42, and 9 AR.
- (a) The SFA or other program recipient agency will:
  - (1) Develop a method for data collection. Methods include determination of the information by a school official through observation, personal knowledge, or voluntary self-identification by an applicant on the free and reduced-price meal or free milk application. State agencies may also use data or information collected by other Federal and State agencies (e.g., Department of Education).
  - (2) Maintain information on file for 3 years.
  - (3) Establish procedures to ensure that the information is made available only to authorized State and Federal personnel as requested, or as part of Office of Management and Budget (OMB) approved surveys.
- .

Racial/Ethnic Data Collection

- (b) The State agency, or FNSRO where applicable, will:
  - (1) Ensure that each SFA or other program recipient agency under its jurisdiction complies with the requirements set forth in the above paragraph.
  - (2) Review and evaluate the data during the civil rights compliance phase of the monitoring and review activities required by program regulations; and identify SFAs or other program recipient agencies that need closer review to determine their compliance with the CR laws and with the requirements of this Instruction

Racial/Ethnic Data Collection

(4 of 5)

- Purpose: To determine how effectively FNS programs are reaching potentially eligible persons and beneficiaries
- As a means of monitoring civil rights compliance, state agencies shall establish a system for the collection of racial/ethnic data of each person applying for and receiving benefits.
- Applicants shall be assured that the information is required for and used for statistical purposes only and has no effect on eligibility criteria.
- The data should be collected at the point of application.

Racial/Ethnic Data Collection

(5 of 5)

- If an applicant/parent does not consent to the self-identification method, the individual taking the application will, through visual observation, determine the applicant's race or ethnicity and mark the appropriate category.
- Children are not to be surveyed.
- State and local agencies should compare their participant data with potentially eligible persons within their service areas.
- Conduct outreach as needed.

Race and Ethnic Categories – Two Question Format

1. Ethnicity
   - *Hispanic or Latino*
   - *Not Hispanic or Latino*

2. Race (one or more of the following)
   - *American Indian or Alaskan Native*
   - *Asian*
   - *Black or African American*
   - *Native Hawaiian or Other Pacific Islander*
   - *White*

Complaints of Discrimination

- All civil rights complaints shall be accepted and forwarded to the Office of the Assistant Secretary for Civil Rights. The complainant must file a complaint within 180 days of the alleged act of discrimination.
- Complaints may be written, verbal, or anonymous.
- State agencies or local agencies may develop their own complaint forms, but the use of such forms cannot be a prerequisite for acceptance of a complaint as the use of a complaint form is not required.
- FNS must investigate complaints within 90 days.

The Civil Rights Complaint Process

Complaint information should include:

- Name, address, and telephone number or other means of contacting the person alleging discrimination;
- The location and name of the organization or office that is accused of the discriminatory practices;
- The nature of the incident or action or the aspect of program administration that led the person to allege discrimination;

The Civil Rights Complaint Process

- The names, titles, and business addresses of persons who may have knowledge of the discriminatory action;
- The date(s) during which the alleged discriminatory actions occurred, or if continuing, the duration of such actions; and
- The basis for the alleged discrimination (race, color, national origin, age, sex, and or disability).

Compliance Reviews

- To examine the activities of State agencies, Local agencies, and Sub recipients.
- To determine adherence with civil rights and program requirements.
- FNS Civil Rights and Program staffs review both State and local agencies.

  Local agencies review their sub recipients holding agreements.
- State agencies must report significant findings to the reviewed entity and to FNS.

Compliance Reviews

- There are three types of compliance reviews completed by State and federal agencies:

1. Pre-Award Compliance Reviews
2. Post-Award (Routine) Compliance Reviews
3. Special Compliance Reviews

Pre-Award Compliance Reviews

- These reviews are conducted by the State Agency and are usually done as desk reviews of information provided by applicants in their official application to operate an FNS Federally-assisted program.

- No Federal funds shall be made available to a State or an institution until a Pre-Award Compliance Review has been conducted and the applicant has been determined to be in compliance with Title VI.

Post-Award Compliance Reviews

- Routine CR Compliance Reviews are a component of the FNS Management Evaluation Review process.
- Conducted jointly or independently by the CR staff
- Examine the activities of State and Local agencies/ subrecipients to determine if FNS-funded programs are being administered in accordance with civil rights requirements.
- The office performing the review must advise the reviewed entity, in writing, of the review findings and recommendations.

Post-Award Compliance Reviews

1) Review of lower-level agencies;
2) Data collection process and that records have restricted access;
3) Program requirements are applied uniformly;
4) Public notification;
5) Complaint process;
6) Training of agency personnel;
7) Nondiscrimination Statement usage;
8) Participation in State agency training of local agencies;
9) Analysis of denied applications;
10) Vendor compliance;
11) Serving students with dietary disabilities and;
12) Language assistance for Limited English proficiency students and applicants.

Post-Award Compliance Reviews

A review of materials on site will include a look at:

1) If eligible students/applicants and households have an equal opportunity to participate;
2) Display of the "And Justice for All" poster in a prominent location;
3) nondiscrimination statement inclusion on program materials such as application, notices, brochures.
4) availability of program information to eligible persons, program applicants and participants;
5) racial and ethnic data collection, and 3-year record maintenance;
6) complaint processing; and
7) Documentation of training.

Special Compliance Reviews

- A Special Compliance Review may be conducted by the USDA Office of the Assistant Secretary for Civil Rights staff and/or FNS when there are significant Civil Rights concerns which have a direct impact on the delivery of FNS program services and/or benefits.
- Statistical data indicates that a particular minority group is not participating in or benefiting from the Program to an extent indicated by the population of potentially-eligible to participate in or benefit from the Program.
- Reports of noncompliance made by other agencies need to be substantiated.
- Patterns of complaints of discrimination have developed that require follow-up.

Resolution of Noncompliance

Definition of “Noncompliance”:

A factual finding that any civil rights requirement, as provided by law, regulation, policy, instruction, or guidelines, is not being adhered to by a State agency, local agency, or other subrecipient.

Resolution of Noncompliance

- Steps must be taken immediately to obtain *voluntary* compliance; and

- Effective date of the Finding of Noncompliance is the date of notice to the State agency, local agency, or other subrecipient.

Recommendations

- During reviews, evaluate each school's current policies and practices regarding the request for a "Reasonable Accommodation".
- Ensure that schools work with the person that holds the key to the appropriate training and instructions regarding meal substitutions.
- Review all of the states Civil Rights procedures and polices to ensure compliance.

Recommendations Cont.

- During the renewal of agreements make sure that the person signing the agreement knows their obligations under Title VI of the Civil Rights Act.
- Ensure that all staff working with the program are trained to know the complaint procedures and how to assist a person in filing a complaint.
- Have sign in sheets to document all training. These will be assessed during administrative reviews. CR training also counts toward the professional standards training requirements.

The following individuals completed Civil Rights Training

- Date: _____
- SFA (agency): _____
- Individuals: _____
- _____

  _____

Certificate for Civil Rights Training
Keep this or similar documentation on file

Civil Rights Training for Child Nutrition

Based on presentation by the Civil Rights Division, USDA Food and Nutrition Service in June 2015, and November 2015 instructions/policies.

Professional Standards Training Credit print, sign, and date this certificate for your records

This training credits for 1 hour of training in
Key Area 3 – Administration 3000

Your Name:

Date of Training:

Civil Rights Training for Child Nutrition

Based on presentation by the Civil Rights Division, USDA Food and Nutrition Service in June 2015, and November 2015 instructions/policies.

This training credits for 1 hour of training in

Key Area 3 – Administration 3000, 3200 Program Management

Professional Standards Training Credit

Print Name:

Date of Training:

If you have question about this presentation, contact
Child & Adult Nutrition Services at
605-773-3413 (phone)or
doe.schoollunch@ state.sd.gov

Civil Rights Training

Can be found here: https://doe.sd.gov/cans/documents/1215-CRtr.pdf

Administrative Review Cover

Administrative Review Manual

Can be found here: http://www.doe.sd.gov/cans/documents/18-ARmanual.pdf

Administrative Review List

Can be found here: https://doe.sd.gov/cans/documents/19-Review.pdf

Administrative Review Manual

For monitoring of program requirements under the National School Lunch Program, School Breakfast Program, and other Federal school nutrition programs

U.S. Department of Agriculture
Food and Nutrition Service
School Meal Programs

Effective School Year 2017-2018

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, gender identity (including gender expression), sexual orientation, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the responsible Agency or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at http://www.ascr.usda.gov/complaint_filing_cust.html and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

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2. On-site Assessment Tool
3. Site Selection Worksheet
4. Statistical Sample Generator
5. Meal Compliance Risk Assessment Tool
6. Dietary Specifications Assessment Tool
7. Nutrient Analysis and Validation Checklist
8. Nutrient Analysis Protocols
9. Resource Management Comprehensive Review Form
10. Resource Management Risk Indicator Tool
11. Fiscal Action Workbook
12. Non-reimbursable Meal Allocation Form
13. School Data and Meal Pattern Error Form (S-1)
14. Other Meal Claim Errors (S-2)
15. Eligibility Certification and Benefit Issuance Error Worksheet (SFA-1)
16. Other Eligibility Certification and Benefit Issuance Errors Worksheet (SFA-2)
17. SFA Data Summary Form (SFA-3)
18. Special Provisions Non-Base Year and CEP Claiming Percentage/Funding Level Summary Form (SFA-1A)
19. Community Eligibility Provision ISP and Claiming Percentage Validation Worksheet (SFA-2A)
20. Seamless Summer Option School Data and Meal Pattern Error Form (SSO S-1)
21. Seamless Summer Option Eligibility Certification Form (SSO S-2)
22. Supplemental Seamless Summer Option Administrative Review Form
23. Supplemental Afterschool Snacks Administrative Review Form
24. Supplemental Special Milk Program Administrative Review Form
25. Infant and Pre-K Meal Pattern On-Site Validation Checklist

Acknowledgments

We would like to acknowledge the dedication and effort of the School Meals Administrative Review Reinvention Team and the Administrative Review Forms and Tools Workgroup, comprised of USDA and State agency staff, for their assistance in preparing this manual and the accompanying forms and tools, as well as all additional USDA and State agency staff members for their assistance.

Introduction to the Administrative Review

The Richard B. Russell National School Lunch Act, as amended by the Healthy Hunger-Free Kids Act of 2010 (HHFKA), requires a unified accountability system designed to ensure that participating school food authorities (SFAs) comply with National School Lunch Program (NSLP) and School Breakfast Program (SBP) requirements. The Act also requires an accountability system that conducts Administrative Reviews to evaluate Program requirements for NSLP and SBP during a three-year cycle.

The Administrative Review described in this manual provides a comprehensive evaluation of school meals programs by State Agencies (SAs) of SFAs participating in the NSLP and SBP, and includes both Critical and General Areas of Review. The Food and Nutrition Service (FNS) has expanded the scope of review for both the Critical and General Areas to provide for a more robust review of program operations. This includes the implementation of the HHFKA program requirements and other Federal programs. FNS provides forms, instructions, and guidance to standardize the review process.

FNS intends this process to underscore the importance of ensuring all aspects of the Administrative Review process are meaningful and address program requirements. Given the complexity of the procurement process at the SFA level and the need for ongoing technical assistance in procurement, FNS has provided a separate procurement review instrument that SAs may use to monitor SFA compliance with Federal procurement regulations and policies. State agencies are encourage to conduct procurement reviews during the same three year review cycle as the administrative review, however, they are not required to do so. State agencies have the discretion to conduct procurement reviews on an alternate cycle. The alternate cycle may be longer than the current three-year cycle requirement. The three-year review requirement at 7 CFR 210.19 (a)(5) for SFAs that contract with food service management companies, must be maintained even if the State agency has an Administrative Review waiver and is operating under a four or five-year cycle for Administrative Reviews.

SAs should note that this manual uses the term “SFA” to refer to the governing body responsible for school food service operations, and the term “LEA” (local educational agency) to refer to the governing body responsible for activities related to, but not directly under, the school food service. In addition, the terms “school” and “site” are used interchangeably to mean a physical location where Program meals are offered to children.

When program responsibilities fall to entities outside of the school food service, the SA must assess how unit(s) of the LEA or entities other than the school food service implement their responsibilities, as applicable. The most notable of these areas are the certification and benefit issuance process (Section II), Resource Management (Section IV), Smart Snacks in School, and Local Wellness Policy (Section V).

Overview of the Administrative Review Manual

The Administrative Review Manual is comprised of the following sections:

- Section I: Pre-visit Procedures
- Section II: Meal Access and Reimbursement
- Section III: Meal Pattern and Nutritional Quality
- Section IV: Resource Management
- Section V: General Program Compliance
- Section VI: Other Federal Program Reviews
- Section VII: Post-Review Procedures
- Section VIII: Fiscal Action
- Section IX: Special Provision Options
- Section X: Resources
- Authorities
- Glossary of Terms

The regulations governing the Administrative Review (7 CFR 210.18) reference two Critical Areas of performance, Performance Standard 1 and Performance Standard 2, as well as a number of General Areas of Review. These references do not signify a higher priority of one area of review over another. While the regulations use the term "Critical Areas" to describe Performance Standards 1 and 2, compliance standards in the General Areas of Review are equally important. The regulations require fiscal action for the Critical Areas and provide the framework to allow SAs to take fiscal action or withhold payments for program noncompliance in the General Areas.

In this manual, Performance Standard 1 corresponds with Section II: *Meal Access and Reimbursement*, and Performance Standard 2 corresponds with Section III: *Meal Pattern and Nutritional Quality*. Section IV: *Resource Management*, Section V: *General Program Compliance* and Section VI: *Other Federal Program Reviews* cover the General Areas of Review. Sections II through VI contain modules addressing the scope of review. Each module includes:

- Intent/Scope of Monitoring
- Review Procedures
    - Pre-visit Review Procedures
    - On-site Review Procedures
- Technical Assistance/Corrective Action
- Fiscal Action

Administrative Review Numbering System

This manual assigns each Administrative Review monitoring area a unique series of numbers (e.g., Certification and Benefit Issuance – 100s). The numbers are identified on all associated questions, forms, and related material to ensure continuity between the manual and review documents.

Number Series	Monitoring Area
Section II: Meal Access and Reimbursement (Critical Area – Performance Standard 1)	
100	Certification and Benefit Issuance
200	Verification
300	Meal Counting and Claiming
Section III: Meal Pattern and Nutritional Quality (Critical Area – Performance Standard 2)	
400	Meal Components and Quantities
500	Offer versus Serve
600	Dietary Specifications and Nutrient Analysis
Section IV: Resource Management (General Areas)	
700	Resource Management
Section V: General Program Compliance (General Areas)	
800	Civil Rights
900	SFA On-site Monitoring
1000	Local School Wellness Policy and School Meal Environment
1100	Smart Snacks in School
1200	Professional Standards
1300	Water
1400	Food Safety, Storage, and Buy American
1500	Reporting and Recordkeeping
1600	School Breakfast Program and Summer Food Service Program Outreach
Section VI: Other Federal Program Reviews (Critical and General Areas)	
1700	The NSLP Afterschool Snack Service
1800	Seamless Summer Option
1900	Fresh Fruit and Vegetable Program
2000	Special Milk Program
Section VII: Post-Review Procedures	
No related forms	
Section VIII: Fiscal Action	
Forms have separate numbering system	
Section IX: Special Provision Options	
2100	Special Provision Options

Overview of the Administrative Review Process

The Administrative Review is the SA assessment of the SFA's administration of the NSLP, SBP, and other school nutrition programs. The objectives of the Administrative Review are to:

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

Review Frequency

SAs must conduct Administrative Reviews of all SFAs participating in the NSLP and/or SBP at least once during each three-year review cycle, provided that each SFA is reviewed at least once every four years. SAs have flexibility in scheduling reviews within the review cycle since FNS does not require a yearly minimum number of Administrative Reviews. For each SA, the first three-year review cycle was School Year (SY) 2013-2014 through SY 2015-2016. The second three-year review cycle began SY 2016-2017 and will end with SY 2018-2019. FNS may, on an individual SFA basis, approve written requests for one-year extensions to the three-year review cycle if FNS determines the three-year cycle requirement conflicts with efficient SA management of the Program. (7 CFR 210.18(c))

Any SFA entering the NSLP and/or SBP at any point during the three-year review cycle must be reviewed prior to the end of the review cycle. SAs are encouraged to conduct more frequent Administrative Reviews of large SFAs and any SFAs that may benefit from a more frequent interval.

Note: SAs are required to notify FNS of scheduled Administrative Reviews, upon FNS request. (7 CFR 210.18(d)(1))

Scope of Review

General

The scope of the Administrative Review focuses on two primary review components: Critical Areas of Review and General Areas of Review. The Critical Areas of Review are Performance Standard 1 and Performance Standard 2. Performance Standard 1 focuses on the certification and benefit issuance process and the accuracy of meal counting and claiming. Performance Standard 2 focuses on whether meals claimed for reimbursement meet meal pattern and nutritional quality requirements. The General Areas of Review are Resource Management and other areas of general program compliance. Resource Management addresses the Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Non-program Foods, and Indirect Costs. General program compliance includes Civil Rights, SFA On-site Monitoring, Local School Wellness Policy, Smart Snacks in School, Professional Standards, Water, Food Safety, Storage, and Buy American, Reporting and Recordkeeping, and SBP and SFSP Outreach.

The Administrative Review Process is designed to allow the SA to conduct specified aspects of the review off-site and other aspects on-site. SAs record information in the *Off-site Assessment Tool* by collecting information available at the SA level or from the SFA. The SA may work with the SFA to answer the questions when information is needed. The *Off-site Assessment Tool* allows the SA to gain a better understanding of SFA operations prior to the on-site review, thus providing for a more robust review while decreasing the SA's on-site review time. The SA's analysis of this information informs the scope of the on-site portion of the Administrative Review. While SAs are encouraged to conduct specified aspects of the review off-site, the SA may conduct any off-site portion of the review on-site, at their discretion (with the exception of the Resource Management off-site review).

The SA's on-site portion of the Administrative Review is intended to validate the information collected on the *Off-site Assessment Tool* and provide an opportunity for the SA to observe the operation of the school nutrition programs at the SFA and in selected schools. The SA documents its findings on the *On-site Assessment Tool*. Additional space has been provided on the *On-site*

Assessment Tool to record areas requiring technical assistance and/or corrective action identified from the *Off-site Assessment Tool.* SAs are not required to document off-site findings in this manner; however, FNS recommends that SAs utilize this space to record errors documented on the Off-Site Assessment Tool in order to facilitate the completion of the Administrative Review Report.

Pre-visit Procedures and the Off-site Assessment

The first step in the Administrative Review process is to contact the Food Service Director and the SFA's Superintendent (or equivalent in a non-public SFA) or authorized representative and send a confirmation/introductory letter. The letter must advise the SFA of the upcoming review.

Next the SA should complete the *Off-site Assessment Tool* prior to the on-site portion of the Administrative Review. The completion of the *Off-site Assessment Tool* will require collaboration with SFA staff and possibly other departments within the LEA. Some of the information collected on the *Off-site Assessment Tool* can be obtained by reviewing the SFA's annual update to the permanent agreement, through calls to the SFA or other means. The data collected must be current, i.e., collected during the year scheduled for review and reflective of the current school year unless otherwise specified in this manual.

The Resource Management portion of the *Off-site Assessment Tool* must be completed prior to the SA's on-site or off-site Resource Management review. The SA is encouraged to provide and collect information for the *Off-site Assessment Tool* from each SFA as far in advance of the SFA's Resource Management review as possible to learn if the SFA must receive a comprehensive review of any Resource Management area. This helps to ensure that the SA is able to provide sufficient notice to the SFA of the Resource Management documentation that the SA will need to review either on or off-site. If the Resource Management Risk Indicator Tool is not completed off-site prior to the review of Resource Management a comprehensive review of all four Resource Management areas will take place.

For more information on pre-visit procedures, see Section I: *Pre-visit Procedures*.

Site Selection Procedures

When selecting schools for the Administrative Review, the SA must use the procedures described in Section I: *Pre-visit Procedures* under "*Site Selection Procedures*". Site selection may occur prior to or on the day of review.

On-site Review Procedures

Entrance Conference

FNS encourages SAs to begin the on-site portion of the Administrative Review by conducting an entrance conference with the relevant SFA staff (e.g., Food Service Director, Business Manager, and Superintendent). At the conference, the SA should discuss the results of the *Off-site Assessment Tool*, explain what the SA covers during the on-site review, and inform the SFA of which schools it will review. While conducting an entrance conference is not a requirement in program regulations, a formal entrance conference helps establish the tone for the review — an important step, as the Administrative Review process is intended to provide technical assistance balanced with an assessment of program compliance.

Scope of the On-site Review

To fully evaluate the SFA's compliance with all program requirements, all modules of the *On-site Assessment Tool* must be completed. This includes an examination of:

- The SFA's free and reduced price certification — from certification to benefit issuance — to ensure the SFA process complies with program requirements
- 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

Exit Conference

At the conclusion of the on-site portion of the Administrative Review, the SA must conduct an exit conference to notify SFA staff of any program findings identified, the extent of the findings, and a preliminary assessment of the actions needed to correct the findings. The SA must address appropriate deadlines for completion of corrective action.

The exit conference is an opportunity to establish an agreed-upon Corrective Action Plan that identifies the needed corrective action and the timeframes for those actions. The Corrective Action Plan must identify:

- Administrative Review finding(s)
- The corrective action(s) required
- The timeframe(s) by which the corrective action(s) must be completed
- Any documentation the SA expects the SFA to provide to demonstrate corrective action was completed

The SA should make every effort to provide the SFA with a summary of the noted compliance areas to facilitate the immediate development of corrective action.

The SA may accept documented corrective action at the time of the Administrative Review or the documented corrective action may be submitted as described below.

Administrative Review Report/Corrective Action Plan

Once the on-site portion and, if applicable, an off-site Resource Management portion of the review is complete, the SA is responsible for incorporating all of the review results into an Administrative Review Report. The SA must provide the Administrative Review Report to:

- the SFA's Superintendent (or equivalent in a non-public SFA) or authorized representative; and
- the Food Service Director.

The report must include the review findings, a Corrective Action Plan that summarizes the agreed-upon corrective actions and associated timeframes for corrective action, and any potential fiscal action.

The report must also include:

- a statement indicating that the SFA may submit a written appeal of the denial of all or part of a Claim for Reimbursement or withholding of payment, and
- instructions on how to submit the written appeal, including any required timeframes of which the SFA should be aware and the name and address of the office to which the SFA must send the appeal.

The SA should issue the Administrative Review Report within 30 calendar days of the date the exit conference was conducted. In rare situations, when an SFA is found to be significantly out of compliance with multiple program areas and/or the SA or SFA runs into extenuating circumstances, the report may take up to 60 calendar days.

The SA is responsible for ensuring that information regarding Administrative Reviews is made easily accessible to all members of the public. SAs must publicly post a summary of the Administrative Review Report for each SFA on the SA's publicly available website. A summary of the report must be posted no later than 30 days after the SA provides the final Administrative Review Report to the SFA. The SA must also make a copy of the final Administrative Review Report available to the public upon request.

Technical Assistance/Corrective Action

FNS requires that the SA provide SFAs with any needed technical assistance. The SA **must** document thoroughly any technical assistance it provides to the SFA during the pre-visit phase as well as during the off-site and on-site portions (as applicable) of the Administrative Review. This includes,

but is not limited to, any resources, policy clarifications, and formal or informal training provided to the SFA and LEA.

The SFA must provide documentation of corrective action for any Administrative Review finding(s) identified by the SA in the Corrective Action Plan. As mentioned above, documented corrective action can be provided at the time of the Administrative Review; however, it must be postmarked or submitted to the SA no later than 30 calendar days from the deadline for completion of each required corrective action. In rare situations, the SA may approve extensions of timeframes if corrective actions are expected to take longer or require follow-up with the SFA for more information.

Upon receipt of the SFA's documented corrective action, the SA should determine whether the documentation is complete and resolves the finding(s) identified. Once the SA approves corrective action, the SA should send a closure letter to the SFA closing the review within 30 calendar days of receipt of the documented corrective action.

The exit conference, Corrective Action Plan, and documented corrective action are discussed further in Section VII, *Post-Review Procedures*.

FNS does not require SAs to conduct follow-up reviews. However, SAs should consider conducting a follow-up review if the SA determines further review/intervention is needed.

Timeframes Covered by the Review

The timeframe for the Administrative Review will encompass, at a minimum, the review period and day of review as defined in this manual.

Review Period

The review period is the most recent month for which a Claim for Reimbursement was submitted, provided that it covers at least ten (10) operating days. The Claim for Reimbursement is considered submitted once it has been mailed or provided to the SA.

Day of Review

The day of review is the day(s) on which the on-site review of the individual sites selected for review occurs.

Special Circumstances

- *Early in the School Year, Prior to Claim Submission*

  Subject to FNS approval, Administrative Reviews may be conducted early in the school year, prior to the submission of a Claim for Reimbursement. However, the review period must be the prior month of operation in the current school year and include at least ten (10) operating days.

- *Multi-track Year-Round Schools*

  In multi-track year-round schools, SAs should make every effort to select the same track for both the review period and the day of review.

- *Nutrient Analysis Outside of the Review Period*

  In some cases, a nutrient analysis may need to be conducted for a week outside the review period. For example, a SFA may not have menu documentation for the weeks in the review period.

- *Resource Management*

  The Resource Management risk assessment and comprehensive review assess financial information from the most recently completed school year (Resource Management (RM) review period). In a case in which the prior school year being reviewed is not reflective of the

typical school year (e.g., a school opens in the middle of the school year or is closed for a portion of the year due to a disaster), the State agency may look at a different review period and should consult with its FNS Regional Office. The review period should be consistent throughout the review of the Resource Management section.

Follow-up Reviews

While the Administrative Review process does not require follow-up reviews, FNS strongly encourages SAs to conduct a follow-up review when they find significant and/or repeated Critical or General Area violations. If the SA conducts a follow-up review, the follow-up should occur as soon as possible after the SFA provides documented corrective action, to validate the corrective action and ensure prompt and permanent corrective action is taken.

Forms, Tools, Worksheets

FNS has developed forms, tools, and worksheets to facilitate the Administrative Review. SAs are required to use the FNS-developed Administrative Review forms.

Should an SA decide to add State-specific questions to any of the forms, the SA must first obtain approval from its respective FNS Regional Office.

Section I: Pre-visit Procedures

Intent/Scope of Monitoring

Preparing for an Administrative Review is an integral part of the overall review process, whether selecting the correct number of schools to visit, examining Claims for Reimbursement, or scheduling a time for an entrance conference.

Being prepared prior to the on-site visit allows SAs to use the time on-site more efficiently. This section provides guidance and the procedures necessary for completing the pre-visit process.

Review Procedures

Pre-visit Review Procedures

The SA must review documentation available at the SA pertaining to the SFA receiving the Administrative Review. The SA should use available information to complete the *Off-site Assessment Tool*, including:

- SFA agreement
- Free and reduced price policy statement
- Renewal applications
- Claims for Reimbursement
- Other miscellaneous reports (e.g., *Verification Collection Report*, (FNS-742)), annual SFA financial data collected by the SA, etc.)
- Review findings from prior years, Corrective Action Plans, and documented corrective action, as applicable
- Audits

Determine the school(s) that will receive an Administrative Review using the site selection procedures described under *Site Selection Procedures* (below). See the Resources Section for a prototype site selection tool.

Obtain the names of the Food Service Director and the SFA's Superintendent (or equivalent in a non-public SFA) or authorized representative, and send a confirmation/introductory letter notifying them of the upcoming Administrative Review. The letter may include a checklist of documentation that the SFA should prepare prior to the on-site visit.

Contact the SFA prior to the Administrative Review to:

- Establish the terminology used by the SFA and school personnel (e.g., names of forms used for local edit checks and claims consolidation)
- Become familiar with procedures through discussion with the SFA on systems in place for meal counting, recording, and reporting; claims consolidation; application processing; verification; and benefit issuance. Obtain any information needed to complete the *Off-site Assessment Tool*. FNS recommends that SAs begin the process of completing the *Off-site Assessment Tool* at least 4-6 weeks prior to the on-site visit.

Site Selection Procedures

NSLP Site Selection Procedures

To determine the minimum number of schools subject to review, the SA must obtain data from the SFA for all participating schools. This data must include:

- the school name
- type of school (elementary, combination, or secondary)
- which LEA the school is a part of if multiple LEAs make up the SFA
- the number of serving days
- the number of students eligible for free meals in NSLP
- the number of free meals claimed for a month in NSLP

While it is recommended that the selection occur prior to the first day of the on-site portion of the review, SAs may complete site selection after the entrance conference. SAs may use the

Administrative Review Site Selection Worksheet Template found with the Administrative Review Forms and Tools. This template is not required.

To determine the minimum number of schools to review for NSLP, use the table below. For purposes of this manual, the term "reviewed schools" refers to the schools selected for review based on these site selection procedures.

Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP	Number of Schools in the SFA	Minimum Number of Schools to Review for NSLP
1 to 5	1	41 to 60	6
6 to 10	2	61 to 80	8
11 to 20	3	81 to 100	10
21 to 40	4	101 or More	12*
* 12 plus 5 percent of the number of schools over 100. Fractions must be rounded to the nearest whole number using standard rounding procedures (i.e. if less than 5 round down, if 5 or more round up).			

All schools with a free average daily participation (ADP) of 100 or more and a free participation factor of 100 percent or more must be reviewed, with the exception of Residential Child Care Institutions (RCCI) (without day students). For SFAs that consist of more than one LEA, the SA must review at least one school from each LEA.

Selection of additional schools to meet the minimum number of schools to review must be based on the following criteria:

- Elementary schools with a free ADP of 100 or more and a free participation factor of 97 percent or more
- Combination schools with a free ADP of 100 or more and a free participation factor of 87 percent or more
- Secondary schools with a free ADP of 100 or more and a free participation factor of 77 percent or more

The following school information is needed to conduct school selection:

- names and types of all schools in the SFA participating in the NSLP;
- which LEA the school is a part of if multiple LEAs make up the SFA;
- number of serving days for each school for the month selected;
- highest number of free eligible for the month selected for each school; and
- number of free lunches claimed for the month selected.

Calculate the Free Participation

Calculate the free ADP by dividing the number free claimed by the number of serving days. Round the ADP to the nearest whole number, using standard rounding procedures (i.e. if less than 5 round down, if 5 or more round up).

Calculate the percent free participation by dividing the free ADP by the highest number of free eligible. Round to three (3) decimal places and multiply the result by 100.

Note: It is recommended that the information used in school selection be obtained for the month of October; however, any month for which a Claim for Reimbursement has been filed and which best represents each school's participation by free eligibles may be used. Record the month used for the school selection.

When the number of schools selected using the criteria described above does not meet the required number of schools to review or a school from each LEA is not selected, the SA must select additional schools using SA criteria. The SA must document the reason(s) for selecting the schools for review. SA criteria may include, in no prescribed order:

- Low participation schools
- High participation schools
- Schools that have less than 100 free ADP but greater than 100 percent free participation
- Recommendations from a food service director
- Findings from the on-site visits or the claims review process
- Any school in which the daily meal counts appear questionable

- Identical or very similar claiming patterns (e.g., identical breakfast/lunch meal counts for each day of the week)
- Large changes in the free meal counts (e.g., a significant increase/decrease in the amount of free meals reported without reason)
- Schools with a new school food service manager
- Manager or school never reviewed by SA
- New or unusual accountability system
- Proportional mix of the different counting systems employed by the SFA
- Schools with a significant number of Office of Inspector General Hotline and/or parent complaints
- Schools with alternate points of service
- Schools with a mix of age/grade groups (e.g., Pre-K-12 schools)
- Schools participating in Fresh Fruit and Vegetable Program, The NSLP Afterschool Snack Service, Seamless Summer Option, and Special Milk Program

Other Site Selection Criteria

SBP Site Selection Procedures

SAs must review the SBP at 50 percent of the schools that were selected for a NSLP review, with a minimum of one (1) school receiving an SBP review. SBP review sites are based on the number of schools selected for NSLP review operating the SBP. If 10 NSLP schools are selected for review and all 10 operate SBP, then 5 SBP schools are required to be reviewed. If SBP is only in operation in 5 schools, then 3 would be required (round up). As long as a minimum of 1 school operates SBP from the schools selected for review, no additional action is needed.

However, if none of the schools selected for review operates SBP then the SA has the discretion to replace one of the non-SBP schools with a school that does operate SBP or select an additional SBP school. If an additional school is selected, only SBP need be reviewed; no reviews of additional programs are required.

Note: If the school selected for the targeted menu review (as described in Section III: *Meal Pattern and Nutritional Quality*, Module, *Dietary Specifications and Nutrient Analysis*) operates the SBP, the SA must also include that school as one of the schools selected for a SBP review. Using the *Meal Compliance Risk Assessment Tool*, the SA must select the highest scoring site that participates in both NSLP and SBP.

Special Provision Option with Standard Meal Counting and Claiming SFAs

Some SFAs have a combination of Special Provision Option sites and standard meal counting and claiming sites. In these situations, if all of the sites selected for review are Special Provision Option sites, the SA must replace at least one Special Provision Option site with a standard meal counting and claiming site. If the SFA operates a combination of Special Provision Option sites and standard meal counting and claiming sites, and only one site must be reviewed, the SA must conduct an Administrative Review for the standard meal counting and claiming site. An abbreviated review will still be required to be conducted at each type of Special Provision Option sites. See abbreviated review procedures listed in Section IX Special Provision Options.

Certification for Performance-based Reimbursement During an Administrative Review

SAs may use Administrative Review activities to certify SFAs to receive the performance-based reimbursement. SAs must select schools for review that represent all the menu types offered in the SFA. Refer to *Addendum: Certifying a School Food Authority for Performance-Based Reimbursement During an Administrative Review*.

Other Site Selection Procedures

Review requirements for Resource Management and other Federal Programs vary. A more detailed site selection procedure for these areas is found in the corresponding modules under Section IV: *Resource Management* and Section VI: *Other Federal Program Reviews*.

Section II: Meal Access and Reimbursement

Modules contained within this Section include:

- Certification and Benefit Issuance (including eligibility determinations and the issuance of benefits)
- Verification
- Meal Counting and Claiming

Module: Certification and Benefit Issuance

Intent/Scope of Monitoring

Performance Standard 1

All free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals, respectively, and are counted, recorded, consolidated and reported through a system that consistently yields correct claims.

This Module covers the entire certification and benefit issuance process. This activity typically occurs at the SFA (district) level, but may also occur at the school level or a combination of the two levels.

The certification and benefit issuance process covers the SFA's certification of a student's eligibility for free or reduced price meals and the link to the SFA's meal counting and claiming system. The SA's examination of certification and benefit issuance is essential to ensure eligible children receive meals to which they are entitled, and that Claims for Reimbursement are valid.

Certification and benefit issuance is a Critical Area of the Administrative Review and falls under Performance Standard 1. For further information on the certification process, refer to the *Eligibility Manual for School Meals.*

Review Procedures

Pre-visit Review Procedures

The *Off-site Assessment Tool* should be completed prior to the on-site portion of the review to inform the SA about the SFA's certification and benefit issuance procedures.

Off-site Assessment Tool

The *Off-site Assessment Tool* includes a series of questions related to certification and benefit issuance. Questions 100-121 address the SFA's procedures regarding: eligibility determinations based on household applications, eligibility determinations specific to direct certification, and benefit issuance.

Supporting Documentation

Benefit issuance documents, including rosters or master lists; lists to distribute tickets, tokens, or student identification cards; and any other medium that is used by the school to identify the eligibility categories of students.

Analysis of Off-site Assessment Tool and Supporting Documentation

The SA must review the information in the *Off-site Assessment Tool* and supporting documentation to evaluate the SFA's risk for noncompliance with certification and benefit issuance requirements. This includes ensuring that the information provided mirrors the SFA's current free and reduced price policy statement.

Note: The scope of monitoring may also require the SA to assess how unit(s) of the LEA, beyond the school food service, implement their certification and benefit issuance responsibilities, as applicable.

If the SA determines the information contained in the *Off-site Assessment Tool* adequately summarizes the SFA's certification and benefit issuance process, the SA may conduct portions of the review off-site. For example, if the SFA can provide supporting materials, the SA may choose to examine the accuracy of the certification document (e.g., application, direct certification, or other categorical eligibility determinations) and the transfer of benefits to the point-of-service benefit issuance document(s) off-site. The SA should not remove original supporting documents from the SFA; however, photocopies are permissible.

In the steps below, any items not completed off-site must be completed during the on-site portion of the Administrative Review.

Step 1: Obtaining the Benefit Issuance Document

The SA must obtain the benefit issuance document(s) for each school under the jurisdiction of the SFA, not just the selected schools for the Administrative Review. The list of students may be from any day during the review period or the first day of the on-site review (if the SA elects to conduct this portion on-site). If the SFA utilizes an electronic certification and benefit issuance system, the SA should also notify the SFA that the SA will need access to all applications and certification documents for all schools within the SFA during the Administrative Review.

The benefit issuance document must:

- Contain the name and benefit status for all students certified as free or reduced price in the SFA.
- Be generated from the point-of-service system used in each of the schools. For schools that use different points-of-service at breakfast and lunch, it is NOT necessary to send duplicative lists (from both meal services). Point-of-service benefit issuance documents are those documents directly used in the meal count system to deliver the benefits to children (e.g., rosters, master lists).
- Not have duplicate names on the list – each certified student should only be listed one time.

  Note: This does not alleviate SA responsibility for assessing the SFA's procedures for managing transfers and mid-year changes in eligibility status.

To facilitate completing the Administrative Review forms, the benefit issuance document (or other documentation) should:

- Include the following:
  - school name;
  - method of certification (application, direct certification, other);
  - signature or initial of determining official and date of certification; and
  - total number of students certified for free or reduced price meals in the SFA.

- Not group students by benefit status. The student names may be listed in any order (e.g., alphabetically, by building, by ID number), but it is preferable that they are **not** grouped by benefit status.

The determining official must sign (or initial) and date each application, or sign (or initial) and date a cover sheet attached to a batch of applications. Recording this information will depend on the LEA's application method:

- The FNS prototype application may be modified to collect this information, or it can be recorded in the margins on a separate piece of paper attached to the application.
- A notation for the date of approval can be made to an electronic file.
- A computer system can capture the original date of approval, the basis for the determination (the household size and income used), and update the status of applications to account for transfers, withdrawals, benefit terminations, and other changes.

If one benefit issuance document is maintained at the SFA with the names of students certified for free or reduced price benefits, and a second benefit issuance document is used at the point-of-service to check names of students receiving meals, the SA must use the point-of-service benefit issuance document. In instances in which the benefit issuance document(s) is maintained separately for different groups of students (e.g., kindergarten students are listed on a classroom roster and the remaining grades are listed on a master list maintained by the cashier), both the classroom and master lists must be used.

The benefit issuance document(s) may be from the day of review or a day during the review period.

Step 2: Selecting Student Certifications for Review

From the point-of-service benefit issuance document(s), the SA must select the names of students certified for free and reduced price meals for review. The SA may elect to review either:

- All students certified for free and reduced price meals on the point-of-service benefit issuance documents for all schools in the SFA; or
- A statistically valid sample of all students certified for free and reduced price meals on the point-of-service benefit issuance document for all schools in the SFA.

Note: Denied applications are reviewed in Step 5 of the On-site Review Procedures below.

If the SA chooses to review a statistically valid sample of students, the SA must follow the methodology outlined below in *Statistically Valid Sampling*. Under this methodology, SAs select a statistically valid sample of students certified for free and reduced price meals from the point-of-service benefit issuance documents for all schools in the SFA. FNS encourages the SA to use a statistically valid sample as it will result in reviewing fewer students' certification and benefit issuance documents, and, if properly selected, the review will yield results representative of the certification and benefit issuance activity in the SFA.

Statistically Valid Sampling

Statistical sampling provides valid results only when the universe sampled is large and the sample is obtained using valid procedures. For this reason, SAs may not use statistical sampling in SFAs with 100 or fewer students certified for free or reduced price meal benefits. In these situations, the SA must review every student's certification and benefit issuance documentation within the SFA.

The Sample Size Chart found in the following pages provides two sets of confidence levels. The first set of numbers provides the sample size needed for a confidence level of 95 percent. The second set of numbers provides the sample size needed for a 99 percent confidence level.

The sample producing a 99 percent confidence level must be used if:

- the SFA uses a manual certification and benefit issuance system,
- the SFA uses a combination of a manual and electronic certification and benefit issuance system, or

- the SA identified potential areas of systemic errors of noncompliance based on the SFA's responses to the benefit issuance portion of the *Off-site Assessment Tool* (e.g., the system is using the wrong income eligibility guidelines).

If the SFA entirely utilizes an electronic benefit issuance and certification system and the SA did not identify any potential areas of systemic errors of noncompliance based on the SFA's responses to the benefit issuance portion of the *Off-site Assessment Tool*, the SA may select a sample based on either a 99 percent or 95 percent confidence level of accuracy.

- An **electronic** certification and benefit issuance system means that the certification of benefits (i.e., household application or direct certification) and the transfer of a student's benefits to the point-of-service document(s) are completed through a computerized system. For example, the household applications are certified through a web-based or scanned approval system and all direct certification matches are completed by the SFA with a computer match. An electronic system is limited to virtually no manual data entry by the SFA. However, updates to benefits may be made manually in the electronic system. Certification documents (i.e., household application or direct certification) and benefit issuance document(s) are kept electronically.

- A **manual** certification and benefit issuance system means that the certification of benefits (i.e., household application or direct certification) and the transfer of a student's benefits to the point-of-service document(s) are completed manually by the SFA. For example, the SFA completes the certification of benefits by manually approving the household application or direct certification matches and enters the data into their system manually. Written records of the certification documents (i.e., household application or direct certification) and benefit issuance document(s) are kept on file.
- A **combination** certification and benefit issuance system means some aspect of the SFA's certification of benefits (i.e., household application or direct certification) or the transfer of a student's benefits to the point-of-service document(s) is not entirely completed

electronically or manually. For example, the SFA accepts household applications via an electronic system but also accepts paper applications that must be certified manually or, as another example, the SFA enters the information submitted by the household on a paper application into the SFA's electronic system for certification.

Sample Size Chart

Total # of students certified for free or reduced price benefits	SAMPLE SIZE		Total # of students certified for free or reduced price benefits	SAMPLE SIZE	
	95%	99%		95%	99%
1-100	All	All	1251-1500	300	450
101-250	60%	75%	1501-1750	310	475
251-500	50%	60%	1751-2000	320	490
501-750	40%	50%	2001-3000	335	525
751-1000	270	380	3001-4000	350	560
1001-1250	290	420	4001-5000	355	580
			5000+	360	590

SAs may select the sample using statistical sampling software. Sampling software is practical when SFAs have the capability of importing the names of students from the point-of-service benefit issuance document to the SA in a format specified by the SA.

Using Sampling Software

If the SA elects to use sampling software, the SA format should reflect the following parameters:

- One consolidated list of all students certified for free and reduced price meals at all schools within the SFA;
- Student names may be provided in any order (e.g., alphabetically, by student number, or by school), but there can be no duplication of students on the list for any reason;
- School name should be a field next to the student name within the spreadsheet (to help identify/locate certification documentation for the selected students);
- No headers separating schools or benefit category (no headings at all other than first line).

Manually Selecting the Sample

FNS has developed a *Statistical Sample Generator* that allows the SA to input the total number of students certified for free or reduced price meals. The Generator will automatically calculate the sample size, the sample interval, and the random starting point for each of two sets of confidence levels (95% and 99%).

SAs may calculate the sample size, the sample interval, and the random starting point manually following the instructions below. Using the Sample Size Chart (above) and the following procedures:

A. Total # of students certified for benefits (*Universe*)	**B. Sample Size** (*from table above*)	**C. Sample Interval** (*A / B*)	**D. Random Starting Point** (*First Student*)

A. Enter the total number of students approved for free or reduced price meal benefits from the point-of-service benefit issuance document in Column A. This is the combined total for all free and reduced price eligible students at all schools within the SFA.

B. Use the instructions and Sample Size Chart (above) to determine the sample size that must be obtained and record in Column B.

C. Divide A by B to determine the sampling interval (C). For determining your sampling interval, round all fractions down to the nearest whole number (e.g., 3.99 = 3), except when less than 1, then round up to 1. This procedure does not follow standard rounding procedures and is used to ensure that the appropriate number of students will be selected.

D. Denote the random starting point the SA will use when beginning the selection of students from the point-of-service benefit issuance document(s).

A manual approach to identifying a random starting point follows:

1. Write down, on pieces of paper, the numbers in the sample interval (Column C above), beginning with the number one (1).
2. Put the pieces of paper in a container and mix the container.
3. Select one piece of paper; the number on the paper represents the random starting point. Record the selected number in Column D of the chart above.
4. Use the sample interval from Column C above and select subsequent students.
    - For example: If the start point (or Column D) is five and the interval (or Column C) is ten,, begin with the fifth student from the point-of-service benefit issuance document for students certified for free and reduced price meals. Select.S subsequent students at intervals of ten, for example: 5, 15, 25, 35, etc.
5. Once all of the students have been selected, compare the number of students selected to the appropriate sample size using the Sample Size Chart (above or Column B) to ensure the required number of students was selected in the sample.

Step 3: Obtaining Certification Documents

Once the names of the students subject to review have been identified, the SA must obtain the following documents from the SFA for each student under review:

- The certification document (i.e., household application or direct certification) to determine whether or not the document was correctly certified; and
- Any verification conducted for the selected student, if applicable, including whether or not the verification was properly conducted.

The SA will use this documentation to complete the On-site Review Procedures described in Step 2 below.

On-site Review Procedures

The on-site portion of the Administrative Review consists of the SA conducting interviews with SFA staff, reviewing certification and verification documents, and determining whether the SFA is in compliance with all certification and benefit issuance requirements.

On-site Assessment Tool

The *On-site Assessment* Tool includes questions pertinent to this Module; see Questions 124-142 (Certification and Benefit Issuance).

On-site Procedures

The SA must follow the steps below:

Step 1: Validating the SFA's Procedures using the Off-site Assessment Tool

The SA must determine whether the information in the *Off-site Assessment Tool* is current and accurately represents the SFA's practices for issuing benefits. The SA must also determine whether the SFA-provided information is satisfactory and reflects current practice.

To assess the SFA's **procedures for processing applications**, the SA must ensure the SFA is in compliance with 7 CFR 245.6(a). Areas of review include, but are not limited to: the use of proper income conversion factors and income guidelines; the carryover of prior year eligibility; compliance with required timeframes for household notification(s); and compliance with the independent review of applications, if applicable.

To assess the SFA's **procedures for direct certification**, the SA must ensure the SFA is in compliance with 7 CFR 245.6(b). Areas of review include, but are not limited to: whether the direct certification list came from the appropriate agency and contained all required elements; and whether direct certification was performed the appropriate number of times.

Additional information on household applications and direct certification is found in the *Eligibility Manual for School Meals.*

Step 2: Validating Student Certifications

Household Applications

For each student selected for review, the SA must examine the following:

- The eligibility determination (by reviewing the free and reduced price application), or other categorical eligibility determinations to ensure the SFA certification was completed properly.
- If annual income is reported on the household application, that the SFA has contacted the household to ensure the reporting of annual income is consistent with the *Special Situations* listed in the *Eligibility Manual for School Meals*.
- Documentation to establish whether households were notified of benefit eligibility, in accordance with regulatory timeframes.
- Any verification activity related to the selected student to ensure the verification was properly conducted and any changes in the eligibility status were properly made.

  Note: The SA should make note of any student verified since this student verification may count towards the sample of verified applications required under the Module: *Verification*.

- Documentation to establish whether households were notified of changes in eligibility status due to verification within required timeframes.

All errors relating to the students selected for review are recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet,* Form SFA-1. Any other students listed on an erroneous household application should be listed on the SFA-2, *Other Eligibility Certification and Benefit Issuance Errors Worksheet*. These errors include:

- *Errors Due to Missing Information on Free and Reduced Price Applications* — Missing:
  - Signature of an adult household member
  - Last four digits of a required social security number (Note: Applications that indicate

"none" for the adult household member are not considered an error)

- Names of all household members, including children who are requesting benefits
- SNAP, TANF, or FDPIR case number for each child, as applicable.

Note: Effective SY 2015-2016, applications must still request that applicants write a zero when there is no income to report, but failure of an applicant to indicate no income will no longer be considered missing information on free and reduced price applications.

Applications must include a clear and easy to understand instruction that communicates to applicants that *any income field left blank is a positive indication of no income* and certifies that there is no income to report. As such, applications with blank income fields should be processed by the school district as complete as long as required information is provided on the application. However, should local officials have known or available information that the household has intentionally misreported its income, they must verify any such application for cause.

- *Errors Due to Verification* — the SFA incorrectly changed eligibility status as a result of verification.

Direct Certifications

For each student reviewed, the SA must ensure the student is on the direct certification list. Direct certification errors are recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet*, Form SFA-1.

Step 3: Recording Eligibility Status

For each student reviewed and found to be in error, the SA must record the student's correct eligibility status. The correct eligibility status is recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet*, Form SFA-1. In addition, the SA will record both the SFA count of

reviewed students and the SA count of reviewed students on the SFA-1.

Note: Reviewed students are students selected for review. An example: the SA selected a sample of 450 student certifications for review. The SFA's determinations for those 450 students were 377 free and 73 reduced price eligible. The SA's validated determinations of the sample of students were 371 free and 72 reduced price eligible. The reviewer will enter the results of the certification and benefit issuance review on the SFA-1 and then transfer the totals to the SFA-3 Sections 4D and 4 E. These are the numbers that will be entered into the *Fiscal Action Workbook.*

Step 4: Validating the Benefit Issuance Document

For each student selected for review, the SA must validate the point-of-service benefit issuance document to ensure the student's eligibility was properly transferred and updated, if needed, to the document.

- *Errors Resulting from Benefit Issuance* — Applications that contain all required information, but have been approved for the wrong benefit level on the benefit issuance document, are benefit issuance errors. For example:
  - Student incorrectly listed on the benefit issuance document; or
  - Student on the benefit issuance document without a current application or direct certification documentation on file.

- Benefit issuance errors can lead to:
  - Meals claimed as free that should be claimed at the reduced price
  - Meals claimed as free that should be paid
  - Meals claimed as reduced price that should be claimed free
  - Meals claimed as reduced price that should be paid
  - Meals claimed as paid that should be free or reduced price

All errors relating to the students selected for review are recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet,* Form SFA-1. Any other students listed on an erroneous household

application should be listed on the SFA-2, *Other Eligibility Certification and Benefit Issuance Errors Worksheet.*

SAs must also determine whether free and reduced price benefits are provided to students in a manner that assures confidentiality and prevents overt identification during meal service or at any other time, in accordance with FNS Memorandum SP 45-2012, *Preventing Overt Identification of Children Certified for Free or Reduced Price School Meals, (*see FNS PartnerWeb for the most up to date policy memorandums). Any problems should be recorded in the comment section for Question 136 on the *On-site Assessment Tool.*

Step 5: Reviewing Denied Applications

The SA must review at least 10 denied applications on file for all schools under the SFA. If there are 10 or less denied applications on file the SA must review all denied applications.

The SA must determine whether denied households were notified of:

- Reason for denial of benefits
- Right to appeal
- Instructions on how to appeal
- Instructions on how to re-apply for free and reduced price benefits at any time during the school year

Denied applications found to be denied incorrectly must be recorded on *Other Eligibility Certification and Benefit Issuance Errors Worksheet,* SFA-2. These errors will not be included when calculating fiscal action. If 20 percent or more of the reviewed denied applications are denied incorrectly, as part of the required corrective action, the SFA must re-examine their initial determination of ALL denied applications. The results of the re-examination must be provided to the SA in the SFA's response of documented corrective action. For any benefit issuance changes in the SFA's re-examination of denied applications, the SFA — by the deadline in the Corrective Action Plan — must provide the SA:

- the student's name;
- the updated benefit issuance category (i.e., free, reduced price); and
- the date corrective action was applied.

Step 6: Independent Review of Applications

All errors relating to the students selected for review are recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet,* Form SFA-1. The SA will record the total number of reviewed students in error and the total number of reviewed students in Block C of the SFA-1. The SA will then divide the number of reviewed students in error by the total number of reviewed students. The number is then multiplied by 100 to determine the percentage of students in error. If the SFA's percentage in error is 10% or more; the SFA will be required to conduct an Independent Review of Applications during the subsequent school year.

Special Considerations

Under certain circumstances, the SA may follow a different review process for this Module than is detailed above. These variations include:

- *Residential Child Care Institutions (RCCIs)*

  Depending on the circumstances, an RCCI may have children residing or not residing at their institution.

  For children residing in RCCIs, the institution may document the children's eligibility using free and reduced price applications or by completing an eligibility documentation sheet for all children residing in the RCCI. The SA must examine the RCCI's documentation sheet or other certification documentation (e.g., household application). If a documentation sheet is used, it must include information indicating the child's name and personal income received by the child, the child's date of birth, date of admission, and date of release. The documentation sheet must be signed by an appropriate official and provide the official's title and contact information.

Children attending but not residing (i.e., day students) in an RCCI are considered members of their household and their eligibility is determined using a household application or through direct certification. For RCCIs with day students, the SA must follow the review process for this Module. Refer to the *Eligibility Manual for School Meals* for more information.

- *Provision 1, Provision 2, Provision 3, and the Community Eligibility Provision*
  SAs must follow the Administrative Review procedures specified in Section IX when reviewing SFAs with Provision 1, 2, or 3 schools that are establishing their base year. Additional procedures are required when reviewing Provisions 1, 2, and 3 in their non-base years and when reviewing schools participating in the Community Eligibility Provision. Refer to Section IX, *Special Provision Options* for more information.

Technical Assistance/Corrective Action

The SA must require corrective action and provide technical assistance for all benefit issuance areas resulting in errors, as described above. Corrective action must be applied system-wide for benefit issuance and certification errors, including at non-reviewed schools, if applicable.

The SA should discuss the SFA's annual training, provide the SFA with examples of different benefit issuance methods and point-of-service systems, and work with the SFA to set up a system to track changes on the benefit issuance document(s), as appropriate.

When the SFA has not properly followed up on the reporting of annual income on household applications, the SA must require the SFA to contact the household and ensure the reporting of annual income is consistent with the *Special Situations* listed in the *Eligibility Manual for School Meals*. If the follow-up results in the household having no change to the benefit issuance determination these errors will not be recorded on the SFA-1 or SFA-2 and no fiscal action is

required. However, if the follow-up results in a reduction in benefits for either the reviewed student or other household members, the reviewed student would be recorded on the SFA-1 and any other household member would be recorded on the SFA-2.

Any technical assistance provided to the SFA must be documented in the comments section of the *On-site Assessment Tool*.

Fiscal Action

Fiscal action is taken for errors resulting from the following:

- Applications with missing information as these applications are considered incomplete. This does not include applications that do not report zero income (either with a "0" or checked the "no income" box).*
- Miscategorized certifications
- Benefit issuance errors
- Failure to update a change in status resulting from verification

* Effective SY 2015-2016, applications must still request that applicants write a zero when there is no income to report, but failure of an applicant to indicate no income will no longer be considered missing information on free and reduced price applications.

Applications must include a clear and easy to understand instruction that communicates to applicants that *any income field left blank is a positive indication of no income* and certifies that there is no income to report. As such, applications with blank income fields should be processed by the school district as complete as long as required information is provided on the application. However, should local officials have known or available information that the household has intentionally misreported its income, they must verify any such application for cause.

In the case of applications missing the last four digits of the Social Security number (or an indication there is "none") or missing the signature of an adult household member, the SA is not required to

take fiscal action if corrective action occurs within the specified timeframe. If these types of errors are not corrected within the specified timeframe, then the SA must take fiscal action for those errors.

Consistent with 7 CFR 210.18(l)(1) fiscal action, when part of corrective action, is applied SFA-wide. This is because the certification and benefit issuance review assesses compliance at the SFA level and not just at the reviewed schools. This ensures program integrity by assessing fiscal action for certification errors at all sites, as well as for systemic errors within the entire SFA. The memorandum *Additional Guidance for the Implementation of the Administrative Reviews in School Nutrition Programs Final Rule* (SP 56-2016) outlines the different ways that the State agencies can use the Administrative Review Fiscal Action Workbook to assess fiscal action SFA-wide. FNS has allowed State agencies flexibility in their approach to system-wide fiscal action. Information related to fiscal action and the flexibility offered is found in Section VIII, Fiscal Action, of this manual.

The *Eligibility Certification and Benefit Issuance Error Worksheet*, Form SFA-1 captures the errors and identifies the correct eligibility status for each reviewed student. Any other students listed on an erroneous household application should be listed on the SFA-2, *Other Eligibility Certification and Benefit Issuance Errors Worksheet*.

Information related to fiscal action is found in Section VIII, *Fiscal Action*, of this manual.

Base Year Review of Special Provision 2 and 3:

SAs are required to conduct a base year certification and benefit issuance documentation review for any SFA that is requesting approval to participate in the NSLP or SBP using Provision 2 or 3, or for any sites that do not have documentation showing that a SA reviewed base year certification documents prior to SYSY2013-2014. If the SFA is scheduled for an Administrative Review during that year the SA must use the Administrative Review to ensure the accuracy of the base year certifications.

Since base year claims form the basis of subsequent year claiming, it is essential that base year certifications, meal counts, and funding levels are accurate.

When conducting a base year review of a site, any errors to the original base year percentages or funding levels for free, reduced price, and paid reimbursements, must be corrected using the Base Year Adjustment Calculation (described below). This calculation is applied to all closed Claims for Reimbursement going back to the beginning of the school year. While the base year review may be conducted in conjunction with the Administrative Review, the base year review corrects previous SFA/site meal counts. The $600 disregard does not apply to closed claims for sites in the base year when fiscal action is required to fix the meal counts.

When the base year review does not occur in the year that the base year claiming percentages or funding levels are established and errors are identified, the SA should work with its FNS Regional Office to determine how to proceed with fiscal action.

After the base year review, the SFA uses the corrected certifications and benefit issuance information in order to determine Claims for Reimbursement in future months.

Base Year Adjustment Calculation

The Base Year Adjustment Calculation is determined by taking the SFA's original count of students in the corresponding category (free, reduced-price, paid) and subtracting the SA's corrected count in each corresponding category. This will provide the SA with the number of errors that are used to complete the fiscal action process. The number of errors in each category are then multiplied by the serving days in the corresponding month that the Claim for Reimbursement is being corrected. This number is then multiplied by the ADP by benefit level (free, reduced price, and paid). This process is completed manually and then transferred into the NSLP Standard and/or SBP Standard tabs of the Fiscal Action Workbook.

**Note that ADP is calculated at the SFA or Site Level and should come from the most recent closed claim for reimbursement, or from a claim period that is the most accurate reflection of the actual ADP for the SFA/Site. However, if SA reviewers encounter difficulty in identifying the current ADP, they should contact their Regional Office for further guidance.

Example:

The example outlined below demonstrates the steps taken when the SA has found errors in free, reduced price and paid meals during a base year review. The SA proceeds to correct each closed Claim for Reimbursement to ensure that base year percentages and funding levels are corrected.

Correcting Free Certification Errors

SFAs original count of free certifications is 200

SAs corrected free certifications count is 190

Number of free errors equals 200-190= 10

15 Serving days in the month (in this example September is being corrected)*

Free ADP – 85%

Base Year Adjustment Calculation would be the number of free errors (10) multiplied by the number of serving days (15) multiplied by the ADP factor (0.85) which equals 127.5 free meals (if not a whole number round down, which is not standard rounding procedures).

127 meals is the number of free meals that is subtracted from the SFAs closed Claim for Reimbursement for the month of September. This corrected number would be used in non-base years for free meals for September.

Next the SA will proceed to correct the reduced priced errors.

Correcting Reduced Price Certifications Errors

SFA's original count of reduced price certifications is 250

SA's corrected reduced price certifications count is 225

Number of reduced price certifications errors equals 250-225= 25

15 Serving days in the month (in this example September is being corrected)*

Reduced-Price ADP – 85%

Base Year Adjustment Calculation would be the number of reduced-price errors (25) multiplied by number of serving days (15) multiplied by the ADP factor (0.85) which equals 318.75 reduced price meals (if not a whole number round down, which is not standard rounding procedures).

318 meals is the number of reduced price meals that is subtracted from the SFAs closed Claim for Reimbursements for the month of September. This corrected number would be used in non-base years for reduced price meals for September.

Next the SA will proceed to correct the free errors.

Correcting Paid Errors

SFA's original count of paid is 400.

SA's corrected paid count is 395.

Number of paid errors equals 400-395 = 5.

15 Serving days in the month (in this example September is being corrected)*

Paid ADP – 45%

Base Year Adjustment Calculation would be the number of paid errors (5) multiplied by the number of serving days (15) multiplied by the ADP factor (0.45) which equals 33.75 paid meals (if not a whole number round down, which is not standard rounding procedures).

33 meals is the number of paid meals that is subtracted from the SFAs Closed Claim for Reimbursements for the month of September. This corrected number would be used in non-base years for paid meals for September.

*The SA would use the Base Year Adjustment Calculation for each month that a Closed Claim for Reimbursement will need to be corrected. The SA must use the number of serving days that corresponds with the month that is being corrected.

Module: Verification

Intent/Scope of Monitoring

Verification is a process used by SFAs to confirm selected students' eligibility for free and reduced price meals in the NSLP and SBP. Verification is only required for a sample of students whose eligibility is certified using a household application submitted with income information or a case number for the Supplemental Nutrition Assistance Program (SNAP), Food Distribution Program on Indian Reservations (FDPIR), or Temporary Assistance for Needy Families (TANF). Students certified for free meal benefits via direct certification through documented participation in an eligible Assistance Program or through a documented Other Source Categorical Eligibility designation are not subject to verification.

The goal of this Module is to ensure the SFA properly implements the verification process as part of the free and reduced price eligibility requirements. The SA must determine if the SFA is implementing the verification process in accordance with Federal regulations (7 CFR 245.6a).

This Module is considered a General Area of Review. However, the scope of review is closely aligned with benefit issuance and, for this reason, is included in the scope of review for Section II, *Meal Access and Reimbursement*.

Review Procedures

Pre-visit Review Procedures

The Verification section of the *Off-site Assessment Tool* is completed prior to the on-site portion of the Administrative Review. The information from the *Off-site Assessment Tool* will assist the SA in identifying the SFA's verification process, as well as identifying any potential areas of

noncompliance or technical assistance needs in advance of the on-site portion of the Administrative Review.

Off-site Assessment Tool

The *Off-site Assessment Tool* has a series of questions related to verification. Questions 200-204 explore whether the SFA met all verification requirements, e.g., the SFA's submission of the *Verification Collection Report* (FNS-742), and/or notification of verification procedures.

Note: Verification materials must be at the SFA's central office for the on-site portion of the review for further examination of the materials.

Analysis of Off-site Assessment Tool

The SA must examine the *Off-site Assessment Tool* to ensure that the SFA is conducting verification in line with requirements outlined in 7 CFR 245.6a. The *Off-site Assessment Tool* provides a complete overview of the SFA's verification process, and the SA should be able to conclude that the SFA:

- Selected the correct verification sample size
- Conducted verification appropriately (including verification for cause, if applicable)
- Completed the *Verification Collection Report* (FNS-742) correctly and in a timely manner
- Appropriately identified a verification official and confirming official, if applicable
- Meets FNS regulatory requirements
- If applicable, has an electronic system that accurately pulls the correct verification sample size and application type

On-site Review Procedures

The on-site portion of the Administrative Review consists of the SA interviewing SFA staff and determining whether the SFA is in compliance with all verification requirements. It is essential that, through observation and interviews with SFA staff, the SA is able to validate the information gathered in the *Off-site Assessment Tool*.

On-site Assessment Tool

The *On-site Assessment Tool* includes Questions 207-215, which focus on the SFA's *Verification Collection Report* (FNS-742) data submission and the SFA's verification procedures, including confirmation reviews, notification requirements, and procedures to effect changes to eligibility status.

On-site Procedures

The SA must follow the steps below:

Step 1: Validating the Off-site Assessment Tool

The SA must validate the information on the *Off-site Assessment Tool*, confirming the information is still current and represents the SFA's practices for verification according to regulations. The SA also must determine the SFA-provided information is satisfactory. If the SA chooses not to complete the *Off-site Assessment Tool* prior to the on-site portion of the Administrative Review, the SA must obtain the information from the SFA while on-site.

Step 2: Determining Compliance with Verification Requirements

The SA must request that the SFA gather all verified applications for the current school year into one central location for review by the SA. If the SFA has an electronic system for collecting verification, the SA must obtain either access to the system or printed copies of all verification materials.

Based on the information compiled during the *Off-site Assessment Tool* and interviews with the appropriate staff, the SA must confirm whether the SFA:

- Verified the same number of applications as reported on the most recent *Verification Collection Report* (FNS-742), as confirmed on-site
- Verified the required number of free and reduced price applications, i.e., 3% or 1.5% of the approved applications on file as of October 1 annually, as required by 7 CFR 245.6a

- Selected the correct number of applications based on the calculated sample size
- Replaced no more than five (5) percent of the applications selected and confirmed for verification based on knowledge that the household would be unable to satisfactorily respond to the verification request

The verification process has specific required timeframes that must be followed by the SFA in order to be in compliance with FNS regulations. The verification timeframes may require the SA to review the previous school year's verification materials in order to assess the SFA's verification process for the Administrative Review. For example, if a SA chooses to conduct an Administrative Review during the month of October, the SFA's verification process will not yet be complete for the current school year and the SA must review the previous school year's verification process.

Below is a chart that provides details on how the SA must review verification if the verification process is either not complete or partially complete at the time of the Administrative Review.

Review is Scheduled For… *(All timeframes should be adjusted to State timelines and reporting requirements)*	**How to Complete Verification Review**
A timeframe prior to the completion of verification and the submission of the Verification Collection Report (FNS 742) for the current school year.	• Use previous year's Verification Collection Report (FNS 742) • Use previous year's verified applications. • Verified students selected in the Benefit Issuance sample will not count toward the verification review requirements (i.e., 10% sample of verified applications).
*A timeframe that falls **before** the Verification Collection Report (FNS 742) for the current school year has been submitted to the SASA but after verification has been completed by the SFA.*	• Use previous year's Verification Collection Report (FNS 742) • Count verified applications from previous school year to validate previous year's Verification Collection Report (FNS 742). • Use current year verified applications for review. Verified students selected in the Benefit Issuance sample can count toward the verification review requirements. (i.e., 10% sample of verified applications).
A timeframe after the current school year Verification Collection Report (FNS 742) has been submitted.	• Use current school year's Verification Collection Report (FNS 742) (i.e., 10% sample of verified applications). • Use current year verified applications for review. Verified students selected in the Benefit Issuance sample can count toward the verification review requirements (i.e., 10% sample of verified applications).

Step 3: Selecting Verified Applications for Additional Evaluation

The SA must randomly select 10 percent of the verified applications. This sample of verified applications must be examined to ensure that the entire verification process was completed according to FNS requirements.

In order to select a sample of 10 percent of verified applications, the SA must use the following guidelines:

- If the total number of verified applications on file at the SFA is fewer than 3 applications, then the SA must review **ALL** available verified applications.
  - For example, if the SFA has 2 applications on file, the SFA must review both verified applications.
- A minimum of 3 verified applications must be reviewed, so if the total number of verified applications is 30 or less, the SA must select 3 applications to review.
  - For example, if the SFA has a total of 5 verified applications, the SA must select 3 verified applications.
- In order for the SA not to spend an inordinate amount of time reviewing verification, a maximum of 30 verified applications will be reviewed. So, if the total number of verified applications exceeds 300, the SA will select 30 verified applications to review.
- For example, if the SFA has a total of 350 verified applications, the SA would select 30 verified applications to review, not the full 10% (or 35) of verified applications.

The SA must use the chart below to determine the appropriate number of verified applications to select for review at the SFA:

Number of Verified Applications on File at the SFA:	Number of Verified Applications Required for Review*
1-2	All
3-30	3 applications
31-300	10% of applications
301 or more	30 applications
*Use standard rounding procedures to the nearest whole number (i.e. less than 5 round down, more than 5 round up) to determine the required number of verified applications to review.	

Using the selected verified applications, the SA must verify compliance with the following:

- Did the SFA appropriately conduct confirmation reviews or does the SFA have a software program appropriate for fulfilling this requirement?
- Did the SFA's verification notification letter meet all Federal requirements?
- Did the SFA appropriately attempt to follow-up with unresponsive households selected for verification?
- Did the SFA's notice of adverse action contain all required information?
- Were changes in eligibility status due to verification made within prescribed timeframes?
- Did the SFA complete the verification process by November 15 or request and receive an extension until December 15 from the SA?
- Were applications selected for verification verified correctly, and was the resulting eligibility status determined accurately?

If the SA determines that the SFA accurately completed the verification process, the verification portion of the review is complete. If the SA finds errors, the SA must provide technical assistance and require corrective action for those findings. If the SA finds errors in the verification sample and cannot be sure that eligibility determinations were made appropriately, the SA may choose to expand the sample of verified applications.

Note: If the sample of students selected for review from the Module: *Certification and Benefit Issuance* contains a student(s) with a verified household application on file, the review of the verified application will contribute toward the 10 percent sample of verified applications under this Module. Refer to the Module: *Certification and Benefit Issuance* for more information.

Step 4: Recording Findings

All review findings are recorded on Questions 207-215 of the *On-site Assessment Tool* and the *Other Eligibility Certification and Benefit Issuance Errors Worksheet,* SFA-2.

Note: Do not record errors for students who were selected for verification review under Module: *Certification and Benefit Issuance* on the SFA-2. These errors must be recorded on the *Eligibility Certification and Benefit Issuance Error Worksheet,* Form SFA-1.

Technical Assistance/Corrective Action

SAs must require corrective action and provide technical assistance for areas of verification resulting in errors.

Identified errors related to issues in the SFA's verification process cited during the pre-visit or on-site portions of the Administrative Review will require the SFA to take corrective action. Corrective actions may include:

- Changing the benefit status of students on any applications verified under this Module that results in a change in application status. The SFA must notify the household and follow all required procedures;
- Requiring the SFA to attend SA verification training;
- Developing a technical assistance check-in plan with the SA annually to improve verification comprehension through email/phone discussions for relevant verification deadlines.

Any technical assistance provided to the SFA must be recorded in the comments section of the *On-site Assessment Tool*. During the process of evaluating the SFA's compliance with verification requirements, some considerations for technical assistance may include:

- Assisting the SFA in understanding how to select the correct verification sample size;
- Sending the SFA reminders about when verification reports are due to the SA;
- Providing new SFA staff with additional support and training on verification and/or
- Discussing and encouraging SFA participation in verification training offered by the SA.

If a SA finds that a SFA systemically has difficulty with verification reporting, the SA must explore why the problem exists and consider requiring mandatory participation in SA verification training.

Fiscal Action

This is a General Area, thus fiscal action is not required. Fiscal action is applied for those students reviewed under the Module: *Certification and Benefit Issuance* in cases where certification or changes in benefit status was in error as a result of verification. Refer to the Module: *Certification and Benefit Issuance* in this Section for more information.

FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. Withholding program payments is not included in the specific regulatory definition for fiscal action. For additional information, please refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Meal Counting and Claiming

Intent/Scope of Monitoring

The SFA must have a meal counting and claiming system that accurately counts, records, consolidates, and reports the number of reimbursable meals claimed, by category (i.e., free, reduced price, or paid). The meal counting and claiming process must include a mechanism, whether manual or electronic, for counting meals and consolidating meal totals at each school within the SFA. The mechanism must include an internal control system that validates the total meal counts prior to the submission of the Claim for Reimbursement to the SA.

Performance Standard 1

All free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals, respectively, **and are counted, recorded, consolidated, and reported through a system that consistently yields correct claims**.

The goal for monitoring meal counting and claiming is to assure the processes the SFA uses to count, consolidate, and claim meals for the SBP and NSLP are in compliance with Program requirements. For example:

- Counting and claiming system(s) in use for the SBP and NSLP provide accurate counts of reimbursable meals, by category
- Reimbursable meals are correctly counted, consolidated, and recorded at each school and at the SFA
- Counting and claiming system yields an accurate Claim for Reimbursement

This module also covers the requirement of SFAs to have a local meal charge policy. **As of July 1, 2017**, all SFAs operating the NSLP and/or SBP must have in place a written local meal charge policy to address situations when children participating at the reduced price or paid rate do not have funds to pay for their meal at the time of the meal service. The policy must be communicated to all households with children attending the SFA and all school or SFA-level

staff members responsible for the local meal charge policy's enforcement. State agencies and SFAs retain the authority to establish the specifics of their policies based on local conditions. For additional information, see *Unpaid Meal Charges: Local Charge Policy Requirement (*SP 46-2016) and *Unpaid Meal Charges: Guidance and Q&A (*SP 23-2017).

The requirement to have a local meal charge policy falls under the General Areas of the Administrative Review.

Review Procedures

This Module examines the process the SFA uses to count, consolidate, and report a Claim for Reimbursement of meals provided to eligible students. This Module will focus on the day of review and review period at the school and SFA levels for the SBP and NSLP.

Pre-visit Review Procedures

The *Off-site Assessment Tool* will help the SA identify the steps in the SFA's meal counting and claiming process and identify any potential areas of noncompliance or technical assistance needs prior to the on-site portion of the Administrative Review.

Off-site Assessment Tool

The *Off-site Assessment Tool* has a series of questions related to meal counting and claiming. Questions 301-311 address standard meal counting and claiming procedures, including internal controls and training.

Analysis of Off-site Assessment Tool and Supporting Documentation

The *Off-site Assessment Tool* will provide the SA with an understanding of how the SFA counts and claims meals on a daily basis. The information gathered in the *Off-site Assessment Tool* for meal counting and claiming will provide the SA with an understanding of the SFA's:

- Meal counting and claiming system and whether their system is electronic or manual

- Point-of-service system
- Back-up system for counting and claiming reimbursable meals served
- Training provided to staff on meal counting and claiming procedures
- Standard operating procedures for meal counting and claiming system
- Procedures for consolidation of the meal counts for the Claim for Reimbursement
- SAs are expected to assess the local meal charge policy requirement compliance off-site through the *Off-site Assessment Tool*. SAs are expected to:
    - Review a copy of the SFA's current local meal charge policy
    - Review documentation demonstrating the local meal charge policy was communicated to all households at the start of the school year, and to all households that transfer into the SFA during the school year
    - Review documentation demonstrating the local meal charge policy was communicated to all school or SFA-level staff responsible for policy enforcement.

Note: SAs are not responsible for evaluating the content or quality of the SFA's local meal charge policy. The SA is only responsible for confirming that the SFA has a written charge policy in place, and that the SFA meets the policy communication requirements outlined above. FNS will assist SFAs in the transition to meeting this new requirement by focusing on technical assistance during the Administrative Review during the first year that the local meal charge policy requirements are in place.

On-site Review Procedures

The SA's on-site portion of the Administrative Review consists of conducting interviews with SFA staff, observing the meal service, examining documentation that supports the Claim for Reimbursement, and determining whether the school and SFA procedures yield an accurate Claim for Reimbursement and are in compliance with all Federal meal counting and claiming requirements. Documentation to support the Claim for Reimbursement includes internal edit checks and (as necessary) signed documentation from a State licensed healthcare professional to support meal modifications for children with disabilities, when the modified meal does not

meet the Program meal pattern. See the Memorandum, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs (*SP 59-2016) for more information.

The on-site portion of the Administrative Review examines both the day of review and the review period at the school and SFA levels for the SBP and NSLP.

On-site Assessment Tool

Questions 314-316 (SFA level), 317-321 (school level, day of review), and 322-325 (school level, review period) in the *On-site Assessment Tool* assess the validity of the reviewed school(s) and the SFA's meal counts for the day of review and the review period.

On-site Procedures

The SA must follow the steps below:

Step 1: Validating the Off-site Assessment Tool

The SA must validate that the information on the *Off-site Assessment Tool* is current and represents the SFA's practices for implementing meal counting and claiming requirements according to regulations. The SA must also determine whether the SFA's responses were satisfactory.

If the SA does not complete the *Off-site Assessment Tool* prior to the on-site portion of the Administrative Review, the SA must obtain the information from the SFA while on-site.

Step 2: Validating the Counting and Claiming Process

The SA must review the procedures for SBP and NSLP at the school and SFA level for both the day of review and the review period.

For the **school level** review, the SA must:

- interview staff to determine whether the meal counting, consolidation, and claiming procedures at the school level reflect the SFA's procedures (this interview should preferably occur before meal service begins so SA is aware of procedures while observing the meal service);
- observe meal service at the point-of-service to ensure the counting system yields an accurate count of reimbursable meals on the day of review and whether the meal counting system prevents overt identification of students receiving free and reduced price benefits;
- review the meal count documentation on the day of review to ensure the meal counts are counted, consolidated, and recorded for SFA's use and yield an accurate result;
- review the meal counts for the review period to ensure meal counts yield an accurate result, are comparable to the day of review meal counts, and do not exceed the number of eligible students by category (i.e., free, reduced price, and paid).

For the **SFA level** review, the SA must:

- interview staff to determine whether the meal consolidating and claiming procedure reflect the information gathered from the *Off-site Assessment Tool* and meets FNS regulations;
- review the meal counts for the review period to determine whether the meal counts from each school within the SFA were consolidated and claimed correctly according to FNS regulations.

The SA may accept documented corrective action to address erroneous practices during the on-site portion of the Administrative Review, or the documented corrective action may be submitted, as described below. However, all uncorrected meal counts identified during the on-site portion of the review must be recorded for fiscal action.

If errors exist on the day of review and/or the review period, the SA must determine whether the errors were a result of a non-systemic or systemic counting and claiming process either at

the school and/or SFA level. The SA must document all areas identified that support the conclusion of a non-systemic or systemic meal counting finding. Detailed definitions of "non-systemic" and "systemic" findings are provided below:

- **Non-systemic:** If the contributing factors are unusual, not part of the normal operating procedure, and the system does not require changes to achieve accurate results, then the error is non-systemic. An example of a non-systemic counting error is when the cashier punches the wrong button. Additionally, if it is determined by the SA that an error occurred because the cashier was intimidated by the review process, the error is non-systemic. Document all findings that support the conclusion of a non-systemic meal counting problem in the comments section.

  Systemic: If any of the contributing factors are built into the process and would likely recur if the process is not changed, the error is systemic. Systemic errors are serious in nature. The SA must determine the scope of the error by deciding if the same meal count procedures were in place for the review period and/or previous periods. Document all findings that support the conclusion of a systemic meal counting problem in the comments section.

Step 3: Recording Errors

Meal counting and claiming errors are recorded on the *On-site Assessment Tool, School Data and Meal Pattern Error (* Form S-1), *the Fiscal Action Workbook*, and the Other Meal Claim Errors (S-2), as described below in Section VIII: *Fiscal Action*.

Special Considerations

Under certain circumstances, the SA may follow a different review process for this Module than is detailed herein. These variations may include:

- *Provision 2, Provision 3, and Community Eligibility Provision*

The Administrative Review procedures for schools participating in Provision 2, Provision 3, and the Community Eligibility Provision are discussed in Section IX, *Special Provision Options.*

Technical Assistance/Corrective Action

Technical assistance and corrective action are required for all meal counting, claiming, and reimbursement areas resulting in errors. Corrective action must be applied to the SFA and all schools, as appropriate; to ensure that previously deficient practices and procedures are revised system-wide. Needed corrective action is recorded in the comments section of the *On-site Assessment Tool*.

Corrective action must result if:

- The SFA's system does not properly count students' eligibility by category;
- The SFA does not have a backup system for counting and claiming, or the backup system cannot render accurate meal counts for eligible meals;
- The SFA's system does not have appropriate edit checks;
- The SFA's policies for incomplete meals, second meals, visiting student meals, adult and non-student meals, student worker meals, modified meals that do not meet the meal pattern for students with disabilities, a la carte items, field trip meals, or pre-paid meals are not in-line with FNS policy and regulations or require additional information to be appropriate;
- The SFA's alternate point-of-service does not yield accurate counts;
- The cashiers are not appropriately trained.

The SA must determine the appropriate technical assistance to provide to the SFA if any of the issues listed above arises. Other situations may also require the SA to provide technical assistance in order to ensure the SFA remains in compliance with regulations. The SA must

document any technical assistance provided to the SFA at any point during the Administrative Review. Technical assistance is recorded in the comments section of the *On-site Assessment Tool*.

The SA must require corrective action for and document all identified findings.

Fiscal Action

Fiscal action must be assessed for inaccurate meal counting and claiming for the day of review or review period occurring at the school and/or SFA level. For additional information on fiscal action, see Section VIII, *Fiscal Action*, of this manual.

The SFA is allowed to correct any erroneous practices identified by the SA on the day of review. However, any error identified and any SA technical assistance provided on the day of review is still recorded on the *On-site Assessment Tool*. In addition, the SA must calculate fiscal action for any violations identified prior to the correction of the erroneous practice. In these situations, the SFA should not correct their proposed Claim for Reimbursement based on the violations identified by the SA (see Section VIII, *Fiscal Action*, Module: *Fiscal Action Formula*). The SA will provide the SFA with the maximum allowable reimbursable meals based on all errors prior to the corrective action. The meals requiring fiscal action for the day of review at the school level are identified in Questions 318 and 321. The meals requiring fiscal action for the review period at the school level are identified in Questions 322 – 324. Meals in error are recorded on the S-1, Lines 10 and 14 respectively.

School-level Consolidation Errors

Meal count consolidation errors are mathematical mistakes that result in the school reporting incorrect meal counts to the SFA. Fiscal action is taken on the difference between the incorrect and the correct meal counts. The meals requiring fiscal action for the day of review and review

period at the school level are identified in Questions 320 and 325 of the *On-site Assessment Tool*. Meals in error are recorded on the S-1, Lines 13 and 17, respectively. When calculating fiscal action in the Fiscal Action Workbook the SA only assesses the consolidation error once, either at the site level or at the SFA level, whichever is most appropriate.

SFA-level Consolidation Errors

Meal count consolidation errors can also occur at the SFA level when compiling the Claim for Reimbursement. This information is recorded on the *Other Meal Claim Errors*, Form S-2.

Counting Errors

Three types of meal counting errors may occur:

- Meal counts do not equal the number of reimbursable meals served to eligible children;
- Meal counts exceed the number of eligible students by category (i.e., free, reduced price, or paid); or
- Second and/or other ineligible meals (e.g., adult meals or a la carte) were counted.

Second/Other Ineligible Meals Counted

Fiscal action is taken on all meals that were counted as reimbursable meals, but were ineligible for reimbursement, such as second meals and adult meals. This error does not include meals that failed to contain the minimum number of required menu items/food items as described in Section III: *Meal Pattern and Nutritional Quality*.

Note: SFAs may not claim second meals in the NSLP; however, the SFA may claim second meals in the SBP as long as the SFA does not plan and produce meals with the intention of claiming second meals.

Section III: Meal Pattern and Nutritional Quality

Modules contained within this Section include:

- Meal Components and Quantities
- Offer versus Serve
- Dietary Specifications and Nutrient Analysis
- Addendum: Certifying a School Food Authority for Performance-Based Reimbursement During an Administrative Review

Module: Meal Components and Quantities

SFAs operating the NSLP and/or the SBP must follow meal pattern requirements for each age/grade group within all reimbursable meal service lines. (7 CFR 210.10 and 220.8)

Performance Standard 2

Reimbursable lunches must meet the meal requirements in 210.10, as applicable to the age/grade group reviewed. Reimbursable breakfasts must meet the meal requirements in 220.8 and 220.23, as applicable to the age/grade group reviewed.

The meal pattern is the foundation of Federal school nutrition programs, and SA staff must ensure SFAs are offering reimbursable meals at breakfast and lunch according to the regulations.

Intent/Scope of Monitoring

The scope of review for this Module is to establish that meals claimed for reimbursement contain the appropriate meal components (also referred to as food components) and quantities for the SBP and the NSLP.

SA staff must ensure schools operating the NSLP and/or the SBP prepare, offer, and serve meals to students that meet the meal pattern requirements for the appropriate age/grade groups on all reimbursable meal service lines.

Additionally, SA staff must ensure that every reimbursable meal service line meets the daily and weekly meal pattern requirements for the appropriate age/grade group served. This includes verifying how an SFA is meeting the meal pattern requirements if serving multiple age/grade groups, including infants and preschoolers, in a single location, and if school age children are using self-service stations.

Review Procedures

Pre-visit Review Procedures

The SA or the SFA must complete the Menu Worksheet portion of a USDA-approved *Menu Planning Tool for Certification for Six Cent Reimbursement* (referred to as Menu Worksheet from here on) for each school selected for review for a week from the review period. The worksheet should be completed either pre-visit (recommended) or during the on-site visit using production records, menus, recipes, food receipts, and any other documentation that shows meals contained the required components/quantities. The SA should grant the SFA sufficient time to gather and return the requested documentation to the SA for review prior to the scheduled on-site visit. For efficiency, the SA should review the same menus, production records, and standardized recipes for both the *Meal Components and Quantities* and *Dietary Specifications and Nutrient Analysis* as part of the Administrative Review. If the SA feels it needs more information to better understand usual practices at the school, it may choose to examine additional weeks within the review period.

The SA or SFA is not required to complete the Simplified Nutrient Assessment portion of the *Menu Planning Tool*.

The USDA Menu Planning Worksheet is available on the USDA website. A list of commercially available, USDA-approved alternatives to the USDA Menu Planning Worksheet is available on the USDA website. The SA may also use a USDA-approved, State-developed Menu Worksheet. Because the Menu Worksheet does not assess offerings by meal service line, the SA also must review menus and production records to ensure that all required meal components are available on each reimbursable meal service line.

Supporting Documentation

SAs must obtain documentation from the SFA, including menus, production records, USDA Foods Information Sheets, and related materials (e.g., CN Labels, standardized recipes, manufacturer's Product Formulation Statement (PFS)) for the school week under review. SFAs must also provide supporting documentation for modified meals served to students with

disabilities when the modifications do not meet the Program meal pattern requirements. Such meals are only eligible for Federal reimbursement when supported by a medical statement signed by a State licensed healthcare professional. The requirements for the medical statement are outlined in Memorandum, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs (*SP 59-2016) and *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs (*SP 32 CACFP 13 SFSP 15-2015).

Reviewing Documentation

The completion of the Menu Worksheet and review of documentation is intended to establish the SFA's compliance with meal component and food quantity requirements for each age/grade group served. This documentation review is in addition to the meal observation procedures conducted on the day of review (see *On-site Review Procedures*).

When conducting a review of documentation for a school week under review, the minimum number of school days in the week reviewed is three (3), and the maximum is seven (7). All must be consecutive days. The SA may examine any food crediting documentation that is provided to the SA,— including, but not limited to, food labels, USDA Foods Information Sheets, manufacturer's product formulation statements, CN labels, and bid documentation — to ensure meal pattern compliance.

The SA may also consult the Food Buying Guide (FBG). Foods listed in the Food Buying Guide are not required to have a CN Label or a manufacturer's product formulation statement. The information in the FBG may be used to document how a food item credits. The SFA should document and provide the SA a copy of the FBG information that was used to determine the crediting.

If an SFA provides a CN label for crediting of meal components and quantities the SA must not request additional crediting information such as a manufacturer's product formulation statement. However, a CN Label may only provide information on how the product contributes

towards meal pattern requirements, but may not provide nutrient information. Therefore, State agencies may need to request nutrient information, separately from a CN label, for the nutrient analysis in other areas of the review.

Note: CN Labels copied with a watermark may also be used to document meal components and quantities. The watermarked CN Label must be attached to the Bill of Lading or invoice to show proof of purchase. For additional guidance please refer to Memorandum, *Administrative Review Process Regarding the Child Nutrition (CN) Label, Watermarked CN Label and Manufacturer's Product Formulation Statement (*SP27-2015; CACFP09-2015; SFSP12-2015).

SFAs are required to document how foods offered credit toward meal pattern requirements. If the SA finds foods that do not have a CN label, USDA Foods Information Sheets, or a manufacturer's product formulation statements, the SA should use their best judgment to determine if a required component is missing or present in insufficient quantity. For example, a school may not have documentation for a ham sandwich pocket, but the SA may be able to discern that the food item contains meat and grains. In this case, the meat and grains components are offered (i.e. not missing), but the quantities are unknown and therefore could result in insufficient quantities. If documentation is not available the SA must provide technical assistance and require corrective action, which may include ensuring that documentation requirements are met in order to confirm that all items are creditable.

There is a distinct Menu Worksheet for each age/grade group, and there are separate menus for breakfast and lunch. Therefore, the SA must complete a Menu Worksheet (or require the SFA to submit a completed Menu Worksheet) and review menus and production records for each menu type and age/grade group in each reviewed school, for both breakfast and lunch. For example, if a K-8 school serves two lunch menus (one for grades K-5, and one for grades 6-8) and two breakfast menus (again, one for each age/grade group), the SA or SFA would need to complete four Menu Worksheets for that school.

The SA must evaluate production records to ensure the following:

- Records include all information necessary to support the claiming of reimbursable meals and any additional SA requirements (i.e., all menu items are listed and all required meal components are offered);
- Records are used for proper planning (e.g., evaluate for consumption and leftovers);
- Records document food prepared is creditable for the total number of reimbursable meals offered and served;
- Records document a la carte, adult, and/or other non-reimbursable meals, including number of portions for each of these food items; Records document that milk, whole grain-rich, and vegetable sub-group requirements are met;
- Records document weekly quantity requirements for grains, meat/meat alternates, vegetables, fruit, and milk;
- Records align with standardized recipes (e.g., if chicken salad sandwich is on the menu but mayonnaise is not listed on the production records, the SA may examine standardized recipes for additional information); and
- As needed, records to support meal modifications outside the Program meal pattern for students with disabilities. Such meals are only eligible for reimbursement when supported by a medical statement signed by a State licensed healthcare professional.

If reviewing documentation or completing the Menu Worksheet reveals problems with meal components or quantities, the SA should determine if the issue is systemic, or just a one-time occurrence. A systemic problem is a serious problem resulting from factors that are built into the SFA's processes and would likely recur if the processes are not changed. If the contributing factors are unusual, not part of the normal operating procedures, and the SFA's processes do not require changes to achieve accurate results, then the problem is non-systemic. If the issue is systemic, the SA must expand the review of production records to, at a minimum, the entire review period for the site(s) where systemic issues were identified.

On-site Review Procedures

The SA must conduct an on-site assessment of the SFA's meal service for breakfast and lunch to determine whether meals claimed for reimbursement contain the required components and quantities. The SA must:

- conduct a visual observation of meal service lines and review menu documentation on the day of review;
- if not completed off-site, complete a Menu Worksheet and review menus and production records for each school selected for review for a school week during the review period;
- ensure that signage is posted and students know how to select a reimbursable meal;and
- if the school reviewed has a preschool and /or infant meal program and they are not co-mingled (not being served in the same service area as K-5 students), complete the Infant and Pre-K Meal Pattern On Site Validation Checklist included with this manual. If they are co-mingled (served in the same service area) there is no need to complete the checklist. The Pre-K and Infant meal pattern updates are part of the Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010.

On-site Assessment Tool

Questions 400-412 on the *On-site Assessment Tool* focus on whether meals contain the required components and quantities.

Supporting Documentation

If conducting the documentation review on-site, the SA must obtain and examine menus, production records, USDA Foods Information Sheets, and related materials (e.g., CN Labels, standardized recipes, manufacturer's Product Formulation Statement) for the school week under review and complete the Menu Worksheet (or require the SFA to complete the Menu Worksheet). SAs must also examine supporting documentation for modified meals served to children with disabilities when the modifications do not meet Program meal pattern requirements. Such meals are only eligible for Federal reimbursement when supported by a medical statement signed by a State licensed healthcare professional. The requirements for the

medical statement are outlined in Memorandums, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs (*SP 59-2016) and *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs (*SP 32 CACFP 13 SFSP 15-2015).

Step 1: Reviewing Documentation (if not conducted off-site)

Refer to *"Reviewing Documentation"* under Off-site Review Procedures above.

Step 2: Observing the Meal Service

Prior to the beginning of the meal service, the SA will ensure, through on-site observation and a review of documentation, that all reimbursable meal service lines offer all of the required meal components and food quantities for the age/grade groups being served. If multiple age/grade groups including Pre-K are being served in the same service area, the SA must determine how the meal service is structured to meet meal pattern requirements for each age/grade group. When preschoolers are being served in the same service area as K-5 students, the SA may use the flexibility to offer a single menu for those co-mingled grades, refer to *Flexibility for Co-Mingled Preschool Meals: Questions and Answers* (SP 37-2017). Additionally, if visual observation suggests that quantities offered are insufficient, the SA must require the reviewed schools to provide documentation demonstrating that the required amounts of each component were available for service for each day of the review period. The SA must also ensure that signage is posted so students understand how to select a reimbursable meal. Regulations in 7 CFR 210.10(a)(2) require schools to identify reimbursable meals to students; this aims to reduce the unintended purchase of a la carte items and help students make healthy food choices. Findings are recorded in the comments section of the *On-site Assessment Tool*. To the extent possible, the SA must also observe the majority of meal preparation for breakfast and lunch to ensure that standardized recipes are followed (e.g., ingredients are added in amounts specified in the recipe, measurements are being taken appropriately).

During the meal service, the SA must observe a significant number of program meals (breakfast and lunch) at the point-of-service system on every reimbursable meal service line. SAs should observe 5 to 25 percent of meals served (this range takes into consideration differing types of meal services found in SFAs) on each reimbursable meal service line. The intent is for all reimbursable meal service lines in all meal periods to be reviewed if possible. SAs must observe meals at the beginning, middle, and end of the meal service.

During observation, the SA must determine whether the meals selected by students contain the required components or items, and the food quantities required for the age/grade group being served as the students exit the meal service line at the point-of-service. If using service stations, the SA must verify that students have access to all required meal components, offered in the appropriate food quantities, for the appropriate age/grade groups. When reviewing self-service stations, the SA should observe students as they move through the self-service stations and ensure that they demonstrate knowledge of how to access all required meal components in the meal service area. For the purpose of this Module, if multiple lines are serving the same menu, only one line must be validated. However, the SA should spot check all lines for consistency.

When observing meals served in alternate locations (e.g., classroom, in-school suspension, multiple cottages within a RCCI), the SA should select an appropriate number of meals to observe to sufficiently assess the program meals served. To determine the sufficient number of meals to observe, the SA must consider several factors, such as the number of alternate meal service areas; number of SA reviewers; number of meals served; and length of time needed to properly observe the meal service. If an SA observes egregious violations at one alternate location, the SA must review additional alternate locations.

Please note that students with disabilities may require meal components and quantities that differ from the Program meal patterns. These meals are only eligible for reimbursement when the modification is supported by a medical statement signed by a State licensed healthcare

professional. For more information, see Memorandum, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs (*SP 59-2016).

If the SA identifies missing meal components or inadequate quantities prior to the beginning of the meal service, **the SA should inform the SFA staff of the violation and provide an opportunity to make corrections**. The priority is always to ensure students receive a nutritionally-balanced, reimbursable meal. Even if corrected prior to meal service, the SA must document the problem in the comments section of the *On-site Assessment Tool* and list it in the Administrative Review Report to the SFA. The SA should also report the violation at the exit conference.

Note: SAs should refer to information regarding the meal pattern flexibilities that are allowed for and found in the Memorandum School Meal Flexibilities for School Year 2017-2018 (SP-32-*2017)* and to the Updated Preschool Meal Pattern in 7 CFR 220.26 when reviewing this area.

Milk Requirements

The SA must ensure that at least two choices of fluid milk from the following list are offered throughout the meal service on all reimbursable meal service lines: flavored or unflavored fat-free milk, low-fat (1%) milk, fat-free or low-fat lactose-reduced milk, fat-free or low-fat lactose-free milk, fat-free or low-fat buttermilk, and fat-free or low-fat acidified milk. Students must be allowed to choose milk from at least two milk varieties, even in alternate meal service locations.

Note: During SY 2017-18, schools that have demonstrated hardship meeting milk requirements by documenting a reduction in student milk consumption or an increase in school milk waste may be allowed to offer low-fat (1% milk fat), flavored milk through the NSLP and the SBP and as a competitive food available for sale on campus during the school day. As have discretion to grant exemptions to SFAs under Section 747(c) of the Appropriations Act. For additional information, see SP 32-2017, *School Meal Flexibilities for School Year 2017-2018*

If any milk substitutions are made for non-disability reasons, in order for the meals to be eligible for Federal reimbursement, the SA must ensure the substitutions meetsubstitutionsmeet FNS nutrient requirements, as outlined at 7 CFR 210.10(d)(3). Because the Nutrition Facts Label may not list all of the required nutrients, the school food service may need to request documentation from the product manufacturer to confirm the presence of all required nutrients at the proper levels, and must maintain this documentation for review. For additional information, refer to 7 CFR 210.10(d) and 7 CFR 210.10(m); FNS Instructions 783-7, *Milk Requirement-Child Nutrition Programs* (revised, issued January 24, 1995); and FNS Memorandum SP 07-2010, *Q and As: Milk Substitutions for Children with Medical or Special Dietary Needs (Non-Disability)*, issued November 12, 2009.

The nutrient requirements for fluid milk substitutions do not apply to cases of disability. SFAs will receive reimbursement for meals that substitute fluid milk products that do not meet the nutrient requirements, provided the substitution is supported by a written medical statement signed by a State licensed healthcare professional. See FNS Memorandum SP 59-2016, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs* and FNS Memorandum SP 32-2015, *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs.*

Note: Program operators are not to promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area. Signs describing the reimbursable meal must convey that milk is offered as a food component in a reimbursable meal and not as a beverage choice.

Fruit or Vegetable Juice Requirement

Fruit and/or vegetable juice may be used to meet up to half of the fruit or vegetable requirement. For additional information, see FNS Memorandum SP 10-2012 v. 9, *Questions and Answers on Final Rule "Nutrition Standards in the National School Lunch and Breakfast Programs",* see FNS PartnerWeb for policy memorandums.

Vegetable Subgroup and Whole Grain-rich Requirements

The SA must ensure that, over the course of the school week, meals offered to students meet the vegetable subgroup and whole grain-rich requirements specified in 7 CFR 210.10. This includes ensuring that required amounts of whole grain-rich foods are offered and determining that grain-based desserts are limited to no more than 2 oz. eq. per week.

For additional information on whole grain-rich requirements, the SA should reference FNS Memorandum SP 30-2012, *Grain Requirements for the National School Lunch Program and School Breakfast Program* and the *Whole Grain Resource for the National School Lunch and School Breakfast Programs*, available on FNS PartnerWeb.

Note: Based on Section 747(a) of the Appropriations Act, for SY 2017-2018, SAs may offer exemptions from the whole grain-rich requirements in the NSLP and SBP if an SFA can demonstrate hardship(s) in procuring, preparing, or serving compliant whole grain-rich products that are accepted by students.

SFAs that receive an exemption are considered compliant with the whole grain-rich requirements during an Administrative Review if the grain offerings are consistent with the exemption granted by the SA and at least half of the grains offered weekly are whole grain-rich. However, at a minimum, SFAs must comply with the SY 2013-2014 requirement to offer at least half of the grains which meet the whole grain-rich criteria. For additional information, see SP 32-2017, *School Meal Flexibilities for School Year 2017-2018*.

Menu Substitutions

SFAs are encouraged to consider cultural, religious, and ethical preferences when planning and preparing meals. Accommodating student preferences helps to maintain participation in the NSLP and SBP. Variations, whether on an experimental or continuing basis, must be consistent with the food and nutrition requirements specified in Program regulations (7 CFR 210.10 and 7 CFR 220.8) in order for the meals to be eligible for reimbursement. If any substitutions are made from the planned menu for the day of review or the school week during the review period, the SA must validate whether the daily/weekly meal pattern requirements are met.

While FNS strongly encourages "like" substitutions (such as spinach for romaine lettuce)) meals are compliant as long as the daily and weekly requirements are met.

Accommodations for Children with Disabilities

SFAs must comply with USDA regulations regarding nondiscrimination at 7 CFR Parts 15, 15a, and 15b. This includes ensuring children with disabilities have an equal opportunity to benefit from the NSLP and SBP. Certain physical or mental impairments require meal modifications that do not follow the required Program meal pattern. Meal modifications outside the meal pattern are reimbursable, provided the request is supported by a medical statement signed by a State licensed healthcare professional. If a meal modification for a child's disability can be made within the meal pattern requirements, FNS does not require a medical statement. See FNS Memorandum SP 59-2016, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs and* FNS memorandum SP 32-2015, *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs* for more information.

Family Style Meal Service

When reviewing a family style meal service, the SA should refer to procedures outlined in FNS Memorandum SP 35-2011, *Clarification on the Use of Offer versus Serve(OVS) and Family Style Meal Service* and FNS Instruction 783-9, rev 2, *Family Style Meal Service in the Child and Adult Care Food Program.* When reviewing a preschool, please note that FNS does not allow OVS for preschoolers, rather it encourages Family Style Meal Service.

Field Trips

The SA should review and evaluate field trip meals served on the day of review and the school week during the review period. Field trip menus must meet daily and weekly meal component and quantity requirements. Refer to FNS Instruction 786-8, rev 1, *Reimbursement for Off-Site Meal Consumption.*

Traditional Foods

The SA may encounter the service of traditional foods during an Administrative Review, such as native whole blue corn kernel, bison, venison or sheep. If a food is served as part of a reimbursable meal, but not listed in the Food Buying Guide, the yield information of a similar food or in-house yield may be used to determine the contribution towards meal pattern requirements. When this is the case, traditional foods may credit similar to products found in the FBG. FNS Memorandum TA 01-2015, *Child Nutrition Programs and Traditional Foods*, provides guidance to the reviewer on how to credit traditional foods towards meal pattern requirements.

Step 3: Recording Errors

The SA must record meals missing components and meals that do not meet quantity requirements.

Missing Meal Components:

Errors related to missing meal components are recorded on the *On-site Assessment Tool*, Questions 400 – 401 (day of review) and Questions 409 and 411 (review period). The SA must also record the number of meals missing meal components on the *School Data and Meal Pattern Error Form,* S-1, Lines 11 and 15, respectively.

Insufficient Quantities/Incomplete Meals:

Meals that do not meet quantity requirements are recorded on the *On-site Assessment Tool*, Questions 402 – 403 and 407 (day of review) and Question 410 (review period). Meals that contain insufficient quantities of meal components are incomplete. Incomplete meals claimed for reimbursement that will be subject to fiscal action (for repeated violations) must be recorded on the *School Data and Meal Pattern Error Form* S-1, Lines 12 and 16.

When multiple meal pattern violations are identified for a meal, list all violations in the appropriate comments section. Record meals with multiple violations on the S-1 under only one meal violation category to ensure that fiscal action is applied only once. If multiple violations include meals that are offered that are missing meal components, record the meal under the missing meal component category. For all other multiple meal pattern error violations, record repeated vegetable subgroup or milk type violations before all other violations. For all other multiple meal pattern violations, use discretion and record the most egregious violation for fiscal action.

Technical Assistance/Corrective Action

When the SA conducts an Administrative Review and finds that the SFA is not meeting meal pattern requirements, technical assistance and corrective action are the first steps that must be taken. SAs and SFAs should develop a Corrective Action Plan with specific steps and reasonable timelines for bringing the SFA into compliance. The Corrective Action Plan will vary depending on the nature of the changes necessary.

The SA must require immediate corrective action for any missing meal components found during an on-site observation on the day of review, or found while examining the Menu Worksheet and/or reviewing menu documentation for the school week during the review period.

The school must immediately add the missing meal component(s) before any additional meals are claimed for reimbursement on: 1) the day of review, or 2) on future days on which the deficient menu is offered. In addition to immediate corrective action, the SA must require written corrective action to ensure such violations do not occur in the future.

For missing meal components identified from examining the Menu Worksheet and/or reviewing menu documentation, the SA may allow the SFA to provide documentation (e.g., invoices, food inventory tracking) to demonstrate that the missing meal component was actually offered.

In addition, SAs must require corrective action for violations related to vegetable subgroups, milk types, whole grain-rich foods, and food quantities to help bring the SFA into compliance with the meal pattern requirements. This includes both violations observed on the day of review and those identified from the review of production records and completing the Menu worksheet.

When production records are incomplete, **the SA should provide targeted technical assistance** to emphasize the importance of complete and accurate production records. The SA and SFA should ensure that the school food service manager understands the deficiencies and steps that should be taken to make sure that production records are complete and accurate.

When errors are found in SFAs with central/satellite kitchens and/or district-wide menus the SA must provide technical assistance to ensure the SFA corrects the problem at all affected sites. The rationale for this is that, even though meals were prepared in a single location, the non-reimbursable meals were served throughout the SFA. This same rationale would apply to menus implemented district-wide.

Fiscal Action

Fiscal action requirements are described below. For additional information refer to Section VIII, *Fiscal* Action and FNS Memorandum SP 54-2014*, Administrative Reviews and Certification for Performance-Based Reimbursement in SY 2014-2015* available on FNS PartnerWeb. When errors are found in SFAs with central/satellite kitchens and/or district-wide menus, the SA must assess fiscal action for all sites, reviewed and non-reviewed, in which the non-reimbursable meals were served. The rationale for this is that, even though meals were prepared in a single

location, the non-reimbursable meals were served throughout the SFA. *Missing Meal Components*

The SA must take fiscal action when a meal component is missing.

Missing Production Records

SFAs are required to maintain documentation that demonstrates how meals offered to students meet meal pattern requirements. SFAs are required to document that reimbursable meals are offered. If production records are missing, or missing for a certain time period, meals served during that time must be disallowed/reclaimed unless the SFA is able to demonstrate to the satisfaction of the SA that reimbursable meals were offered and served. FNS encourages SAs to accept documentation such as invoices and/or food inventory tracking records as acceptable documentation in recreating missing production records. SAs should, however, provide training and technical assistance for noncompliant SFAs in proper production recordkeeping practices. This approach should ensure that missing production records are not a recurring issue.

Vegetable Subgroups and/or Milk Type Findings

For repeated violations involving vegetable subgroups and/or milk type cited in 7 CFR 210.18 (g) (2), the SA must take fiscal action.

- If only one type of milk is offered (i.e., milk variety requirement not met) or an unallowable milk type is offered, meals must be disallowed and/or reclaimed for the duration that only one milk type was offered. Any meals selected with an unallowable milk type must also be disallowed/reclaimed. This only applies to the K-5 6-8, and 9-12 meal patterns since preschools implementing the updated Pre-K meal pattern are following new requirements. If an unallowable milk type is offered in preschool, they must be provided technical assistance (rather than fiscal action).
- If one vegetable subgroup is not offered over the course of the week reviewed, the reviewer should evaluate the cause(s) of the error to determine the appropriate fiscal action. All meals served in the deficient week may be disallowed/reclaimed.

Quantities and/or Whole Grain-rich Findings

For repeated violations involving food quantities and/or whole grain-rich foods cited in 7 CFR 210.18 (g)(2), the SA has discretion to apply fiscal action. The reviewer should evaluate the cause(s) of the error to determine the extent of fiscal action.

- The SA has discretion to disallow/reclaim meals containing insufficient quantities of required meal components.
- If whole grain-rich foods are not offered over the course of the week reviewed, all meals served in the deficient week may be disallowed/reclaimed.
- If insufficient whole grain-rich foods are offered, the SA may disallow/reclaim meals for one day during the week under review. The SA has discretion to select which day's meals are disallowed/reclaimed. Additional meals may be disallowed/reclaimed at the SA's discretion.
- If a vegetable subgroup is offered in insufficient quantity to meet the minimum weekly requirement, meals may be disallowed/reclaimed for one day that week. The SA has discretion to select which day's meals are disallowed/reclaimed.
- If the amount of fruit or vegetable juice offered exceeds 50 percent of the total weekly fruits or vegetables offered, meals may be disallowed/reclaimed for one day that week. The SA has discretion to select which day's meals are disallowed/reclaimed. Additional meals may be disallowed/reclaimed at the SA's discretion.

Repeated Violations

Fiscal action may only be taken for repeated violations specified in the previous paragraphs if:

- The SA has provided technical assistance
- The SA has previously required and monitored corrective action
- The SFA remains noncompliant with the meal requirements established in 7 CFR 210 or 220

Performance-based Certification Funding (6 cents)

If the Administrative Review finds that significant noncompliance exists, requiring the SFA to develop and implement a Corrective Action Plan over an extended period of time (i.e., problems cannot be fixed immediately), the SA must use their best judgment to assess the longevity and severity of the problems. If the SA determines that the performance-based reimbursement should be terminated, it should be terminated beginning the month following the on-site Administrative Review and, at State discretion, for the month of review. Previously paid performance-based reimbursement would only be recovered in circumstances of clearly egregious or willful noncompliance by a SFA.

Performance-based reimbursement may resume beginning in the first full month the SFA demonstrates to the satisfaction of the SA that corrective action has taken place.

For additional guidance on technical assistance and corrective action, see FNS Memorandum, SP 54-2014*, Administrative Reviews and Certification for Performance-Based Reimbursement in SY 2014-2015* available on FNS PartnerWeb.

When the performance-based reimbursement is terminated, and the SFA operates both NSLP and the Seamless Summer Option, refer to Section VIII, *Fiscal Action*, Module: *Overview of Fiscal Action*, Duration of Fiscal Action, Performance-based Reimbursement.

Module: Offer versus Serve

Intent/Scope of Monitoring

"Offer versus Serve" is a provision in the NSLP and SBP that allows students to decline some of the food components/items offered. Offer versus Serve gives students more control over the foods they consume, and may help SFAs reduce plate waste and improve student's perceptions of the NSLP and SBP. . At the high school level, Offer versus Serve is required in the NSLP and optional in the SBP. At the elementary and middle school levels, Offer versus Serve is optional in both the NSLP and SBP. Offer versus Serve is encouraged for any site/meal service where it can be accommodated. Offer versus Serve is not appropriate for snack service or preschool age students. The review of Offer versus Serve is a Performance Standard 2 review element.

In SFAs that implement Offer versus Serve, menu planners must ensure they prepare and offer enough food to meet meal pattern requirements, and point-of-service staff must ensure students select enough components/items to make a reimbursable meal.

When determining Offer versus Serve compliance, the SA must consider whether:

- The school offers the appropriate food components/items on all reimbursable meal service lines;
    - Five food components (milk, fruits, vegetables, grains, and meats/meat alternates) in the NSLP.
    - Four food items from three food components (milk, fruits, and grains) in the SBP.
- Signage is posted on the service line to assist students in selecting a reimbursable meal;
- Students are selecting at least three food components (in NSLP) or three food items (in SBP) in the proper quantities to make a reimbursable meal;

- Students select - at least a ½ cup of fruit and/or vegetable as part of their food components/items; and
- Food service staff members at the point-of-service are trained and accurately recognize a reimbursable meal, including appropriate quantities.

It is essential that food service staff understand the importance of offering all of the food required by the meal patterns to all students. As it is not enough to have the food available to students stored away in a cooler, for example, as a strategy to reduce plate waste, in the event a student asks for the meal components or food items. Not offering all of the components to each child directly conflicts with the Offer versus Serve requirements.

It is important for the SA to understand the Offer versus Serve procedures in place at the school being reviewed prior to observation of the meal service.

Alternate Meal Service Locations

USDA does not require a SFA to alter their meal service system(s) to accommodate Offer versus Serve in situations where Offer versus Serve implementation is difficult (e.g., pre-packaged lunches in high schools, and alternate meal service locations). When implementation of the Offer versus Serve requirement becomes difficult in high schools such as on field trips, the SA must approve the alternate service method. SAs and SFAs are strongly encouraged to work together to develop creative ways to implement Offer versus Serve in alternate meal service locations, even if that means offering choices only for certain meal components (e.g., fruit, milk).

Offer versus Serve Edit Check

The number of servings of components/items = 1900
- **Milk = 400**
- **Juice = 150**
- **Apples = 125**
- **Oranges = 125**
- **Burger/Bun = 100 + 100**
- **Broccoli = 300**
- **Chicken nuggets = 300 + 300**

The number of meals served = 400

1900/400 = 4.75 components/items per child

Review Procedures

Pre-visit Review Procedures

Supporting Documentation

- Production records

Off-site Review Procedures

Prior to the Administrative Review, the SA should review the SFA's or school's Offer versus Serve policy.

Step 1: Performing an Edit Check (optional)

The SA has the option to perform an Offer versus Serve edit check prior to conducting the on-site Administrative Review and/or while on-site to determine if the school is preparing enough food. The Offer versus Serve edit check can alert the SA to possible noncompliance in Offer versus Serve implementation.

To perform the edit check, the SA should review production records to determine what has been offered. The SA should then divide the total number of servings of food components or food items by the total number of meals served.

Optional Edit Check: $\frac{\text{Total Number of Servings of Food Components (NSLP) or Food Items (as credited for SBP)}}{\text{Total Number of Meals Served}}$

If the result is greater than or equal to three, then the school is preparing enough food components/items for each student to select at least three components/items as required. If the result is less than three, the school may not be producing enough food. This will require further discussion with food service staff to determine how food components/items contribute to meal pattern requirements, as a single food item may contribute to multiple food components.

If the result is less than three, the SA should proceed with the review being mindful of possible noncompliance in this area.

On-site Review Procedures

On-site Assessment Tool

The SA must record review findings on Questions 401-402 and Questions 500-502 of the *On-site Assessment Tool*.

On-site Review

Step 1: Evaluate Prior to Meal Service

Prior to the beginning of the meal service, the SA should determine whether or not the school is implementing Offer versus Serve. To evaluate compliance with the Offer versus Serve requirements, the SA must interview food service staff to assess whether:

- Staff training has been conducted
- Staff understand what constitutes a reimbursable meal
- Staff understand the number of meal components/food items required for a reimbursable meal
- Staff properly distinguish reimbursable meals from a la carte purchases
- Students understand how to select a reimbursable meal, and understand they can select more than the minimum number of food components and items required for a reimbursable meal (i.e., students can select all five food components that are offered at lunch)
- Signage has been posted explaining Offer versus Serve to students. Regulations in 7 CFR 210.10(a)(2) require schools to identify reimbursable meals to students; this aims to reduce the unintended purchase of a la carte items and help students select a balanced meal.
- SFAs that participate in Offer versus Serve ensure all required food components/items are made available to all children.
- SFAs cannot accommodate a child's disability by simply asking the child to exclude a food component/item from their selection. Children with disabilities must have the same opportunity to select all required food components/items

Step 2: Observe During the Meal Service

During the meal service observation, the SA must:

- Determine whether the school offers the appropriate food components/items on all reimbursable meal service lines:
    - Five food components (milk, fruits, vegetables, grains, and meats/meat alternates) in the NSLP
    - Four food items from three food components (milk, fruits, and grains) in the SBP
- Determine whether the meals selected by students contain a minimum of three food components (in the NSLP) or a minimum of three food items (in the SBP) as the students exit the meal service line
- Determine whether each reimbursable meal contains at least ½ cup of fruits and/or vegetables
- Verify that food service staff members are accurately judging quantities when the school uses service stations, theme bars, or self-serve bars
- Observe students as they move through the service lines and ensure that students know how to select a reimbursable meal under Offer versus Serve
- Determine whether food service staff/cashiers understand what constitutes a reimbursable meal in Offer versus Serve and that water does not count as one of the required components/food items

NSLP Example:
Jane Smith, student at Stellar High School

5 Full Components Offered:

- Milk (8 oz.)
- Grilled Chicken (2 oz.)
- Biscuit (2oz.)
- Broccoli (1/2 cup) and Carrots (1/2 cup)
- Applesauce (1/2 cup) and Mandarin Oranges (1/2 cup)

Jane must select at least 3 components for her meal to be reimbursable.

Jane selects the meat, fruit, and vegetable as her 3 components.

If for her vegetable selection she selects only one vegetable (either ½ cup of broccoli *or* ½ cup of carrots), she must take the full fruit component offered (½ cup of applesauce *and* ½ cup of mandarin oranges).

Similarly, if for her fruit selection, she selects only one of the fruits (either ½ cup applesauce *or* ½ cup mandarin oranges), she must take the full vegetable component offered (½ cup of broccoli *and* ½ cup of carrots).

Fruit and Vegetable Requirements

Students must select at least a ½ cup of either the fruit or the vegetable component, or a ½ cup combination of both components (e.g., ¼ cup fruits and ¼ cup vegetables) for a meal to be reimbursable under Offer versus Serve.

If a student's selection only has three components/items, and one component/item is the fruit and one component/item is the

vegetable, the student must select the full amount (1 cup total) of at least one of the components (fruit or vegetable). An example is included in the text box to the right.

More details can be found in FNS Memorandum SP 10-2012 v. 9 *Questions & Answers on the Final Rule, "Nutrition Standards in the National School Lunch and School Breakfast Programs"*, and the *USDA Offer versus Serve Manual*, effective SY 2015-16.

Alternate Meal Service Locations

Meals served at alternate meal service locations must meet Offer versus Serve requirements, if applicable.

Lunches Consumed Off-site

In high schools, Offer versus Serve can be omitted for lunches consumed off-site, such as on field trips, with approval from the SA. Meals served off-site must meet regular Program meal pattern requirements, outlined at 7 CFR 210.10(m) and 7 CFR 220.8(m). See FNS Instruction 786-8, *Reimbursement for Off-Site Meal Consumption,* for additional guidance.

Non-reimbursable meals

Meals that contain fewer than three different food components (in the NSLP) or three food items (in the SBP) are not reimbursable under Offer versus Serve.

Under Offer versus Serve, meals with less than ½ cup of fruits and/or vegetables are not reimbursable. The SA must disallow/reclaim meals with less than ½ cup of fruits and/or vegetables.

Step 3: Recording Errors

Review findings related to Offer versus Serve implementation are recorded on the *On-site Assessment Tool*, Questions 500-502.

Additionally, errors related to non-reimbursable meals are recorded on the *On-site Assessment Tool*, Questions 401-402.

- Meals that contain fewer than three components/food items, or meals that do not include a ½ cup of fruit and/or vegetable, are recorded on Question 401.
- Meals that contain a fruit and/or vegetable, but less than the required ½ cup, are recorded on Question 402.

Technical Assistance/Corrective Action

The SA must provide technical assistance to bring meals into compliance and ensure that the SFA only claims reimbursable meals, containing at least three food components (in the NSLP) or at least three food items (in the SBP), in the required quantities, including at least ½ cup of a fruit and/or vegetable...

If areas of noncompliance are identified, the SA must record the findings in the comment section for Questions 500-502 of the *On-site Assessment Tool.* For example, if a student selects three meal components (in the NSLP) or three food items (in the SBP) (including ½ cup of fruit and/or vegetable) but declines milk, and the cashier sends the student back to get milk, the cashier's action should be cited as an opportunity for technical assistance . Students are not required to select milk in Offer versus Serve.

The SA should pay particular attention to any errors suggestive of systemic problems. For example, if the cashier counts a meal as reimbursable that is missing the required number of Offer versus Serve food components (in the NSLP) or food items (in the SBP), the SA must determine whether this is a one-time occurrence or representative of a systemic issue.

If this error is not a one-time error, and determined systemic, training the SFA in Offer versus Serve should be included in the Corrective Action Plan. The SA must provide technical

assistance to the SFA for food component/item and/or quantity errors involving Offer versus Serve in order to bring the SFA into compliance.

Fiscal Action

Refer to the *Meal Components and Quantities* module in this section to better understand the fiscal action requirements that apply to Offer versus Serve. The only error that applies exclusively under Offer versus Serve is disallowance of meals that have less than ½ cup of fruits and/or vegetables. Other meal pattern errors are captured under the *Meal Components and Quantities* module. Meals that contain less than ½ cup fruits and/or vegetables are recorded on Questions 401 and 500 of the *On-site Assessment Tool*.

Module: Dietary Specifications and Nutrient Analysis

Intent/Scope of Monitoring

The Dietary Specifications and Nutrient Analysis Module details procedures to assess whether meals offered to children through the school meal programs are consistent with Federal standards for calories, saturated fat, sodium, and *trans* fat (7 CFR 210.10 (f) and 7 CFR 220.8(f)). To reduce childhood obesity and minimize students' risk of chronic disease, SA staff must ensure SFAs are offering meals that meet regulatory requirements.

Review Procedures

The SA must assess compliance with the Module: *Meal Components and Quantities* before assessing compliance with this Module.

Note: The procedures outlined below (except fiscal action) will not be followed when certifying a SFA for the additional 6 cents reimbursement during an Administrative Review. For additional information, see *Addendum: Certifying a School Food Authority for Performance-based Reimbursement during an Administrative Review*.

Pre-visit Review Procedures

Off-site Assessment Tool

The SA will need to address Questions 600-602 of the *Off-site Assessment Tool* based on the information obtained from completing the *Meal Compliance Risk Assessment Tool* and the *Dietary Specifications Assessment Tool*, if applicable.

Step 1: Selecting which Reviewed School is Most At Risk

The SA must determine which of the reviewed schools (as identified in Section I: *Pre-visit Procedures*, *Site Selection,* of this manual) is at highest risk for meal compliance violations. Working with the SFA, the SA must complete the *Meal Compliance Risk Assessment Tool* for each reviewed school. This screening tool assesses error-prone areas (e.g., multiple meal service lines, multiple age-grade groups, alternate meal service locations) and scores the reviewed school's risk for violations.

The Meal Compliance Risk Assessment Tool

Assesses error-prone areas and scores the reviewed site's risk for violations

Supporting Documentation

Supporting documentation is not needed to complete the *Meal Compliance Risk Assessment Tool*. However, supporting documentation is required to complete the targeted menu review (see options under Step 3 below).

Step 2: Selecting the School Subject to a Targeted Menu Review

Based on the results of the *Meal Compliance Risk Assessment Tool* in Step 1, the SA must select the school with the highest score, indicating the highest risk for meal compliance violations. This school is subject to the targeted menu review as described in Step 3.

If two schools have the same *Meal Compliance Risk Assessment Tool* score, the SA may use the following criteria to select the school for in-depth menu review (in order):

1. Previous Performance Standard 2 noncompliance (based on historical review findings)
2. No past Administrative Review for the school
3. Request of the School Food Service Director

Thither SA must conduct a targeted menu review, in accordance with one of the options described in Step 3, for the school determined to be at the highest risk. If the school selected for the targeted menu review only operates the SBP, the SA must select the highest scoring school that participates in **both** NSLP and SBP. The school operating the SBP only must be included as one of the schools selected for a SBP review (refer to Section I: *Pre-visit Procedures*, *Site Selection Procedures*).

Step 3: Determining the SA's Targeted Menu Review Approach and Conducting the Review
The SA has discretion to select one of four options for the targeted menu review of the one at-risk school identified in Step 2 above.

Each option described below is distinct and the SA must adopt one option in its entirety (i.e., the SA cannot combine facets of different options to complete the review). Noncompliance with meal pattern requirements at the targeted menu review school may indicate high-risk for noncompliance with Dietary Specifications. Please note that infant and pre-k meals following the CACFP meal pattern are not included in the Dietary Specifications and a nutrient analysis is not required. In case of noncompliance they should be oferred technical assistance. For others, SAs should determine if findings are systemic or non-systemic. Systemic findings indicate high risk for noncompliance and the SA must conduct a nutrient analysis. For non-systemic findings, SAs have discretion to conduct a nutrient analysis or continue following the low risk path. The nutrient analysis would be conducted after the SFA implements corrective action to come into compliance with the meal component and quantity requirements. However, non-systemic findings may still require technical assistance, corrective action, and/or fiscal action.

The SA may select one of the following for the Targeted Menu Review Options:

Summary of Targeted Menu Review Options

Option:	Requires Off-site Review Activities	Nutrient Analysis May Not Be Required (Possible LOW-RISK status)	Nutrient Analysis Required (HIGH-RISK status)	On-site Review Required Using *Dietary Specifications Assessment Tool*
1. Complete Dietary Specifications Assessment Tool	X	X	Only for high-risk schools	X
2. Validate Existing Nutrient Analysis (performed by SFA or contractor)			X	X
3. Conduct Nutrient Analysis (performed by SA)			X	X
4. Use FNS-Approved Process Utilizing *Menu Planning Tools for Certification for Six Cent Reimbursement*	State must submit methodology to FNS for approval Approvals are granted to SAs			

Dietary Specifications Assessment Tool

The *Dietary Specifications Assessment Tool* captures information about operational and menu planning practices and enables the SA to further examine the school's compliance with the meal pattern requirements for the SBP and NSLP.

The Dietary Specifications Assessment Tool

Analyzes food service practices for breakfast and lunch to determine whether the meals are at risk for not meeting the required dietary specifications

The *Dietary Specifications Assessment Tool* contains off-site and on-site review elements. SAs that elect the risk-based approach (Option 1 below) to assess compliance with Dietary Specifications must complete the Tool off-site; however, the on-site portion of the Tool must be completed for all Targeted Menu Review options. The Tool is intended to evaluate specific food service practices for breakfast and lunch to determine the level of risk for not meeting the Dietary Specifications regulatory requirements. When electing to validate or conduct a nutrient analysis, the SA may disregard the risk determination indicated by the tool and continue to follow the procedures for validating or conducting a nutrient analysis. However, the SA should provide technical assistance to address any areas of concern identified by the Tool. It is important to note that not all of the questions associated with the Tool are intended to imply that the related activity

is prohibited; rather, they reflect the possibility of a need for further review.

The following pages outline the four options that the SA may select for the targeted menu review:

Option 1: Complete the *Dietary Specifications Assessment Tool*

Responses to the off-site portion of the *Dietary Specifications Assessment Tool* determine whether the school selected for a targeted menu review is low-risk or high-risk for noncompliance with Dietary Specifications regulatory requirements.

The SA will follow on-site procedures that correspond with the low-risk or high-risk determination. If the school selected for a targeted menu review is low-risk, the SA must verify compliance during the on-site review using the on-site portion of the *Dietary Specifications Assessment Tool* and follow the appropriate on-site procedures based on the risk determination indicated. A nutrient analysis may not be required. If the targeted menu review school is high-risk, the SA must complete a nutrient analysis for both breakfast and lunch (if applicable) using USDA-approved software and complete the high risk on-site review procedures.

Off-site Review Procedures

To determine risk, the SA must complete the off-site portion of the *Dietary Specifications Assessment Tool,* which requires that the SA:

- Request at least one week of menu documentation from the review period for breakfast and lunch, including but not limited to:
    - Menus
    - Production records
    - Standardized recipes
    - USDA Foods Information Sheets
    - Nutrition Information

- How the products contribute toward meal pattern requirements (often in the form of a CN Label or a product formulation statement, but not both)

Review the menu documentation from the review period to examine the school's compliance with the meal pattern requirements for SBP and NSLP. For efficiency, the SA should review the same menus, production records, and standardized recipes for the week used to review the Module on *Meal Components and Quantities*. If the SA feels it needs more information to better understand usual practices at the school, it may choose to review additional weeks within the review period. However, **the week selected for review must be in compliance with meal component requirements at a minimum, and noted noncompliance must be addressed prior to conducting a nutrient analysis**. This may result in the SA being required to conduct a nutrient analysis on a week outside of the review period. If fiscal action is required for a week outside the review period, see Fiscal Action (below) for additional information.

- Interview the SFA prior to the on-site review to complete the off-site portion of the *Dietary Specifications Assessment Tool*. Completion of the *Dietary Specifications Assessment Tool* requires information about food service practices that may not be included in menu documentation.

The SA should grant the SFA sufficient time to gather and return the requested documentation to the SA for review prior to the scheduled on-site visit.

On-site Review Procedures

Procedures for Low-risk Schools

If the off-site portion of the *Dietary Specifications Assessment Tool* indicates the school is low-risk, the SA must validate the low-risk status through:

- Observation of the meal preparation and meal service, and completion of the on-site

portion of the *Dietary Specifications Assessment Tool* (this will help identify areas where the SA can provide targeted technical assistance) and respond to Questions 603-605 of the *On-site Assessment Tool*.

- Review of food storage on the day of the review to check labels.
- Evaluation of menus, production records, recipes, and any other documentation that supports the meals offered.

When validating low-risk status through on-site review, the SA may encounter the following situations:

- *On-site Observation Supports Low-risk Status*

  A nutrient analysis is not required. However, even low-risk schools will likely be able to improve menu practices and meal quality. SAs must provide technical assistance to address any areas of concern identified by the Tool. Any technical assistance provided must be recorded on Question 603 of the *On-site Assessment Tool*. SAs also have discretion to request corrective action. When technical assistance and corrective action (if applicable) are complete, the targeted menu review is also complete.

  NOTE: The SA has the discretion to conduct a nutrient analysis and is encouraged to do so if it has concerns about the SFA's food service practices.

- *On-site Observation Does Not Support Low-risk Status*

  If the on-site portion of the *Dietary Specifications Assessment Tool* is determined high-risk based on observation and supporting documentation, the SA must conduct a weighted nutrient analysis for breakfast and lunch following the *High-risk On-site Review Procedures* described below.

- *On-site Observation Does Not Support Low-risk Status and Severe Noncompliance Identified*

If the SA identifies severe noncompliance, the school will automatically be categorized as high-risk. The SA may use discretion when determining "severe noncompliance" based on their observations. Severe noncompliance could be, but is not limited to, any of the following findings:

- Missing meal components
- Missing vegetable subgroups
- Missing production records
- Inadequate quantities (systemic issue, as determined by expanded review)
- Minimum quantity requirements not met for grains and or meats/meat alternates (systemic issue)

Severe noncompliance includes one or more practices observed on-site that could indicate violations of the Dietary Specifications. Reviewers must determine the severity of noncompliance. If those practices put the school at risk for violating Dietary Specifications requirements, the SA must conduct a weighted nutrient analysis for breakfast and lunch following the *High-risk On-site Review Procedures* described below.

Procedures for High-Risk Schools

For sites determined to be at high-risk, the SA must conduct or validate a weighted nutrient analysis for one week from the review period for breakfast and lunch. To conduct a weighted nutrient analysis on meals offered for each age/grade group and menu type at breakfast and lunch, the SA must request breakfast and lunch documentation, including menus, production records, standardized recipes, Nutrition Facts Labels, crediting documentation, and manufacturer specification sheets.

The Nutrient Analysis and Validation Checklist

Compiles information needed to conduct or validate a nutrient analysis. It includes a list of necessary menu documentation, important considerations, and space for reviewers to note comments

The SA will proceed to the *Nutrient Analysis and Validation Checklist*, complete the on-site portion of the *Dietary Specifications Assessment Tool* (which will help identify areas where the SA can provide targeted technical assistance), and respond to Questions 603-605 of the *On-site Assessment Tool*. The SA must request corrective action and/or assess fiscal action

as appropriate.

During the on-site portion of the Administrative Review, the SA will have the opportunity to examine menu documentation with the SFA and clarify any questions. In addition, the SA will provide targeted technical assistance for the areas contributing to high-risk status and request corrective action as needed.

The nutrient analysis must be completed in order for the SA to close the Administrative Review. If the nutrient analysis is not completed before the SA sends the Administrative Review Report to the SFA, the SA must advise the SFA that the review remains open until the nutrient analysis is complete.

For detailed instructions on conducting a weighted nutrient analysis using USDA-approved software, refer to FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

Option 2: Validate Existing Nutrient Analysis

Off-site Review Procedures

The SA may validate an existing nutrient analysis conducted by the SFA (or contractor) using USDA-approved nutrient analysis software for the school selected for a targeted menu review. The SA is encouraged to begin activities to validate the nutrient analysis (e.g., collecting menu documentation, data entry) prior to the on-site review, but it is not required. Completing some or all of this work in advance allows for more time on-site to provide targeted technical assistance.

The SA will proceed to the *Nutrient Analysis and Validation Checklist*, which provides a detailed checklist for validating a nutrient analysis. The SFA must provide to the SA a copy of the nutrient analysis (for breakfast and lunch) for the week of review and corresponding backup documentation for validation. Supporting documentation should include, but is not limited to:

- Menus
- Production Records (detailing what was offered to students)
- Standardized recipes
- USDA Foods Information Sheets
- Nutrition Information
- Information about how the products contribute toward meal pattern requirements (often in the form of a CN Label, CN Label copied with a watermark along with the Bill of Lading, or a manufacturer's Product Formulation Statement, but not all three documents)
- As needed, medical statements (signed by a State licensed healthcare professional) supporting meal modifications for children with disabilities, when modifications do not meet the Program meal pattern requirements ((Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs (SP 59-2016) and Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs (SP 32 CACFP 13 SFSP 15-2015)).

The SA should grant the SFA sufficient time to gather and return the requested documentation to the SA for review prior to the scheduled on-site visit.

The nutrient analysis must be conducted on each offered menu type for each age/grade group for a week from the review period for the targeted menu review school only; an aggregated, district-wide analysis cannot be accurately validated. The SA must verify the nutrient analysis protocols are followed as detailed in FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

On-site Review Procedures

During the on-site portion of the Administrative Review, the SA will have the opportunity to examine menu documentation with the SFA and clarify any questions.

The SA must use the *Dietary Specifications Assessment Tool* on-site as this will help identify areas where the SA can provide targeted technical assistance and respond to Questions 603-605 of the *On-site Assessment Tool*. The SA must request corrective action and/or assess fiscal

action as appropriate.

The nutrient analysis must be validated in order for the SA to close the Administrative Review. If the SA is unable to validate the nutrient analysis before the SA sends the Administrative Review Report to the SFA, the SA must advise the SFA that the review remains open until the nutrient analysis can be validated.

Option 3: Conduct Nutrient Analysis

Off-site Review Procedures

If the SA chooses Option 3, the SA must conduct a nutrient analysis using USDA-approved nutrient analysis software. The SA is encouraged to begin conducting nutrient analysis activities (e.g., collecting menu documentation, data entry) prior to the on-site review, but it is not required. Completing some, or all, of this work in advance allows for more time on-site to provide targeted technical assistance.

The SA will proceed to the *Nutrient Analysis and Validation Checklist*, which provides a detailed checklist for conducting a nutrient analysis. The SA must request at least one week of menu documentation for breakfast and lunch to conduct the nutrient analysis, including, but not limited to:

- Menus
- Production records (detailing what was offered to students)
- Standardized recipes
- Nutrition information
- Information about how the products contribute toward meal pattern requirements (often in the form of a CN Label or a product formulation statement, but not both.)
- As needed, medical statements (signed by a State licensed healthcare professional) supporting meal modifications for students with disabilities, when modifications do not meet the Program meal pattern requirements (*Policy Memorandum on Modifications to*

*Accommodate Disabilities in the School Meal Programs (*SP 59-2016) and *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs (*SP 32 CACFP 13 SFSP 15-2015)).

The SA should grant the SFA sufficient time to gather and return the requested documentation to the SA for review prior to the scheduled on-site visit.

The nutrient analyses for breakfast and lunch must be conducted on each menu type offered to each age/grade group in the targeted menu review school only. The SA must follow the nutrient analysis protocols as detailed in FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's School Meals Programs*.

On-site Review Procedures

During the on-site portion of the Administrative Review, the SA will have the opportunity to examine menu documentation with the SFA and clarify any questions.

The SA must complete the *Dietary Specifications Assessment Tool* on-site as this will help identify areas where the SA can provide targeted technical assistance and respond to questions 603-605 of the *On-site Assessment Tool*. The SA must request corrective action and/or assess fiscal action as appropriate.

The nutrient analysis must be complete in order for the SA to close the Administrative Review. If the SA is unable to complete the nutrient analysis before the SA sends the Administrative Review Report to the SFA, the SA must advise the SFA that the review will remain open until the nutrient analysis is complete.

For detailed instructions on conducting a weighted nutrient analysis using USDA-approved software, refer to the FNS's *Nutrient Analysis Protocols: How to Analyze Menus for USDA's*

School Meals Programs.

Option 4: Use FNS-approved Process Utilizing FNS-Approved Menu Planning Tools

The SA may propose an alternate method of assessing whether meals are compliant with the Dietary Specifications using the USDA-approved *Menu Planning Tools for Certification for Six Cent Reimbursement*. The proposed methodology must include a review of food purchasing, menu planning, meal preparation, and the meal service, and must incorporate the regulatory requirement to conduct a nutrient analysis. FNS approval of any alternate method is required prior to its use during an Administrative Review. For additional information, please see FNS Memorandum, SP 46-2013, *School Nutrition Program Administrative Reviews: Assessing Compliance with Dietary Specifications Using a USDA-Approved Menu Planning Tool for Certification for Six Cent Reimbursement*, available on FNS PartnerWeb.

Note: Under Section 747(b) of the Appropriations Act, Sodium Target 1 (as defined in 7 CFR 210.10(f)(3) and 220.9(f)(3)) remains in place for SY 2017-2018. Schools that meet Sodium Target 1 are in compliance with the regulatory sodium limits. For additional information, see SP 32-2017, *School Meal Flexibilities for School Year 2017-2018*.

NOTE: Assessing Compliance with Zero Trans Fat Requirement

During the on-site review, the SA must review manufacturers' food labels and packaging to ensure that foods offered in reimbursable school meals contain zero grams of *trans* fat per serving. A minimal amount of naturally occurring *trans* fat — found in products such as beef, lamb, and dairy products made with whole milk — permitted. If there is *trans* fat listed on the Nutrition Facts Label of a product containing meat or dairy, the SFA should request documentation from the manufacturer that reports the source of the *trans* fat in the product.

Technical Assistance/Corrective Action

When the SA conducts an Administrative Review and finds that the school is not meeting the Dietary Specifications requirements for calories, saturated fat, sodium, or *trans* fat (as specified in 7 CFR 210.10 (f) and 7 CFR 220.8(f)), technical assistance is provided and corrective action is required. SAs and SFAs must develop a Corrective Action Plan with specific steps and reasonable timelines to bring the SFA into compliance (as required in 7 CFR 210.10(h) and 7 CFR 220.8(h)). The Corrective Action Plan will vary depending on the nature of the changes necessary.

The SA may accept corrective action during the review, or — if the school cannot immediately implement the corrective action — the SA can require it as part of a Corrective Action Plan.

If the SA implements and verifies immediate corrective action during the on-site portion of the Administrative Review, the new practice should be included in the nutrient analysis. For example, if the SA identifies high sodium items on the salad bar, and then the SFA eliminates those items immediately, the SA would not include the high sodium salad bar items in the nutrient analysis.

If no immediate corrective action takes place, the SA must include current practices in the nutrient analysis. For example, if the SFA cannot immediately eliminate high sodium items on the salad bar, but will work with their vendor in order to correct this in the future, the SA must include the high sodium items in the nutrient analysis.

Recording Errors

Errors related to the Dietary Specifications are recorded on Questions 603 and 605 of the *On-site Assessment Tool.*

SFA Fails to Submit Documentation Necessary to Complete Review

If the SFA fails to submit the menu documentation required to complete this section of the Administrative Review, and program compliance cannot be satisfactorily verified by the SA, withholding of program payments would be appropriate (7 CFR 210.24). Refer to Section VIII, *Overview of Fiscal Action*, Module: *Withholding Payments,* Discretionary Withholding. **However, for this specific scenario, SAs are required to consult their respective Regional Office.**

Example:

Review period: March

Day of Review: April

Non-compliance with the meal pattern requirements is identified for March. The SFA implements corrective action in May.

The reviewer conducts a nutrient analysis for a menu week in May, and finds repeated Dietary Specifications violations. Fiscal action may be assessed as follows:

- If May is a closed claim for reimbursement, fiscal action will be assessed with the review period (i.e., March claim).
- If May is an open claim for reimbursement, fiscal action will be assessed with the Day of Review (i.e., April claim).

Fiscal Action

7 CFR 210.18(l)(2) gives SAs discretion to apply fiscal action for repeated violations involving calories, saturated fat, sodium, and/or *trans* fat, provided that:

- The SA has given technical assistance
- The SA has previously required and monitored corrective action
- The SFA remains noncompliant with the meal requirements established in 7 CFR parts 210 or 220

If, upon repeated violations, the SA exercises discretion to take fiscal action for Dietary Specifications violations, all meals for the entire week may be disallowed/reclaimed, if applicable. Fiscal action is limited to the school selected for the targeted menu review. A nutrient analysis using USDA-approved software is required to justify any fiscal action that may be required due to noncompliance with

Dietary Specifications requirements. Errors should be recorded under the "Other (Repeat Only)" section of *the School Data and Meal Pattern Error Form*, S-1, Line 16A.

If, upon repeated violations, the week subjected to fiscal action is outside the review period, proceed as follows:

- If the nutrient analysis week for which fiscal action is being assessed is from a closed Claim for Reimbursement, record all data for each month on the appropriate forms and workbooks (e.g., S-1, fiscal action workbook) under Review Period.
- If the nutrient analysis week for which fiscal action is being assessed is from an open Claim for Reimbursement, record all data for each month on the appropriate forms and workbooks (e.g., S-1, fiscal action workbook) under Day of Review.

Performance-based Certification Funding (6 cents)

If the Administrative Review finds that significant noncompliance exists that requires the SFA to develop and implement a Corrective Action Plan over an extended period of time (e.g., problems that cannot be fixed immediately), the SA must use its best judgment to assess the longevity and severity of the problems. If the SA determines that the performance-based reimbursement should be terminated, it should be terminated beginning the month following the on-site Administrative Review and, at SA discretion, for the month of review. Previously paid performance-based reimbursement would only be recovered in circumstances of clearly egregious or willful noncompliance by an SFA.

Performance-based reimbursement may resume beginning in the first full month the SFA demonstrates to the satisfaction of the SA that corrective action has taken place.

When the performance-based reimbursement is terminated, and the SFA operates both NSLP and the Seamless Summer Option, refer to Section VIII, *Overview of Fiscal Action*, Module: *Duration of Fiscal Action*, Performance-based Reimbursement.

Addendum: Certifying a School Food Authority for Performance-Based Reimbursement During an Administrative Review

Intent/Scope of Monitoring

SFAs that are not certified to receive the performance-based reimbursement must be assessed for certification during an Administrative Review. This method of certification permits State agencies to conduct menu review activities that satisfy both performance-based certification and Administrative Review requirements.

Review Procedures

Certifying a SFA for performance-based reimbursement during an Administrative Review requires the SA to:

(1) Select schools for review representing all menu types in the SFA, and
(2) Conduct a weighted nutrient analysis for each menu type offered in the SFA (breakfast and lunch) to ensure that meals offered comply with dietary specifications requirements.

Aside from these two requirements, the Administrative Review activities outlined in this manual are sufficient to certify an SFA as eligible to receive the performance-based reimbursement.

Site Selection

To select review schools, SAs conducting certification during an Administrative Review must:

1. Determine and select the minimum number of schools in the SFA based on the school selection procedures under 7 CFR 210.18(e)(1) and (2);
2. Identify the different menu types offered in the schools selected for review;
3. Categorize the schools by menu type (e.g., Pre-K, K-5, 6-8, 9-12); and
4. Ensure the selected schools for review cover each menu type in the SFA.

If the site selection steps above do not result in the selection of each of the menu types offered by the SFA, the SA must repeat the school selection process outlined above until all menu types are represented in the schools selected for review. When SAs are required to repeat the school selection process, the minimum number of schools to review may be maintained by replacing a school with one that meets the school selection criteria. However, the SA must ensure all the menu types are represented correctly (i.e., the required selection criteria in 7 CFR 210.18(e)(2) and all menu types must be represented in the schools selected for review).

Weighted Nutrient Analysis

On-site certification requires the SA to conduct a weighted nutrient analysis for each menu type offered in the SFA (breakfast and lunch). For more information concerning the procedures for certifying a SFA during an Administrative Review, refer to FNS Memorandum, SP 26-2014, *New Questions and Answers Related to the Certification of Compliance with Meal Requirements for the National School Lunch Program*, available on the FNS PartnerWeb.

Note: The procedures outlined in the Dietary Specifications and Nutrient Analysis module (except fiscal action) will not be followed when certifying a SFA during an Administrative Review.

Technical Assistance/Corrective Action

When the SA conducts certification activities during an Administrative Review and finds that the SFA is not meeting meal pattern and/or dietary specifications requirements, technical assistance and corrective action are the first steps that must be taken. SAs and SFAs should

develop a Corrective Action Plan with specific steps and reasonable timelines for bringing the SFA into compliance. The Corrective Action Plan will vary depending on the nature of the changes necessary.

Notifying the SFA of Certification Status

If the SA determines the SFA is eligible to receive the performance-based reimbursement, the SA must notify the SFA of its certification status and when the performance-based reimbursement will be initiated.

If the SA is unable to certify the SFA due to noncompliance, the SA must provide technical assistance and require corrective action. The SFA may be certified when corrective action is completed. At the exit conference, the SA must ensure the SFA understands future steps that must be taken to become certified to receive the performance-based reimbursement.

Fiscal Action

Fiscal action must be assessed for any noncompliance found during certification and Administrative Review activities. See the *Meal Components and Quantities* and *Dietary Specifications and Nutrient Analysis* modules for additional details on how to assess fiscal action.

Section IV: Resource Management

Modules contained within this Section include:

- Risk Assessment for Resource Management
- Maintenance of the Nonprofit School Food Service Account
- Paid Lunch Equity
- Revenue from Nonprogram Foods
- Indirect Costs

Module: Risk Assessment for Resource Management

Intent/Scope of Monitoring

The intent and scope of monitoring in this section is to apply a systematic approach to ensuring the overall financial health of an SFA's nonprofit school food service. This Section consists of a review of four areas integral to the financial health of the SFA's school food service. The SA may always supplement the review activity to include additional areas. The monitoring areas are:

- *Maintenance of the Nonprofit School Food Service Account*

  The SA must ensure that revenues and expenses* under the nonprofit school food service account are in accordance with 7 CFR 210.14. The nonprofit school food service expenses must be allowable — used only for the operation and improvement of the school food service — and net cash resources may not exceed three months' average operating expenses. (7 CFR 210.14)

  ***Note:** In assessing compliance with the Net Cash Resource's provision FNS has chosen to use the word "expenditure" for consistency with Federal regulations. In all other areas of the Resource Management (RM) Section FNS has chosen to use the word "expenses".*

- *Paid Lunch Equity*

  The SA must ensure that SFAs comply with the requirements for pricing paid lunches. (7 CFR 210.14(e))

- *Revenue from Nonprogram Foods*

  The SA must ensure that SFAs comply with the requirement that *revenues from the sale* of nonprogram foods generate at least the same proportion of total school food service

account revenues that *expenses from the purchase* of nonprogram foods contribute to total school food service account food costs. (7 CFR 210.14(f))

In addition, the SFA must price adult meals so that adult payments are sufficient to cover the overall cost of meals, including the value of any USDA Foods used in the production of adult meals. (FNS Instruction 782-5 REV. 1)

- *Indirect Costs*

  The SA must ensure that SFAs follow fair and consistent methodologies to identify and allocate allowable indirect costs to school food service accounts. (2 CFR 225)

Why use a Risk Indicator Tool?

The purpose of the *Resource Management Risk Indicator Tool* is to forecast and/or assess, through the use of known indicators, situations that may result in noncompliance.

Using a balanced review approach to monitor a SFA's resource management practices ensures that potential problems are identified while limited resources can be focused on those SFAs most at risk of noncompliance. The *Off-site Assessment Tool's* resource management section and the *Resource Management Risk Indicator Tool* are designed to help SAs target technical assistance and corrective action to those SFAs that demonstrate an increased risk of potential noncompliance and/or noncompliance with resource management requirements.

Review Procedures

Pre-visit Review Procedures

Off-site Assessment

Questions 700-712 in the *Off-site Assessment Tool* focus on the following areas: maintenance of the nonprofit school food service account, paid lunch equity, revenue from nonprogram foods, and indirect costs.

The information derived from the *Off-site Assessment Tool* will be added into the *Resource Management Risk Indicator Tool* by the SA. The Resource Management risk assessment procedures for SAs that will conduct RM comprehensive reviews at the SFA during the regular on-site Administrative Review are as follows:

The Resource Management Risk Indicator Tool

Identifies which SFAs are at risk for problems in resource management.

- Prior to the date of the on-site Administrative Review, the SA must collect the SFA's answers to the Resource Management questions 700-712 in the Off-site Assessment Tool electronically, via a hard copy of the form or verbally as part of a conversation with the SFA.
- After collecting the information, the SA must determine, by inputting the SFA's RM information into the RM Risk Indicator Tool, whether a comprehensive review of one or more of the four RM areas is necessary;
- When Resource Management comprehensive reviews are conducted on-site all RM risk assessments must occur off-site prior to the SA's on-site review of Resource Management. The State agency has the discretion to determine how far in advance of an SFA's on-site review the SA reviewer must conduct the off-site RM risk assessment.

The RM risk assessment procedures are generally the same as above for SAs that conduct required RM comprehensive reviews off-site and those that conduct the reviews separately from the rest of the on-site Administrative Review. In these instances, however, because the on-site Administrative Review does not include the monitoring of RM (since the review of this area is taking place at another time or off-site), it is not necessary to conduct the off-site RM risk assessment prior to the on-site review of the other Administrative Review areas. SAs must still gather information electronically, via hard copy or verbally from the SFA off-site to ensure they have the data they need to complete the RM Risk Indicator Tool and determine if a comprehensive RM review of one or more of the four areas is necessary. If a comprehensive review of any area(s) is required the State agency may conduct the review off-site.

The Resource Management Risk Indicator Tool identifies which SFAs potentially need further review or are at risk for noncompliance in the resource management areas. The Tool is expected to lead to a more targeted review that will ultimately provide for streamlined, consistent, and effective management of program resources at the SFA level. Information provided by the SFA for the *Off-site Assessment Tool* and *Resource Management Risk Indicator Tool* should be based on the SFA's most recently completed school year unless otherwise indicated. In general, the Resource Management review period examined should be consistent throughout the review of the Resource Management Section. State agencies have the discretion to review an SFA's documentation from both the Resource Management Review Period or the current School Year, but must document the time period used in the RM Comprehensive Review Form if different from the RM Review Period/previous school year. For instance, a SA conducting a RM comprehensive review of PLE after the SFA's school board approved a new paid lunch price for the next school year may choose to review the SFA's PLE Tool for the prior school year and its most recently completed PLE tool. As a best practice, SAs should collect the information for the *Off-site Assessment Tool* from the SFA as part of an interactive discussion to ensure that the SFA fully understands the questions so that it can provide accurate information. If at any time the SA is concerned that any of the information provided by the SFA in the *Off-site Assessment Tool* is inaccurate, the SA must follow up with the SFA to ensure that the SFA understands the questions correctly and provides accurate answers.

Reviewer Tip

As early as possible in the program year (e.g., July – September) send the Resource Management portion of the *Off-site Assessment Tool* to all SFAs scheduled for review in the coming school year.

Conducting an Administrative Review of a new SFA in its first year of operation provides an opportunity for an SA to ensure that the new SFA has a solid financial accounting system and sound practices in place. When reviewing a new SFA, the SA should not complete the *Resource Management Risk Indictor Tool*. Instead, the SA must use the Resource Management section of

the *On-site Assessment Tool* to document the SFA's policies and procedures in each of the four Resource Management compliance areas: maintenance of the nonprofit school food service account (including allowable costs and net cash resources), paid lunch equity, revenue from nonprogram foods, and indirect costs. During the on-site review of a new SFA's resource management policies and procedures, the SA reviewer should document any findings needing corrective action and/or technical assistance in the *On-site Assessment Tool*.

Using the Resource Management Risk Indicator Tool

While the *Resource Management Risk Indicator Tool* is designed to assess potential risk, it is not intended to be a comprehensive evaluation. Additional evaluation is required to determine whether problems actually exist.

The Tool includes four Resource Management areas integral to the financial health of the SFA school food service: Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs. At least one question is asked under each Resource Management area; some areas contain multiple questions that may indicate risk (risk indicators). See the modules under this section for more information about the resource management comprehensive review. It is important to note that not all of the questions associated with the risk indicators are intended to imply that the related activity is prohibited; rather, they merely reflect the possibility of a need for further review.

Review Procedures for SFAs receiving risk indicators in one or more Resource Management areas: If an SFA receives one or more risk indicators in one of the four Resource Management areas, the State agency must conduct a comprehensive review of the RM area in which the risk indicator(s) was received using the *Resource Management Comprehensive Review Tool*. If an SFA receives one or more risk indicators in more than one Resource Management area, the SA must conduct a comprehensive RM review of each RM area in which a risk indicator was assessed. For instance, if an SFA receives one risk indicator under the Maintenance of the Nonprofit School Food Service RM area and one risk indicator under the Revenue from

Nonprogram Foods RM area, the SA must conduct a comprehensive review of the Maintenance of the Nonprofit School Food Service RM area and a comprehensive review of the Revenue from Nonprogram Foods RM area. The SA must only perform a comprehensive review of all four Resource Management areas if the SFA receives one or more risk indicators in all of the four RM areas or if the Resource Management Risk Indicator Tool was not completed off-site prior to the Resource Management review If a SA has concerns about an SFA's financial management practices, FNS strongly encourages the SA to conduct a comprehensive review of one or more Resource Management areas. The SA has the discretion to conduct a comprehensive Resource Management review of any or all RM areas even if no risk indicators were triggered during the off-site assessment.

Comprehensive Resource Management reviews for all four RM areas may occur on-site or off-site. If the State agency reviewer wishes to conduct an off-site comprehensive review, the reviewer must be able to secure off-site from the SFA all financial documents needed to sufficiently assess the SFA's compliance with the RM requirements. Some RM areas, such as the Maintenance of the Nonprofit School Food Service Account and Revenue from Nonprogram Foods areas, require a review of invoices and other documentation which may take some time for the SFA to gather. For this reason, State agencies are strongly encouraged to secure the SFA's *Off-site Assessment Tool* and complete the Resource Management Risk Indicator Tool at the beginning of the school year (e.g., July-September) in which an SFA's Administrative Review AR will occur. This will provide sufficient time to the SFA to gather and provide any needed financial documentation the SA may need to conduct some or all of the RM review off-site.

FNS strongly encourages SAs to include the SA financial management staff in the analysis of the completed Resource Management portion of the *Off-site Assessment Tool* and the *Resource Management Risk Indicator Tool*. If necessary, SA financial management staff should also be included during the course of any resource management comprehensive review.

Areas of Risk

Off-site Assessment Tool questions included under each of the four Resource Management areas – Maintenance of the Nonprofit School Food Service Account, Paid Lunch Equity, Revenue from Nonprogram Foods, and Indirect Costs are identified below.

1) Maintenance of the Nonprofit School Food Service Account

Off-site Assessment Tool Questions

700) Did the SFA have the ability to accurately track all revenues and expenses transferred in and out of the nonprofit school food service account? (YES/NO)

701) Did the SFA have a fund balance in excess of three months average expenditures? (YES/NO/Yes, but the excess fund balance has been approved by the SA.)

702) Did the SFA transfer funds other than approved indirect costs out of the nonprofit school food service account to support the General Fund or for other non food service-related expenses? (YES/NO)

703) If the SFA purchased equipment costing $5,000 or more during the previous school year, did it receive prior approval from the State agency either directly or via the State's pre-approved equipment list? (YES/NO/NA)

704) Did the SFA have any financial findings related to the child nutrition programs on previous administrative reviews, A-133, OIG, or other state audits within the past three years? (YES/NO)

705) Did the SFA have internal control procedures in place to ensure that only allowable costs were charged to the nonprofit school food service account? (YES/NO)

Risk Indicators

The SA will conduct a comprehensive review of the SFA's maintenance of the nonprofit school food service account if any one of the following is found:

- The SFA did not have the ability to accurately track all revenues and expenses transferred in and out of the nonprofit school food service account;
- The SFA had a fund balance in excess of three months average expenditures and the balance has not been approved by the SA;

- If the SFA transferred funds out of the nonprofit school food service account to support other school operations.
- The SFA made equipment purchases that were $5,000 or above without first obtaining prior approval from the State agency;

- The SFA received a financial finding related to the Child Nutrition Programs on an Administrative Review, Coordinated Review Effort or audit, including the A-133, OIG, or other State audits, within the past three years;

- The SFA did not have sufficient internal controls in place to ensure that only allowable costs are charged to the nonprofit school food service account.

2) Paid Lunch Equity

Off-site Assessment Tool Questions

706) Did the SFA use the USDA Paid Lunch Equity Tool or a comparable mechanism to evaluate the need to raise its paid lunch prices? (YES/NO/NA, SFA is an RCCI or otherwise does not charge for lunches at any sites within the SFA)

If a comparable mechanism was used, explain which mechanism was used to address the required raise in prices. Provide detail on how much the SFA raised its paid lunch prices and/or how much in non-Federal funds the SFA transferred into its nonprofit school food service account to comply with the PLE requirements.

707) Did the SFA use non-Federal funds to support its paid lunch prices? (YES/NO/NA, SFA is an RCCI or otherwise does not charge for lunches at any sites within the SFA)

708) Did the SFA increase its paid lunch prices at the level required by the USDA Paid LunchEquity tool or comparable mechanism? (YES/NO/NA, SFA is an RCCI or otherwise does not charge for lunches at any sites within the SFA / No, the SFA received a PLE exception from the State during the RM review period.)

Risk Indicators

The SA will conduct a comprehensive review of the SFA's Paid Lunch Equity practices if the SFA:

- Did not use the USDA Paid Lunch Equity Tool or comparable mechanism to evaluate its paid lunch prices;

- Used non-Federal funds to support its paid lunch prices;
- Did not increase its paid lunch prices if the Paid Lunch Equity Tool or comparable mechanism indicated an increase in its paid lunch prices was required **or did not explain the process and mechanism that was used to increase paid lunch prices if required to do so.**

3) Revenue from Nonprogram Foods

Off-site Assessment Tool Questions

709) Did the SFA sell second meals, Smart Snacks, and/or catering (e.g., foods/beverages for school board meetings; foods for outside entities and programs)? (YES/NO/NA)

710) If the SFA provided adult meals for teachers and/or parents, did it charge and collect reimbursement from the adults receiving the meals or from the General Fund to cover the costs of the meals? (YES/NO/NA)

711) If the SFA charged for adult meals, were the meal prices charged in compliance with FNS Instruction 782-5, Rev. 1? (YES/NO/NA)

Risk Indicators

The SA will conduct a comprehensive review of Revenue from Nonprogram Foods if the SFA:

- Sold second entrees/items, Smart Snacks and/or catering;
- Provided adult meals for school staff and/or parents but did not collect reimbursement in full from the teachers and/or parents receiving the meals; and
- Did not charge adult meal prices in compliance with FNS Instruction 782-5, Rev. 1.

4) Indirect Costs

Off-site Assessment Tool Questions

712) Were indirect costs charged to the SFA's nonprofit school food service account? (YES/NO)

Risk Indicators

The SA will conduct a comprehensive review of indirect costs if the nonprofit school food service account was charged for indirect costs.

Technical Assistance/Corrective Action

FNS requires technical assistance and corrective action in all instances where the SA identifies violations of the resource management regulations or guidance. All documentation, including invoices and other materials needed to conduct a comprehensive review of allowable costs, may be gathered and reviewed off-site. However, SAs must assess their ability to secure the documentation they need to thoroughly conduct a comprehensive review of all areas receiving risk indicators. If the SFA is unable to provide all necessary resource management documentation in a timely manner to the State agency, the State agency must conduct an on-site comprehensive resource management review of any RM areas that received a risk indicator and for which efforts to obtain sufficient documentation to conduct an off-site review were unsuccessful. During the resource management assessment and review process, reviewers should refer to the *Resource Management Comprehensive Review Tool* for further guidance and instructions for how to assess a SFA's compliance and need for technical assistance concerning Federal resource management requirements.

FNS encourages the SA to conduct a follow-up review for repeated instances of resource management noncompliance. Needed corrective action and/or technical assistance must be recorded in the applicable comments section of the *Off-site Assessment Tool, On-site Assessment Tool,* or *Resource Management Comprehensive Review Form*.

Resource Management Comprehensive Review

The *Resource Management Comprehensive Review Form* must be used when conducting a comprehensive review of SFAs that receive one or more risk indicators within one of the four resource management areas. The scope of the resource management comprehensive review is described in greater detail for each Resource Management area in the modules in this section. Information provided by the SFA for the resource management comprehensive review should be based on the SFA's most recently completed school year- the Resource Management review period - unless otherwise indicated. The time period chosen should be consistent throughout the review of the Resource Management Section. As indicated previously, any findings identified during the course of the Resource Management review, even if corrected by the SFA during the course of the RM review, must be followed up with corrective action and technical assistance for the entire RM review period (previous school year) and administrative review period (current school year). If necessary, corrective action must include the SFA's adoption of internal controls to ensure noncompliance does not occur in the future. If noncompliance is identified during the RM review period, State agencies have discretion to examine financial documents from the current school year to determine if additional corrective action is necessary. Refer to the modules that follow for more information.

Fiscal Action

This is a General Area, thus fiscal action is not required. In some instances, such as the expenditure of nonprofit school food service monies on unallowable costs or "double dipping" when indirect costs are charged, the SA must withhold funds or the LEA must otherwise reimburse the nonprofit school food service account in full to cover the amount of funds misspent and/or overcharged to the account. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Comprehensive Review – Maintenance of the Nonprofit School Food Service Account

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices and may be used in whole or in part to assess compliance and/or the need for technical assistance concerning individual risk indicators triggered during a SFA's Resource Management risk assessment. When conducting a review of the maintenance of the nonprofit school food service account, the SA must assess an SFA's risk of noncompliance with the provisions of 7 CFR 210.2, 210.14(a), 210.14(b), and 210.19(a)(1), which address the maintenance of the nonprofit school food service account.

This Module focuses on ensuring the SFA is maintaining and using its nonprofit school food service account according to regulatory requirements, which include observing the limitation on the use of the nonprofit school food service account revenues set forth in 7 CFR 210.14, and ensuring related costs are necessary, reasonable, and allocable set forth in 2 CFR 225. SA monitoring of this area is intended to ensure that SFAs:

- Use all **nonprofit school food service revenue** solely for the operation or improvement of the school food service:
    - Revenues may be used for food, equipment, and labor to operate the meal program; and
    - Revenues must not be used to purchase land and/or buildings, or to construct buildings, unless approved by FNS.
- Limit **net cash resources** to three months' average expenditures, or have a process or SA approved plan for spending the amount in excess of 3 months. Limiting the size of a SFA's food service net cash resources ensures that funds in the nonprofit school food service account are expended to improve program operations and meal quality.

- Comply with **allowable cost** restrictions, limiting expenses of nonprofit school food service funds to those costs that are necessary, reasonable, and allocable.
- Adequately document loans the LEA may have provided to the SFA's nonprofit school food service account for the purpose of resolving a budget shortfall in the school food service account.

This section of review falls under the General Areas.

Review Procedures

The SA has the flexibility to review all aspects of the maintenance of the nonprofit school food service account off-site if the SA is able to secure all of the financial documentation needed to assess the SFA's compliance in this area. The *Maintenance of the Nonprofit School Food Service Account* section of the *Resource Management Comprehensive Review Form* is used when conducting a comprehensive review of this Module. To answer the questions on the review form, the SA must obtain documentation that may include, but is not limited to, the Statement of Revenues and Expenses, a general ledger, or other similar documents. The SA must assess the information in accordance with the guidance below.

Documents for the Resource Management comprehensive review are taken from the most recently completed school year (RM review period) unless otherwise noted by the State agency

<u>Nonprofit School Food Service and Net Cash Resources:</u>

The SFA must follow and document an annual process to identify revenue excess or shortfall (i.e., net cash resources). To monitor compliance, the SA should use the SFA's Statement of Revenue and Expenses from the most recently completed selected year to identify the following:

Fund Balance or Carryover + Total Revenues – Total Expenses = Net Cash Resources

Additionally, a sample Statement of Revenue and Expenses is provided to help the SA perform the calculations in the steps below. Please note this is just a **sample** and may not reflect all categories that typically would appear on a Statement of Revenue and Expenses:

*******SAMPLE*******

Statement of Revenues and Expenses, Budget and Actual, Year Ended June 30, 2016

	Adopted	Final	Actual	Final Budget
Revenues				
Local Sources:				
Charges for services	$ 655,000	$ 655,000	$ 564,694	$ (90,306)
Earnings on investments	2,000	2,000	2,278	278
Other	25,000	25,000	28,711	3,711
State sources	51,000	51,000	70,729	19,729
Federal sources	4,357,250	4,357,250	4,569,710	212,460
Total revenues	5,090,250	5,090,250	5,236,122 (Step 1)	145,872
Expenditures				
Current operating:				
Enterprise and community services	$ 5,490,250	$ 5,690,250	$ 5,570,671	$ 119,579
Total current expenditures	5,490,250	5,690,250	5,570,671	$ 119,579
Contingency	200,000			
Total expenditures	5,690,250	5,690,250	5,570,671 (Step 2)	119,579
Net change in fund balances	(600,000)	(600,000)	(334,549) (Step 3)	265,451

- *Step 1 — Total Nonprofit Food Service Current Revenue*: Determine the SFA's available revenues based on the selected year. The SA must identify all monies received by or accruing to the nonprofit school food service account, including but not limited to meal payments, earnings on investments, other local revenues, State revenues (i.e., reimbursements and State match), and Federal cash reimbursements. This information should be available on the Statement of Revenue and Expenses, the general ledger, or other similar document. SFAs that commingle their nonprofit school food service

account with other school accounts must provide the SA with sufficient information to identify all revenue available to the school food service.

- *Step 2 — Total Current Expenses:* Determine payments owed/total expenses incurred in the operation or improvement of the nonprofit food service program. SFAs that commingle their nonprofit school food service account with other school accounts must provide the SA with sufficient information to identify all expenses charged to the school food service.

- *Step 3 — Net Cash Resources:* Calculate the SFA's net cash resources using the values from Step 1 and Step 2:

Step 1 (Total Current Revenue) - Step 2 (Total Current Expenses) = Step 3 (Net Cash Resources)

- *Step 4 — Identify the SFA's Three Months' Average Expenditures*: Using the Statement of Revenue and Expenses or comparable documentation, the SA must convert the annual expenses to average monthly expenses by dividing a full year's total expenses by the number of full school months (typically September-May or 9 months) and multiply by 3 months as follows:

  Step A:
  Full year's expenses ÷ Number of full school months = 1 month average expenses
  Step B:
  1 month average expenses x 3 = SFA three (3) months' average expenses

Note: **<u>State agencies may use an alternative calculation to determine the SFA's average monthly expenses</u>**.

- *Step 5 — Determine the SFA's Compliance with Net Cash Resources Requirements in 7 CFR 210:*
    - If the annual net cash resources amount (see Statement of Revenue and Expenses above) is less than the three months' average expenditure amount as determined above, the SFA is in compliance.
    - If the annual net cash resources amount is higher than three months' average expenditures, then the SFA is not in compliance unless approval has been given by the SA to the SFA.

Allowable Costs:

On-site Review Procedures:

The SA must evaluate the SFA's compliance with allowable cost restrictions during the Maintenance of the Nonprofit School Food Service comprehensive review through the following activities:

- *Step 1* —eview the SFA's year-end Statement of Revenue and Expenses for the nonprofit school food service account to determine whether general expenses appear to be reasonable, necessary, and allocable. For an extensive list of allowable and unallowable costs, SAs should refer to 2 CFR Part 200, Subpart E.
    - A reasonable cost must follow State and Federal regulations and must follow restraints imposed by generally accepted sound business practices. For example, as a best practice, reasonable costs should follow an "arms-length" standard, meaning programs costs should be in line with the price that the item or service would cost on the open market. Costs must be assigned to the programs, functions, and activities that benefited from the SFA having incurred the cost. All costs must be adequately documented and treated consistently as direct or indirect.

- Costs that are not reasonable and necessary for program purposes or that do not otherwise satisfy Federal cost principles and program regulations are unallowable.
- Costs that would otherwise be allowable may be made unallowable by the action or inaction of the SFA. For example, if a SFA purchases kitchen equipment without following a competitive procurement process or prior approval from the State agency, then that cost becomes unallowable because the SFA failed to follow required procurement procedures. No portion of an unallowable cost may be charged to the program.

- *Step 2 — Review a Sample of Expenses:* Select a sample of expenses from the detailed general ledger report for the RM review period to determine whether the recorded expenses represent an activity or function recognized as reasonable and necessary for the operations of the programs. If the detailed general ledger fails to provide sufficient information needed to identify expenses, a review of invoices and receipts for the selected year may provide this information. To conduct a sample of the SFA's expenses, the SA must perform the following steps:
  - Conduct an assessment of approximately 10% of the expenses in the detailed general ledger. The sample may be conducted as follows:
    - Review a minimum of 10% of salaries and benefits for the year **or** all salaries from a selected full month; ensure all employees paid are involved in the school meal programs and that they are only paid from the nonprofit school food service account for the hours they worked in the school food service.

    - Review a minimum of 10% of food, supplies and equipment for the year **or** all food, supplies, and equipment from a selected full month;

- Review a minimum of 10% of other expenses such as utilities (electric, water, gas, etc.), travel costs and/ or rental space (storage) for the year **or** all expenses from a selected full month.

Reviewer Tip

For more information about national averages for expenses and revenues and the nonprofit school food service account, please see the *USDA School Lunch and Breakfast Cost Study II*, published April 2008: http://www.fns.usda.gov/sites/default/files/MealCostStudy.pdf

While reviewing the sample of expenses, the SA reviewer should identify any expenses that appear to be unnecessary or incompatible with the operations of the school food service. For instance, if the reviewer identifies that the SFA made purchases of shrimp and roast beef, but neither item appear on the SFA's menu or identifies staff salaries charged for employees of the SFA's Food Service Management Company, additional follow-up should occur. The reviewer must interview SFA staff about any questionable items identified and request additional information, such as invoices to substantiate the expenses.

Technical Assistance/Corrective Action

When documenting corrective action, the reviewer must include information about the SFA's violation of Federal law, regulations, or applicable policy guidance, as well as information on the adjustments needed for the SFA to become compliant. Needed corrective action and/or technical assistance must be recorded in *Resource Management Comprehensive Review Form* when a Resource Management comprehensive review is conducted.

Corrective action and technical assistance should be taken for the entire RM review period (previous school year) and Administrative Review AR period (current school year), if necessary.

For example, if the SA finds that the SFA inappropriately spent nonprofit school food service funds on unallowable costs during the RM review period, corrective action will require a transfer of funds from the LEA's general fund into the nonprofit school food service account or require the LEA to otherwise reimburse the school food service for the unallowable expenses. The reviewer should ensure that the LEA reimburses the nonprofit school food service account if the same unallowable costs were charged to the nonprofit school food service account during the current school year. Corrective action should also include the adoption of internal controls to ensure noncompliance does not occur in the future.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Comprehensive Review Paid Lunch Equity

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices in the Paid Lunch Equity Resource Management area. When conducting a review of paid lunch equity, the SA must evaluate the prices the SFA charges for paid lunches in relation to the Federal paid and free reimbursement rates. To do so, SFAs must determine:

- the weighted minimum average paid lunch price charged for paid lunches in the previous school year
- the difference between the free lunch per meal reimbursement rate and the paid lunch per meal reimbursement rate in effect for the previous school year; this is also called the ''reimbursement difference''

If an SFA's weighted minimum average paid lunch price is equal to or greater than the reimbursement difference, the SFA is not required to make any adjustments in lunch prices or to add revenue to the nonprofit school food service account as long as it continues to charge a weighted minimum average paid lunch price that is not less than the amount of the reimbursement difference.

If an SFA's weighted minimum average paid lunch price is less than the reimbursement difference, the SFA must increase prices for paid lunches or add financial support from non-Federal sources to the school food service account. The paid lunch equity provision is found at 7 CFR 210.14(e).

Due to the complexity of calculations, FNS developed the *Paid Lunch Equity Tool* for SFAs to use in determining compliance with this provision. For more information, refer to 7 CFR 210.14(e) and FNS memorandums SP 39-2011 Revised, *Child Nutrition Reauthorization 2010: Guidance on*

Paid Lunch Equity and Revenue from Nonprogram Foods and SP 11-2017117 *Paid Lunch Equity: School Year 2017-201878 Calculations and Tool,* and SP 11-2017 Revised for the latest PLE Tool on the FNS PartnerWeb.

The intent in monitoring this provision is to ensure support for paid lunches is in compliance with section 205 of the Healthy, Hunger-Free Kids Act.

This area falls within the General Areas of the Administrative Review.

Review Procedures

The *Paid Lunch Equity* section of the *Resource Management Comprehensive Review Form* contains questions to assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.

The SA must compare the SFA's completed *Paid Lunch Equity Tool* to a State-completed *Paid Lunch Equity Tool* to verify the SFA's calculations, as follows:

1) Obtain the SFA's completed *Paid Lunch Equity Tool* or alternate documentation for the previous school year. Validate the SFA's Paid Lunch Equity calculations by cross-checking the data gathered with data used by the SFA.
   Results:
   a) If the SFA's *Paid Lunch Equity Tool* can be validated by the SA, skip to step four below.
   b) If the SFA's *Paid Lunch Equity Tool* cannot be validated by the SA, complete steps two and three below.

2) Complete a separate *Paid Lunch Equity Tool* using the following information gathered from source documents from the SFA:

- The weighted minimum average paid lunch price for paid lunches in SY 2010-2011 (start year of Paid Lunch Equity);
- All paid lunch prices for October of the previous school year;
- Number of paid lunches served and the prices charged for those meals served in October of the previous school year;
- Total paid lunches claimed in the second preceding school year (needed if using non-Federal funds).

3) Enter the SFA's data into a separate *Paid Lunch Equity Tool* to determine whether or not a paid lunch increase was necessary.

4) Determine if and how the SFA raised its paid lunch prices, if a price increase was required. If paid lunch prices were not raised, determine whether the SFA used non-Federal sources to support its paid lunch prices. If non-Federal funds were used to support paid lunch prices, the SA should determine whether the sources are allowable and appropriately recorded in the nonprofit school food service account.

For a detailed list of allowable and unallowable non-Federal sources, see 7 CFR 210.14(e).

Technical Assistance/Corrective Action

The SA must require the SFA to take corrective action if the SA finds that the SFA:

- incorrectly calculated the appropriate paid lunch price
- did not raise its paid lunch price if such an increase was necessary
- used unallowable non-Federal sources to support its paid lunch price
- did not transfer a sufficient amount of non-Federal funds into the SFA's nonprofit school food service account if the SFA did not raise its paid lunch prices

Given the complexity of this issue, FNS encourages SAs to provide on-site technical assistance. Needed corrective action and/or technical assistance must be recorded in the comments section of the *Off-site Assessment Tool* when a reviewer is assessing compliance outside of a Resource Management comprehensive review or in the *Resource Management Comprehensive Review Form* when a Resource Management comprehensive review is conducted. Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SFA should also adopt internal controls to ensure that noncompliance does not occur in the future.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Comprehensive Review – Revenue from Nonprogram Foods

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices. When conducting a review of revenue from nonprogram foods, the SA must assess whether the SFA took steps to ensure the *revenues from the sale of nonprogram foods* generate at least the same proportion of SFA revenues as *expenses from the purchase of nonprogram foods* contribute to the SFA's food costs. (7 CFR 210.14(f))

$$\frac{\text{Nonprogram food revenue}}{\text{Total program + nonprogram revenue}} \geq \frac{\text{Total nonprogram food cost}}{\text{Total program + nonprogram food cost}}$$

FNS defines "nonprogram foods" as those foods and beverages sold in a participating school other than reimbursable meals and meal supplements that are purchased using funds from the nonprofit school food service account. Nonprogram foods include a la carte items and adult meals. They also include items purchased with nonprofit school food service account funds for vending machines, fundraisers, school stores, and catered and vended meals.

Review Procedures

The *Revenue of Nonprogram Foods* section of the *Resource Management Comprehensive Review Form* provides review questions to assess the SFA's compliance with the nonprogram revenue requirements. The SA must assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.

The SA must:

1. Identify the categories of nonprogram food and beverages provided by the SFA.

2. Ensure that the SFA was reimbursed for food and beverages it may have purchased for internal or external entities (catering)

3. Review the price the SFA charges for adult meals to ensure that meals served to adults are priced sufficiently to cover the overall cost of the meals. The overall cost of the meals must include the value of any USDA Foods (entitlement and bonus). **Note**: For more information, refer to FNS Instruction 782-5 REV. 1*, Pricing of Adult Meals in the National School Lunch and School Breakfast Programs.*

4. Determine how the SFA assessed its compliance with the revenue from nonprogram food requirements in 7 CFR 210.14(f).

5. Determine if and how the SFA adequately addressed any shortfalls necessary due to insufficient revenues generated by the sale of nonprogram foods.

6. Determine if the SFA may be in compliance with the Revenue from Nonprogram Foods requirements despite not meeting the nonprogram food revenues/expenses ratio. This could occur if the SFA only sold a limited number of nonprogram foods (i.e., milk) that had an identifiable per-serving cost.

Technical Assistance/Corrective Action

Any violations of program requirements require corrective action. Corrective action and/or technical assistance are necessary if the SFA:

- Did not include all nonprogram food revenues and costs in its assessment calculation;
- Did not ensure specific nonprogram food revenues were transferred into its nonprofit school food service account;
- Priced adult meals below the cost of producing those meals;

- Did not assess its compliance with the Revenue from Nonprogram Foods requirements via either the Nonprogram Foods Tool or 5-Day Reference Period as described in FNS Policy Memo SP 20-2016;
- Did not take steps to adequately increase its nonprogram food revenues and/or secure general funds if out of compliance with the Revenue from Nonprogram Foods requirements.

Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SA should also require the SFA to adopt internal controls to ensure that noncompliance does not occur in the future. Needed corrective action and/or technical assistance must be recorded in the *Resource Management Comprehensive Review Form* when a resource management comprehensive review is conducted.

FNS recognizes there is wide variation in the capabilities of systems and mechanisms SFAs employ to maintain and monitor their compliance with the revenue from nonprogram foods requirements. In recognition of these potential difficulties and variations in system capabilities, FNS released FNS Policy Memorandum SP 06-2016, *Nonprofit School Food Service Account Nonprogram Food Revenue Requirements* to help SFAs and SAs better assess compliance with this requirement. Given the complexity of this issue, FNS encourages SAs to provide technical assistance in this area. Technical assistance may include identifying opportunities at the SFA level to increase the SFA's revenue from the sale of nonprogram foods.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the

specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Comprehensive Review Indirect Costs

Intent/Scope of Monitoring

This Module must be used to conduct a comprehensive review of the SFA's resource management practices. When conducting a review of indirect costs, the SA must evaluate charges to the nonprofit school food service account, including allowable direct and indirect costs.

Indirect costs are incurred for the benefit of multiple programs, functions, or other cost objectives, and therefore cannot be identified readily and specifically with a particular program or other cost objective. They typically support administrative overhead functions, such as fringe benefits, accounting, payroll, purchasing**,** facilities management, and utilities.

Charges for indirect costs are based on two factors:

- The indirect cost rate established for a specific fiscal year, and the corresponding direct cost base;
- A documented methodology that accurately allocates indirect costs.

In most cases, the indirect cost rate is in the indirect cost rate agreement negotiated and approved by the associated State Educational Agency. Indirect cost rate agreements expire annually and it is imperative that SFAs use the most current approved rate for each fiscal year. The direct cost base is the sum of allowable and unallowable costs that receives a benefit from the costs in the pool.

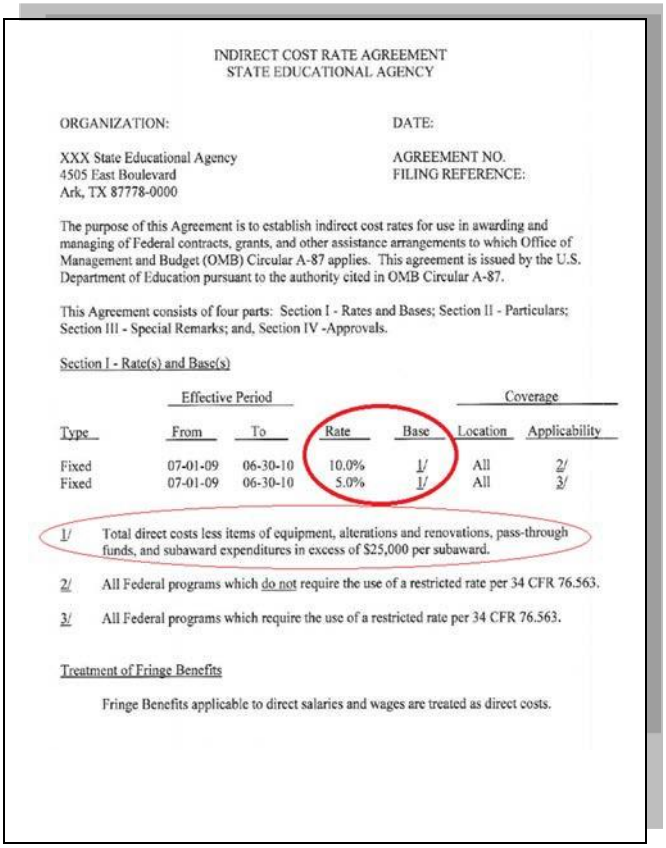
SAs must ensure that SFAs use the correct indirect cost rate and that the correct rate is applied to the correct direct cost base. For further information on indirect costs, the SA should refer to FNS' *Indirect Cost Guidance* (SP 41-2011, with attachments).

Note: The scope of monitoring may require the SA to assess how unit(s) of the LEA other than the school food service implement their indirect cost responsibilities, as applicable.

This section of review falls under the General Areas.

Review Procedures

The *Indirect Cost* section of the *Resource Management Comprehensive Review Form* contains questions to assess the information in accordance with the guidance below. The SA has the flexibility to cover this area either off-site or on-site.



INDIRECT COST RATE AGREEMENT
STATE EDUCATIONAL AGENCY

ORGANIZATION:

XXX State Educational Agency
4505 East Boulevard
Ark, TX 87778-0000

DATE:

AGREEMENT NO.
FILING REFERENCE:

The purpose of this Agreement is to establish indirect cost rates for use in awarding and managing of Federal contracts, grants, and other assistance arrangements to which Office of Management and Budget (OMB) Circular A-87 applies. This agreement is issued by the U.S. Department of Education pursuant to the authority cited in OMB Circular A-87.

This Agreement consists of four parts: Section I - Rates and Bases; Section II - Particulars; Section III - Special Remarks; and, Section IV -Approvals.

Section I - Rate(s) and Base(s)

	Effective Period				Coverage	
Type	From	To	Rate	Base	Location	Applicability
Fixed	07-01-09	06-30-10	10.0%	1/	All	2/
Fixed	07-01-09	06-30-10	5.0%	1/	All	3/

1/ Total direct costs less items of equipment, alterations and renovations, pass-through funds, and subaward expenditures in excess of $25,000 per subaward.

2/ All Federal programs which do not require the use of a restricted rate per 34 CFR 76.563.

3/ All Federal programs which require the use of a restricted rate per 34 CFR 76.563.

Treatment of Fringe Benefits

Fringe Benefits applicable to direct salaries and wages are treated as direct costs.

The SA must review the following information during the Administrative Review:

1. Indirect Cost Rate Agreement: Ensure that the SFA is using the approved indirect cost rate from the State Education Agency.

2. Use Correct Rate/Base: Ensure the indirect cost charged to the nonprofit school food service account is consistent with the approved indirect cost rate to the direct cost base found in the approved indirect cost rate agreement. See example above.

3. Accounting Consistency: Handling of indirect costs must be consistent in all activities of the SFA unless otherwise exempted. For example, if the nonprofit school food service

account is charged for electricity costs based on square footage, all other activities of the SFA must be similarly charged, as applicable.

4. Prior Year's Retroactive Billing: Confirm that the nonprofit school food service account was not charged for indirect costs that were previously paid from the general fund. It is unallowable to bill the school food service account for indirect costs unless an agreement exists to show that the SFA had been "loaned" the nonprofit school food service account funds to cover the indirect costs in one or more prior years with the expectation of repayment. In such cases, accounting records should support implementation of the loan agreement. For example, a transfer of funds from the general fund to the food service account might be recorded as a receivable (e.g., "Due from Food Service Fund").

5. Proper Classification of Costs (Direct/Indirect): Costs must be consistently treated as direct or indirect. Confirm that school food service accounts are not charged directly for expenses that are included in the indirect cost pool (double dipping).

6. Support Documents for Indirect Cost Billing: Verify the documentation that supports actual indirect costs charged to the school food service account. Check for mathematical errors and confirm that indirect costs were calculated based on the correct rate and the correct base.

Technical Assistance/Corrective Action

Needed corrective action and/or technical assistance must be recorded or in the *Resource Management Comprehensive Review Form* when a resource management comprehensive review is conducted. The SA must require the SFA to take corrective action if the SFA is out of compliance with any aspect of the RM review of indirect costs, including:

- the nonprofit school food service account was charged costs in excess of the approved indirect cost rate;
- the correct rate was applied to an incorrect direct cost base;
- indirect costs were not applied consistently;
- the nonprofit school food service account was charged directly for expenses that were included in the indirect cost pool (double dipping);
- sufficient documentation could not be provided to support the indirect costs charged to the nonprofit school food service account.

Corrective action must occur for the Resource Management review period and, if necessary, for the current school year. The SFA should also adopt internal controls to ensure that noncompliance does not occur in the future.

Needed corrective action and/or technical assistance must be recorded in the comments section of the *Resource Management Comprehensive Review Form*.

Fiscal Action

This is a General Area, thus fiscal action is not required. FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. While withholding program payments is not included in the specific regulatory definition for fiscal action, additional information can be found in Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Section V: General Program Compliance

Modules contained within this Section include:

- Civil Rights
- SFA On-site Monitoring
- Local School Wellness Policy and School Meal Environment
- Smart Snacks in School
- Professional Standards
- Water Availability
- Food Safety
- Reporting and Recordkeeping
- School Breakfast and Summer Food Service Programs Outreach

Module: General Area Civil Rights

Intent/Scope of Monitoring

FNS requires SFAs to administer program services and benefits in accordance with all laws, regulations, instructions, policies, and guidance related to nondiscrimination in program delivery.

This monitoring area falls under the General Areas of the Administrative Review.

Review Procedures

The SA must assess whether the SFA is complying with civil rights requirements as applicable to the Child Nutrition Programs, i.e., NSLP (including the Fresh Fruit and Vegetable Program, Seamless Summer Option, and The NSLP Afterschool Snack Program), the SBP, and the SMP.

SAs are encouraged to complete the civil rights compliance evaluation off-site unless on-site validation is required as described below.

Pre-visit Review Procedures

Off-site Assessment Tool

Questions 800-807 of the *Off-site Assessment Tool* focus on civil rights compliance. If this portion of the Tool is not completed prior to the on-site review, applicable documentation must be available for the SA to review at the start of the on-site portion of the review.

Supporting Documentation

- a copy of the SFA's public release
- a description of procedures for receiving and handling Civil Rights complaints

- information on the number and description of complaints alleging discrimination in the current and prior school year
- information about the SFA's most recent civil rights training for staff
- a description of the SFA's procedures for collecting racial/ethnic data

Off-site Review Procedures

To evaluate civil rights compliance, the SA will:

- Ensure that the SFA's procedures, as described in the *Off-site Assessment Tool*, meet civil rights requirements

If the *Off-site Assessment Tool* identifies any potential problems or requires additional documentation, the SA should make an attempt to obtain clarification and/or the necessary documents before categorizing a response as unsatisfactory. However, a response to a pre-visit question may still be unsatisfactory even after obtaining clarification or additional documentation.

Off-site Review Questions

800) What non-discrimination statement is used for Program materials?

State or local agencies, and their subrecipients, must post the following Nondiscrimination Statement. The nondiscrimination statement must accompany any new printed materials and any web-based materials referencing FNS programs:

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

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact

the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

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

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

3) email: program.intake@usda.gov

This institution is an equal opportunity provider."

If the material is too small to contain the full statement, the material at minimum must include the following statement: "This institution is an equal opportunity provider."

The full statement must be included on outreach material when notifying potentially-eligible participants how to apply for benefits or when informing participants about their right to file a complaint.

These statements must be included on any document that references FNS programs.

Documents that do not reference FNS programs are exempt.

801) Obtain a copy of the SFA's public release.

The SA must obtain a copy of the SFA's public release. The release must contain the same information supplied in the letter to households except that the public release

must contain both the free and reduced price Income Eligibility Guidelines. The public release must also explain that:

- When known to the LEA, households will be notified of their children's eligibility for free meals if they are members of households receiving assistance from:
    - The Supplemental Nutrition Assistance Program (SNAP);;
    - Theta Food Distribution Program on Indian Reservations (FDPIR);
    - Temporary Assistance for Needy Families (TANF), if the State program meets Federal standards; or
    - When known to the LEA, households will be notified of any child's eligibility for free meals based on the individual child designation as Other Source Categorically Eligible,
- No further application is required for free meal benefits, if the household was notified by the LEA that all children in the household were directly certified;
- A child or other household member's receipt of benefits from an Assistance Program (SNAP, FDIPR, or TANF) extends eligibility for free benefits to all children who are members of the household. If any child in a household receiving Assistance Program benefits was not listed on the eligibility notice, the household should contact the LEA or school to have benefits extended to that child.

The SA may prepare the public release on behalf of its SFAs. In this case, the release must specify the responsibilities the SA will assume and must reference the schools covered by the public release.

Note: RCCIs are not required to submit a public release unless their enrollment includes day students.

802) What services does the SFA provide to households comprised of persons with Limited English Proficiency (LEP)?

SFAs are required to take reasonable steps to ensure meaningful access to FNS program information and services to persons with LEP. See FNS Memorandum SP 37-2016, *Meaningful Access for Persons with Limited English Proficiency in the School Meal Programs: Guidance and Q&As*; the *Eligibility Manual for School Meals*; and Section VII of FNS Instruction 113-1, *Civil Rights Compliance and Enforcement – Nutrition Programs and Activities*.

803) What are the SFA's procedures for receiving and processing complaints alleging civil rights discrimination within FNS school meal programs? If procedures are written, please provide a copy.

The SFA's methods of receiving and processing complaints are largely at the SFA's discretion. However, the methods must meet the following requirements:

- The SFA's procedures must note whether an allegation is made verbally or in person;;
- The SFA staff member receiving the allegation must transcribe the complaint;
- The SFA's procedures for receiving a complaint cannot prevent a complaint from being accepted; and
- The SFA's procedures must identify the outside agency to which complaints are forwarded (i.e., SA, FNSRO, FNS Office of Civil Rights, or USDA Office of Civil Rights).

Additionally, the SFA's procedures must not indicate that they attempt to resolve the complaint themselves, nor can the SFA's complaint process be a prerequisite for accepting a complaint.

804) Has the SFA received any written or verbal complaints alleging discrimination in FNS Programs in the current or prior school year?

If complaints were received, the SA must ensure that they were forwarded to the SA, FNSRO, FNS Office of Civil Rights, or the USDA Office of Civil Rights.

805) What procedures are in place for accommodating students with disabilities?

SFAs must make substitutions to NSLP and SBP meals to accommodate students with disabilities that restrict their diet. SFAs will receive reimbursement for accommodations outside the Program meal pattern, provided the accommodation request is supported by a medical statement signed by a State licensed healthcare professional. The SFA's response should indicate an understanding of requirements under 7 CFR 210.10(m)(1), 7 CFR 210.10(m)(2), 7 CFR 220.8(m);); FNS Memorandum SP 59-2016, *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs*; and FNS Memorandum SP 32 CACFP 13 SFSP 15-2015, *Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs*.

806) When was the SFA's most recent civil rights training for staff who interact with program applicants or participants (i.e., cafeteria staff, determining officials) and their supervisors? Who attended these trainings? What topics were covered by the training? Provide supporting documentation for the responses.

The SFA must provide documentation indicating that the civil rights training occurred and that required participants attended. Documentation must indicate that the following subjects were covered: Collection and Use of Data, Effective Public Notification Systems, Complaint Procedures, Compliance Review Techniques, Resolution of Noncompliance, Requirements for Reasonable Accommodations of Persons with Disabilities, Requirements for Language Assistance, Conflict Resolution, and Customer Service. For example, the SFA may provide a copy of the agenda for the relevant training and a corresponding sign-in sheet.

807) How does the SFA collect racial/ethnic data? How often is this information collected? Provide documentation to support the response.

The SFA must collect racial/ethnic data on an annual basis through a mechanism of their choosing. If responses to the *Off-site Assessment Tool* indicate potential problems, the SFA will be considered noncompliant and the SA must require appropriate corrective action.

On-site Review Procedures

On-site Assessment Tool

SA findings are recorded on Questions 811-812 of the *On-site Assessment Tool*.

On-site Review

To evaluate civil rights compliance, the SA will:

- Determine whether the "And Justice for All" Poster is on display, as described below
- Determine whether the non-discrimination statement appears on pertinent materials
- Review denied applications to determine if a disproportionate number of these applications were submitted by minority households. Refer to Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance* for more information.
- Observe the meal service to ensure all children are receiving equal benefits without discrimination
- Validate corrective action on-site, if necessary, if non-compliance is detected by the *Off-site Assessment Tool*

"And Justice for All" Poster

FNS Instruction 113-1 requires that participating schools prominently display the USDA nondiscrimination poster "And Justice for All". All posters must be 11" x 17". The poster must be placed in a location that enables program participants to read the text of the poster without

obstruction. For example, the poster could be placed next to the cashier, at the beginning of the serving line, over the milk cooler, or at the entrance/exit to the cafeteria.

The SA must ensure that each site selected for review has displayed the poster in an appropriate location. The SA must require corrective action if the poster is not posted or cannot be found. The SA must provide technical assistance if the poster is posted but in an inappropriate location.

An SFA will be compliant with this review element if the "And Justice for All" poster is posted in an appropriate location at each school selected for review.

Use of Correct Non-discrimination Statement

The SA must determine whether program materials contain the correct non-discrimination statement (see Question 800). Through the course of the review, examine relevant documents (e.g., Meal Benefit applications, public release) to ensure that each contains the correct non-discrimination statement.

An SFA will be compliant with this review element if all program materials contain the correct non-discrimination statement.

Composition of Denied Applications

When reviewing denied applications (see Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance*), the SA must determine whether a disproportionate number of these applications were submitted by minority households. If this has occurred, the SA must determine whether these applications were denied for any reason other than the applications being incomplete or the household being ineligible based on income or other program requirements.

Civil Rights Meal Observation Responsibilities

The SA must determine whether the SFA provides children equal benefits without discrimination regardless of their race, color, national origin, sex, age, or disability on the day of review at each reviewed school during the lunch and breakfast meal services. Meal service observations must indicate no discrimination occurs regarding the protected classes of Child Nutrition Programs.

An SFA will be compliant with this review element if lunch and breakfast meal service observations on the day of review indicate that all children have equal access to the applicable programs.

Corrective Action Validation

Corrective action validation is only applicable if the Civil Rights portion of the *Off-site Assessment Tool* identifies noncompliance with civil rights requirements. Under these circumstances, the SA must address deficiencies by requiring corrective action and verifying on-site that the SFA has implemented, or is in the process of implementing, the corrective action as specified by the SA. The specific actions of the SA will vary on a case-by-case basis and depend upon the deficiency and the determined corrective action. If the SA determines that the approved corrective action has not been implemented or did not effectively resolve the problem, the SA must prescribe further corrective action as part of the on-site review process.

Note: Satisfactory responses to the *Off-site Assessment Tool* must not preclude the SA from correcting a civil rights deficiency found through the course of their other on-site Administrative Review responsibilities.

Technical Assistance/Corrective Action

An SFA will be compliant with this Module if it meets the requirements of each review element as described above. Deficiencies the SA identifies within any of the module's review elements

must result in a noncompliant civil rights evaluation. The SA must address deficiencies by requiring corrective action and must bring the SFA into compliance with this Module's requirements.

All deficiencies are recorded on the *On-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: General Area SFA On-site Monitoring

Intent/Scope of Monitoring

The SA must determine that each SFA with more than one school operating the NSLP performs at least one on-site review. This on-site review must evaluate the lunch counting and claiming system used by the school and must observe the general areas of review that are readily observable in each school under its jurisdiction.

The SA must also ensure that each SFA with more than one school operating the SBP performs at least one on-site review. The on-site review must evaluate the breakfast counting and claiming system used by the school and must observe the readily-observable general areas of review. A minimum of 50 percent of the schools operating the SBP under the SFA's jurisdiction must be monitored at least once every two years.

The on-site reviews must occur by February 1 of each year.

SFA On-site Monitoring is a component of the General Areas of review.

Note: Refer to FNS Memorandum SP 14-2011, *Prototype Checklist for SFAs for Conducting Annual On-site Reviews.*

Review Procedures

To assess compliance, on-site monitoring requirements are evaluated at the schools selected for review.

Pre-Visit Review Procedures

Off-site Assessment Tool

The section of the *Off-site Assessment Tool* pertaining to this module contains Question 900. Question 900 of the *Off-site Assessment Tool* assesses the procedures the SFA uses to ensure that all schools are meeting program requirements. For further information, see On-site Review Procedures below.

On-site Review Procedures

The SA must conduct an on-site review to determine whether the SFA completed on-site monitoring according to requirements at the reviewed schools. The SA should interview SFA staff to determine whether the SFA monitoring requirements are fully understood and whether the SFA is in compliance with those requirements. The SA should review any documentation available on-site.

If an Administrative Review of the SFA is conducted prior to February 1, and the SFA has not completed on-site monitoring reviews, review the timeline to determine whether or not the requirement will be met. If it is determined that it will not, the SA should review monitoring activity from the prior SY to determine whether the SFA effectively schedules on-site monitoring to meet the February 1st completion date, or whether the problem is a trend.

If the Administrative Review is conducted after the February 1 deadline, examine only the documentation for the current program year's activities. If the SFA did not complete the reviews by February 1 or the extended deadline, examine the prior year's documentation to determine whether this is a trend or one-time occurrence.

On-site Assessment Tool

Questions 901-903 of the *On-site Assessment Tool* focus on SFA compliance with on-site monitoring requirements. These questions address whether the on-site monitoring visit occurred by February 1, whether corrective action was necessary and whether corrective action was successful in resolving the problem(s).

Technical Assistance/Corrective Action

All deficiencies must be recorded on the *Off-site* and *On-site Assessment Tool,* as applicable, in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: General Area – Local School Wellness Policy and School Meal Environment

Intent/Scope of Monitoring

Schools play a critical role in promoting children's health, preventing childhood obesity, and preventing diet-related chronic diseases. To help foster a healthy school environment, Section 204 of the Healthy, Hunger Free-Kids Act added a Section 9A to the Richard B. Russell National School Lunch Act (NSLA) to expand the scope of wellness policies.

Note: The scope of monitoring may require the SA to assess how unit(s) of the LEA, other than the school food service, implement(s) their respective local school wellness policy responsibilities..

This monitoring area falls under the General Areas of the Administrative Review.

Currently there are no additional review procedures for the School Meal Environment.

Review Procedures

SAs are expected to assess local school wellness policy compliance off-site through the *Off-site Assessment Tool*.

Off-site Assessment Tool

Questions 1000-1006 in the *local school wellness policy* portion of the *Off-site Assessment Tool* assess compliance with local school wellness policy requirements.

Supporting Documentation

- a copy of the current local school wellness policy
- documentation demonstrating the local school wellness policy has been made available to the public
- documentation of efforts to review and update the local school wellness policy, including an indication of who is involved in the update and of methods the SFA uses to make stakeholders aware of their ability to participate
- a copy of the most recent triennial assessment on the implementation of the local school wellness policy; and
- how the policy compares to model policies..

Off-site Assessment Procedures

SAs are not responsible for evaluating the quality of the local school wellness policy goals or policies. The SA's responsibilities are to assess whether the:

- local school wellness policy contains the required elements
- required steps have been taken regarding local school wellness policy implementation, transparency, public input, and public availability

Below is a list of the local school wellness policy *Off-site Assessment Tool* questions.

Off-site Assessment Tool Questions

1000) Please provide a copy of the current local school wellness policy or appropriate web address.

The SA must obtain a copy of the current local school wellness policy. The SA must examine the document and determine whether the policy includes:

- Goals for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness. Examples of other school-based activities, may include (but are not limited to) improving the dining environment, giving students more time to consume their meals, and/or ensuring food is not used as a reward.
- Nutrition guidelines for all foods available on the school campus
- A plan for measuring local school wellness policy implementation
- Designation of one or more officials in charge of the local school wellness policy

1001) How does the public know about the local school wellness policy?

The local school wellness policy must be made available to the public. The SA must determine how the local school wellness policy is made available to the public. For example, the local school wellness policy could be posted on the school's public website or distributed with other important information at the beginning of the school year. Regardless of the means, the SA must obtain documentation to support compliance (e.g., the website link, copy of distribution packet).

1002) When and how does the review and update of the local school wellness policy occur?

The local school wellness policy must be reviewed and updated on a periodic basis. The frequency of updates to the local school wellness policy local school wellness policy is not specified by FNS, as the need to update will vary based on the content and structure of the plan. The SA must obtain documentation demonstrating how this requirement is met. For example, if the local school wellness policy is updated at an annual stakeholder meeting, documentation indicating that the meeting occurred (e.g., an agenda, attendance sheet) would be appropriate.

1003) *Who is involved in reviewing and updating the local school wellness policy? What is their relationship with the SFA?*

Parents and guardians, students, physical education teachers, school health professionals, school administrators, the school board, representatives of the SFA, and the general public must be permitted to contribute to the development, implementation, periodic review, and update of the local school wellness policy. The SA must determine who is involved with reviewing and updating the local school wellness policy and whether their participation meets requirements.

1004) *How are potential stakeholders made aware of their ability to participate in the development, review, update, and implementation of the local school wellness policy? Provide documentation to support the response (or appropriate Web site URL).*

The SA must determine how participation from the permitted stakeholders is solicited. Documentation demonstrating outreach should be assessed. For example, the district might send out a district-wide email or post flyers in various locations to notify potential stakeholders about the opportunity.

1005) *Please provide a copy of the most recent assessment on the implementation of the local school wellness policy.*

The SA must obtain a copy of the most recent assessment. The SA must examine the document and determine whether the assessment includes information regarding:

- The extent to which schools are in compliance with the local school wellness policy
- The progress made toward attaining the goals of the local school wellness policy
- The extent to which the local school wellness policy compares to a model Local School Wellness Policy. Model policies can be found at http://teamnutrition.usda.gov/healthy/wellnesspolicy.html

1006) *How does the public know about the results of the most recent assessment on the implementation of the local school wellness policy? Please provide a copy of the documentation necessary to support your response or appropriate Web site URL.*

The assessment must be made available to the public. How the assessment is made available is at local discretion. The SA must determine the manner in which the public is made aware of the most recent assessment on the implementation of the local school wellness policy.

Technical Assistance/Corrective Action

The SA must deem an SFA compliant with the local school wellness policy Module if the requirements of the review are met, as described above. Deficiencies identified within the Module's review element must result in a noncompliant local school wellness policy evaluation.

Deficiencies must be addressed through documented corrective action. Corrective action is considered appropriate and sufficient when the action permanently corrects the deficiencies and brings the local school wellness policy into compliance with the Module's requirements.

Note: FNS will assist LEAs in the transition to these new requirements by focusing on technical assistance during Administrative Reviews to facilitate implementation of the local school wellness policy requirements.

The only exceptions are the absence of a local school wellness policy or the absence of required content (previously required in 2004), which must be addressed through corrective action.

The SA must record all deficiencies on the *On-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided at the exit conference.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: Smart Snacks in School (All Foods and Beverages Sold in School)

Intent/Scope of Monitoring

Schools must meet the minimum requirements in 7 CFR 210.11 for all foods and beverages sold in school (also known as *Smart Snacks in School*) to increase consumption of healthful foods during the school day and support a healthy school environment. The SA's responsibility is to understand the entities responsible for selling foods/beverages to students, and to ensure that food and beverages sold meet the minimum requirements established in 7 CFR 210.11.

This Module is a General Area of Review.

Schools that receive a HealthierUS Schools Challenge (HUSSC) Award (any level) by meeting the HUSSC criteria effective August 31, 2014 have been certified compliant with these requirements and are, therefore, exempt from this part of the review. A print out from the Team Nutrition Web site listing the school as an awardee, a copy of the award announcement email, or a copy of the award certificate should be kept on file to verify HUSSC award status during the review.

There is no fiscal action if a SFA/LEA is found out of compliance with Smart Snacks requirements.

Review Procedures

The SA must assess compliance with Smart Snacks requirements at all the schools selected for review. The requirements apply to all entities selling foods and beverages to students on the

school campus during the school day, including entities operating independently from the school food service.

Note: While free potable water must be made available to students during the meal service and other sources may sell water to students, program operators are not to promote or offer water or any other beverage as an alternative selection to fluid milk in the reimbursable meal throughout the food service area.

The timeframe for this assessment is the school year in which the Administrative Review takes place, the review period, and the day of review.

To evaluate compliance, the SA must ensure that:

- All foods and beverages sold on the school campus (excluding reimbursable meals), during the school day (defined as 12 am on a day of instruction to 30 minutes after the end of the official school day), meet regulatory requirements. This includes a la carte items sold during meals, and foods/beverages sold in vending machines, school stores, and any other venue; and
- State-set fundraising limits for exempt fundraisers are observed.

Off-site Review

SAs have discretion to complete this portion of the review off-site, prior to the on-site review, or during the on-site review.

To evaluate compliance, reviewers must:

- Examine one week of menu documentation from the review period to ensure that foods and beverages sold a la carte during meal services are compliant with requirements. Examples of acceptable documentation may include, but are not limited to: menus, production records, USDA Foods Information Sheets and related materials (e.g., CN

labels, food item specifications, standardized recipes) for the school week under review. For efficiency, reviewers are encouraged to review the same week selected for the Meal Components/Quantities review.

- Interview school district staff (e.g., superintendent, principals, or other administrative designees) and school food service staff to understand the scope of food and beverage sales at the reviewed school(s), including the number of exempt fundraisers and sales of foods and beverages in the cafeteria, school stores, snack bars, coffee bars, vending machines, and any other food or beverage points of sale available to students.
- Review nutrition documentation for a minimum of 10% of foods and beverages items sold in schools (reimbursable meals excluded) to ensure that Smart Snacks requirements are met. Reviewers must obtain the nutrition documentation from the entities responsible for each point of sale, which may include entities outside the school food service. The 10% sample selected for documentation review must represent all locations where foods and beverages are sold to students. Any documentation that contains the necessary information is acceptable. Examples include, but are not limited to: Alliance for a Healthier Generation Smart Snacks Calculator print outs, recipes, product specifications, purchase orders, receipts, or other documentation.

On-site Review

During the on-site review, the SA must observe all locations where students are able to purchase foods and beverages to ensure that:

- The nutrition documentation provided for review is consistent with the foods and beverages offered to students for sale, including foods sold a la carte during meal services;
- School food service staff and school administrators are familiar with requirements; and
- NSLP/SBP entrees (exempt from standards) are only sold to students the same day, or the day after, the entrees are initially offered in the NSLP/SBP.

Reviewers are encouraged to observe the points-of-sale-at the time operation, i.e., when foods/beverages are sold to students.

Recording Findings

The SA must record review findings on the *Off-site Assessment Tool* Questions 1100-1103 and *On-site Assessment Tool* Questions 1104- 1107.

Technical Assistance/Corrective Action

A SFA/LEA is compliant with this Module if the SA determines that each school selected for review only sells foods and beverages to students that are compliant with standards.

When non-compliance is identified, the SA, in conjunction with the SFA/LEA must develop a corrective action plan with specific steps, which may include required training and/or technical assistance. The plan must include reasonable timeframes for the SFA/LEA to achieve and maintain compliance with Smart Snacks requirements. The timeframes and other details of the corrective action plan will vary, depending on the nature of the findings.

The SA must record all findings on the *On-site Assessment Tool* in the applicable comments sections.

As a reminder, there is no fiscal action if a SFA/LEA is found out of compliance with Smart Snacks requirements.

Module: General Area – Professional Standards

Intent/Scope of Monitoring

The Professional Standards regulations in 7 CFR 210.30 establish hiring standards for new school nutrition program directors at the SFA level. In addition, the regulations establish annual training standards for all school nutrition program directors, managers, and staff. The required annual training hours vary according to the employee's role in the management and operation of the school nutrition program.

Hiring Standards

The SA is expected to examine SFA records documenting that applicable hiring actions for new program directors completed on or after July 1, 2015, are consistent with hiring standards. This includes internal hiring promotions. Prior food safety training is also required for new program directors that are hired (training must have occurred either within 5 years prior to the starting date, or must occur within 30 calendar days of the start date). Documents that are reviewed may include, but are not limited to, job postings, college transcripts, education information, and resumes for new hires.

Training Requirements

The SA is also expected to examine SFA records that document the completion of annual training standards by all personnel (program directors, managers, and staff). Training certificates, training sign-in sheets, and training agendas are all examples of documents that a SFA may submit to demonstrate compliance with the training standards. Reports from the USDA Training Tracking Tool (or similar alternative training tracking tool) that demonstrate compliance with the training standards are also examples of possible documentation.

The timeframe for this assessment is the school year in which the Administrative Review takes place; however, the SA has discretion to review documentation from a prior school year, if the State agency has allowed for SFA personnel to complete the required annual training hours over a two- year period.

This monitoring area falls under the General Areas of the Administrative Review.

Review Procedures

The SA must assess compliance with following Professional Standards requirements for the SFA:

- Hiring standards apply to school nutrition program directors hired on or after July 1, 2015.
- Annual training requirements apply to all school nutrition program personnel beginning July 1, 2015.

The SFA must be prepared to provide information requested that includes at minimum, a current list of school nutrition staff personnel and individual documentation for each of those individuals showing the following:

- Name of staff person
- Date hired
- Title/Position
- A brief list of core duties/responsibilities
- Employment Status (Full Time, Part Time, Acting, Substitute), including the average hours/week for each Part Time employee
- Professional Standards Employee Category/Position (Nutrition Program Director, Manager or Staff)

Hiring Standards (Program Directors hired on or after July 1, 2015 ONLY)

- Highest level of education achieved
- Years of school nutrition program experience
- Prior food safety training (8 hours of food safety training must be completed within 5 years prior to the starting date, or within 30 calendar days of the starting date)

NOTE: When applicable, documentation showing that the State agency granted exceptions for LEAs with a student enrollment of less than 500 should be reviewed. For LEA enrollments less than 500, the SA may approve the hire of a candidate with high school diploma (or GED) and less than required years of experience, if the best qualified candidate.

Annual Training Standards

Training must be job-specific and intended to help employees perform their duties well. Training needs are best assessed by an employee in consultation with their manager, director, or State agency. Training may be obtained in many ways, such as in-person, online, through local meetings, webinars, conferences, etc. A variety of free and low-cost training resources and formats are available. Compliant training sessions may consist of annual training that is offered or required every year by the State agency. USDA does not approve nor require specific training programs.

- Annual Training Records
    - USDA Training Tracking Tooling has been provided as a resource to assist SFAs to track and record the annual training hours completed by each school nutrition program employee.
    - Alternative training tracking tools may be developed by SAs and/or SFAs but must include at minimum the required fields listed in the USDA Professional Standards Training Tracking Tool. These fields would include Key Areas, Training Topics and Learning Objectives as listed in the Professional Standards Learning Objectives and Topics with Codes which can be found on the USDA Professional Standards Website. (See tool for required fields.)
    - Supporting documentation for all completed trainings, i.e., *agendas, sign-in sheets, certificates of completion, etc.* must be maintained on file.

While FNS is not prescribing an exact format for alternative tracking tools, SFAs should clearly document all required information and keep it consolidated in one place. This should include any hands-on, informal training that takes place such as 15 minute training on how to use new food service equipment.

Please see below for a suggested format:

Employee First Name	Employee Last Name	Hiring Date	Employee Position: i.e. Director/ Manager/ Staff	Required Hours of Training	Training Title/ Subject	Training Date(s)	Length of Training (creditable time)	School Year Training Applied To	Completed Training Hours Year to Date

Pre-Visit Review Procedures

Off-site Assessment Tool

The SA will need to address Questions 1200-120909 in the *Off-site Assessment Tool*. The SA has the discretion to complete the *Off-site Assessment Tool* questions either off-site (prior to the on-site review) or during the on-site review. The *Off*-Site *Assessment Tool* contains a series of questions related to professional standards, many of which can be answered using the tools or methods described above. These questions explore whether or not the SFA has met the required hiring and training standards.

Analysis of Off-site Assessment Tool

The SA must examine the *Off-site Assessment Tool* to ensure the SFA is meeting professional standards requirements outlined in (7 CFR 210.30). The *Off-site Assessment Tool* informs the reviewer of the SFA's training and hiring practices and will be verified during the on-site review through documentation.

NOTE: In any school year, employees hired on or after January 1 must complete only half of the required annual training hours.

On-Site Review Procedures

The on-site portion of the Administrative Review consists of the SA interviewing appropriate SFA personnel and determining whether the SFA is in compliance with all Professional Standards requirements. It is essential that through on-site review of documentation and interviews with SFA personnel the SA is able to validate the information gathered on the *Off-*

site Assessment Tool and answer the question on the *On-site Assessment Tool* (Questions 1212-1219).

On-site documentation review could include, but is not limited to:

- Nutrition program employee lists
- Training sign-in sheets and attendance rosters
- Certificates of completion for applicable trainings
- Training agendas
- Planned or scheduled trainings
- Education achievement certificates (i.e. diplomas)

Technical Assistance/Corrective Action

All deficiencies must be recorded on the *Off-site and On-site Assessment Tools*, as applicable, in the appropriate/corresponding comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

- A SFA is compliant with the Professional Standards requirements if the SA determines that documentation demonstrates that all school nutrition program personnel have met or will meet annual training requirements and that all new directors (hired on or after July 1, 2015) have met the hiring requirement as listed in the regulations.

When non-compliance is identified, the SA, will provide technical assistance and must develop, in conjunction with the SFA, a Corrective Action Plan that outlines the required actions to bring the SFA into compliance, which may include required training and/or educational courses. The plan must also include reasonable timeframes for the SFA to achieve and maintain compliance with Professional Standards requirements. The timeframes and other details of the Corrective Action Plan will vary, depending on the nature of the findings.

For any findings associated with non-compliance of hiring standards, the SA should consult with their respective FNS Regional Office before finalizing a Corrective Action Plan. Although the Regional Office is not responsible for approving the CAPs, staff is available for consultation. FNS National Office approval is not required; however, the National Office is also available for consultation, if requested.

The SA must record all findings on the *On-site Assessment Tool* in the applicable comments sections.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to section VIII, *Fiscal Action*, Module: *Withholding Payments.*

Module: General Area – Water Availability

Intent/Scope of Monitoring

The goal of the water review is to ensure that children have access to water during the lunch and breakfast meal services. During the on-site visit, the SA must observe and assess whether the school makes free water available to students as required. This monitoring area falls under the General Areas of the Administrative Review.

Note: While water must be made available to students during meal service, program operators are not to promote or offer water or any other beverage as an alternative selection to fluid milk throughout the food service area.

Review Procedures

The SA's responsibility is to determine whether free potable water is available at each school selected for review during the lunch and breakfast meal services on the day of review. *The water requirement for breakfast only applies when breakfast is served in the cafeteria.* Refer to FNS Memorandum SP 28-2011, *Child Nutrition Reauthorization 2010: Water Availability During National School Lunch Program Meal Service* and *National School Lunch Program and School Breakfast Program: Nutrition Standards for All Foods Sold in School as Required by the Healthy, Hunger-Free Kids Act of 2010; Interim Final Rule* (78 CFR 39068, published June 28, 2013).

The SA must determine compliance on-site by observing the lunch and breakfast meal services. The SA should be able to easily incorporate these expectations alongside other lunch and breakfast meal service observation responsibilities.

On-site Review Procedures

On-site Assessment Tool

The SA must record findings on Question 1300 of the *On-site Assessment Tool*.

On-site Review

The SA's responsibility regarding water compliance is limited to the day of review at each school selected for review. The SA must assess compliance in any location where lunches are served (during the meal service) and when breakfast is served in the cafeteria.

During the lunch and breakfast meal service observations, the SA must ensure that free water is available for consumption by program participants.

Schools can provide free water in a variety of ways. For example, schools can offer water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups with drinking water. Any school that does not make free water available or restricts access during the lunch and breakfast meal periods is out of compliance. The SA must provide technical assistance and require the SFA to take corrective action.

Technical Assistance/Corrective Action

The SA must deem an SFA compliant with the water Module if the SFA meets the requirements of the review element as described above at each of the reviewed schools. If the SA identifies deficiencies at any of the reviewed schools, the SA must deem that SFA noncompliant with the water evaluation. The SFA must address deficiencies through corrective action. Corrective action is considered appropriate and sufficient when the action permanently corrects the deficiency and brings the SFA into compliance with the Module's requirements.

The SA must record all deficiencies on the *On-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: General Area – Food Safety, Storage, and Buy American

Intent/Scope of Monitoring

FNS recognizes SA staff are not licensed health inspectors, and therefore the intent of this review is not to conduct a review equal to a health inspection. However, it is the SA's responsibility to ensure that all selected schools meet the food safety and storage requirements and the regulations referenced in this Module. This includes any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. The SA must also ensure that all selected schools comply with the Buy American provision and policy referenced in this Module.

This monitoring area falls under the General Areas of the Administrative Review.

Review Procedures

To evaluate compliance, the SA must:

- Review the written food safety plan for compliance with Hazard Analysis Critical Control Point (HACCP) program criteria found in 7 CFR 210.13(c)
- Determine whether the SFA has any contracted or self-operated warehouses and, if so, determine whether all foods (commercial and USDA) are being stored properly (see Optional Off-site Storage Review, if applicable)
- Determine whether two food safety inspections have been obtained
- Confirm the posting of the most recent food safety inspection report
- Verify compliance with HACCP principles and local and State health standards
- Check temperature logs to ensure proper recordkeeping

- Examine on-site food storage in reviewed schools and off-site food storage facilities, as applicable, for dates, condition of foods, and origin of agricultural food components
- Review a variety of foods by component category to assess if the food is produced or processed domestically, and if domestically processed, done so substantially using domestic agricultural commodities
- Communicate the results of the compliance with the Buy American provision and review elements to the SA staff conducting procurement reviews of that SFA. The staff conducting procurement reviews will then, on their procurement review, need to closely review whether solicitation and contract documents include requirements for domestic foods. However, the review of compliance with Buy American on the AR can be completed as a separate review from the procurement review and is not contingent upon the procurement review. Please see findings and corrective action sections.

SAs are expected to assess food compliance off-site and on-site.

Note: Food Safety inspection report formats may vary, and in some cases be too large in size to post. SA reviewers should ensure that the posted portion reflects the inspection dates and approval/disapproval status and allow that other supporting documents contained in the report be maintained on siteavailable upon request.

Pre-visit Review Procedures

Food Safety Program

The SA should conduct an off-site review of the SFA's written food safety program based on either the traditional or process approach to HACCP principles (7 CFR 210.13(c)). Regardless of the HACCP approach used, the SA must review the written food safety plan to ensure that it contains the required elements of the selected approach.

The process approach requirements are explained in further detail in *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles*. SA staff should be knowledgeable about this guidance and utilize it to determine compliance of a process approach food safety program.

While FNS recommends that the SFA use the process approach to HACCP to construct a food safety program, the SA should be prepared to assess compliance with either the traditional or process approach. If the SFA bases the written food safety program on the traditional approach to HACCP, SA staff must compare the plan against the requirements listed under 7 CFR 210.13(c)(1). If the SFA bases the written food safety program on the process approach to HACCP, SA staff must compare the plan against the requirements listed under 7 CFR 210.13(c)(2).

Note: SFAs are required to update HACCP-based food safety programs to cover any facility where food is stored, prepared, or served for the purposes of the NSLP, SBP, or other FNS programs. This means the food safety program should contain standard operating procedures for safe food handling on school buses, in hallways, school courtyards, kiosks, classrooms, or other locations outside the cafeteria, as applicable.

On-site Review Procedures

On-site Assessment Tool

The SA must record findings in Questions 1400 – 14111 on the *On-site Assessment Tool.*

On-site Review

The SA must observe meal preparation and service on the day of review at the selected schools to determine whether the SFA follows the food safety program and HACCP principles.

To make this determination, the SA should use the statements below as a guide:

- Proper personal hygiene is evident (e.g., hairnets, gloved hands, appropriate hand washing)
- Cross-contamination is prevented
- Food temperatures are monitored and recorded
- Refrigerator and freezer temperatures are monitored and recorded
- Food preparation and service areas are clean
- Clean utensils and equipment are used for food preparation and meal service
- No obvious evidence of pests is present

Note: These statements are not exhaustive, and the SA should use discretion regarding other potentially harmful observations related to proper food handling. For example, if the SFA On-site Monitoring form for a selected school noted a particular food safety violation, then the SA should ensure that the same violation does not occur during the day of review. Furthermore, the SA should ensure that a copy of the food safety program is available and easily accessible to food service staff at each selected school.

The SA must deem an SFA compliant with this review element if the written food safety program meets these requirements and the SA observations correspond to the statements above and/or any additional discretionary criteria. If the SFA does not meet either of these criteria, the SA must deem the SFA noncompliant with this review element and the SA must require appropriate corrective action.

Food Safety Inspections

FNS requires each SFA to ensure each participating school receives at least two food safety inspections each school year from the State or local agency responsible for these inspections. Typically, such inspections are conducted by the local health department (7 CFR 210.13 (b)).

The SA should notate the date of the inspections based on the relevant food safety inspection reports. (See Review Procedures, above.) Additionally, FNS requires each school to post the

most recent food safety inspection report in a publicly visible location for all participants of the school meals program to view. SAs should use a common sense approach when assessing whether the most recent food safety inspection report is visible to the public. For example, posting the report by the entrance to the cafeteria is sufficient, while posting the report by the employee-only entrance to the cafeteria is not.

If, at the time of the on-site visit, the school has received zero or one food safety inspections, the SA must notate the date for the two most recent food safety inspections. Additionally, the SA must ensure that the school received two food safety inspections in the previous school year. If the school did not receive two inspections in the previous year, the SA must ensure that the SFA or school requested two food safety inspections from the responsible agency. Sufficient written documentation could be an email, letter, or fax to the appropriate authority requesting an inspection.

The SA must deem a school compliant with this review element if the school meets the following criteria:

- The SFA has received two food safety inspections in the current year OR
- The SFA received two food safety inspections in the previous school year OR
- The SFA has made a documented request to the responsible agency for food safety inspections

AND

- The most recent food safety inspection report is posted in a location visible to the public

If the SFA does not meet any of these criteria, the SA must deem the SFA noncompliant with this review element and the SA must issue appropriate corrective action.

Recordkeeping

FNS requires each school in the SFA to maintain temperature logs for a period of six months (7 CFR 210.15(b)(5)).

During the on-site visit to each selected school, the SA must ensure that the SFA maintains these documents for the prescribed period. To determine compliance at each selected school, the SA must ask the school food service personnel to provide temperature logs for one day within the past six months.

The SA must deem a school compliant with this review element if the SFA provides the aforementioned document to the SA. If this criterion is not met, the SA must deem the school noncompliant with this review element and the SA must require appropriate corrective action.

Food Storage

Each SFA is required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

To determine compliance, the SA must observe the conditions in the on-site, and off-site if applicable, storage facilities of the reviewed schools/SFA. On-site storage facilities may include freezers, refrigerators, dry good storage rooms, and other areas. Off-site storage facilities would include SFA contracted or self-operated warehouses. When examining the applicable storage facilities, the SA must be mindful of the following rules regarding proper storage practices. These statements are not exhaustive and the SA should use discretion regarding other potentially harmful observations related to proper food storage:

- Temperature is appropriate for the applicable equipment (e.g., freezer, refrigerator, milk cooler)
- Food is stored 6 inches from the ceiling and 6 inches off the floor
- The food storage facility is clean and neat
- Canned goods are free from bulges, leaks, and dents
- Chemicals are clearly labeled and stored away from food and food-related supplies
- Open bags of food are stored in containers with tight fitting lids
- The FIFO (First In, First Out) method of inventory management is used

- No obvious evidence of pests is present

The SA must deem a school compliant with this review element if the SA's observations correspond with the statements above. If the SA's observations contradict the above statements or their own discretionary criteria, the SA must deem the school noncompliant with this review element and the SA must issue appropriate corrective action.

Buy American

See SP 38-2017, *Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program*.

Each SFA is required to purchase food that is produced or processed domestically, and if domestically processed, done so substantially using domestic agricultural commodities (7 CFR 210.21(d)). Substantially means over 51 percent, by weight or volume, of the final processed product consists of domestic agricultural commodities. For products procured by SFAs for use in the Child Nutrition Programs, the food component of the product would be the agricultural commodity. Therefore, any product processed by a responsive vendor must have over 51 percent of the agricultural food component of the product, by weight or volume, be domestic. Water is not a food component or agricultural commodity under the Child Nutrition Programs.

Often labels fail to reflect information to determine compliance. To ensure contractor compliance, SFAs, in their solicitations and contracts are encouraged to obtain a certification statement for vendors/manufacturers which may include: "We certify that (***insert product name***) is processed in the United States and contains at least **(X%)** of its agricultural food component, by weight or volume, from the United States." SFAs must include space for the supplier to fill in the name of the product and its percentage of the domestic agricultural food component contained therein.

Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under the Buy American provision as these products are from the territories of the United States. Although Hawaii is exempt from the Buy American provision, recipient agencies in Hawaii are required to purchase food products grown in Hawaii in sufficient quantities to meet school meal program needs (7 CFR 210.21 (d)(3)). The same applies to Puerto Rico under 42 USC 1760(n)(4).

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the domestic standard (i.e., are non-domestic) in circumstances when use of domestic products is truly not practicable. An alternative or exception may be utilized as long as documentation justifying an exception is maintained. Exceptions must be documented and must be done so before utilizing an exception. Examples of ways to document communications between SFAs and their food supplier regarding exceptions include emails, documentation of telephone communications, etc. However, alternatives to purchasing non-domestic food commodities or products should be considered first. Documentation must be maintained for three years as required in 7 CFR 210.23(d).

In addition to considering alternatives, reasons for any exceptions must be provided as to why the domestic product is being substituted with a non-domestic commodity or product. One resource SFAs and State agencies may use when considering alternatives is the market news reports available from the Agricultural Marketing Service (AMS). AMS provides free, unbiased price and sales information on agricultural commodities.

To determine compliance with the Buy American provision, the SA must select a variety of agricultural food components in various on and off-site storage facilities at the reviewed SFA/schools, as applicable, to assess if the foods received by the SFA are over 51% domestic. On-site storage facilities may include school freezers, refrigerators, dry good storage rooms, and other areas. Off-site storage facilities would include SFA-contracted or self-operated warehouses. When examining the applicable storage facilities, the SA will review a number of

agriculture food components per the categories identified below. To determine the number of foods for review, the SA will determine if the SFA stores food on-site in individual schools only, uses off-site storage facilities only, or stores food using a combination of on-site and off-site storage options.

The number of agricultural food components to review will be determined based on the SFA storage facility practices used:

- If the majority of agricultural food components used are located at individual schools only, the SA will review at each reviewed school 2-3 items in each agricultural food component category below;
- If the majority of agricultural food components used are located at an SFA's off-site storage facility only, the SA will review at the SFA's off-site storage facility 2-3 items in each agricultural food component category below; or
- If agricultural food components used are located at a combination of places both on-site at schools and at the SFA's off-site storage facilities, the SA will review 1-2 items in each agricultural food components category below for each school reviewed and 1-2 items in each agricultural food component category below at the SFA's off-site storage facilities.

Food Component Categories:

- Bakery, pasta, and other miscellaneous components, such as:
  - grain components delivered ready to serve; and
  - wheat flour, cornmeal, or other grain flours, used to prepare grain components such as pasta, bread etc.;
- Canned fruit and fruit juice;
- Canned vegetables and vegetable juice;
- Frozen fruit and fruit juice;
- Frozen vegetables and vegetables juice;
- Frozen meat/entrée items;
- Refrigerated foods, including but not limited to:

- produce;
- Dairy such as cheese, yogurt, and milk; and
- food components that may be thawing for future meal service;

The SA should deem a school compliant with this review element if the SA's review of agriculture food components does not identify any non-domestic produced food or processed food products received by the SFA, or if non-domestic agricultural foods are identified, documentation exists to support exceptions to the Buy American requirements. SFAs should consider and document alternatives that were considered. If the SFA has non-domestic agricultural food components and lacks documentation to support any exceptions, the SA must deem the school noncompliant with this review element. Non-domestic food components must be documented in the comments section of the *On- Site Assessment Tool* and communicated to the SA staff conducting the procurement review. The SA must provide technical assistance, establish a finding, and issue appropriate required corrective action. Where appropriate, corrective action may include reviewing food deliveries for contractor compliance; monitoring to ensure the correct domestic food components contracted for are delivered; and prior to accepting foods, ensuring that an alternative domestic food component, or an exception to purchase non-domestic foods, has been approved for delivery. Further corrective action includes developing policies and procedures for monitoring and ensuring compliance.

Note: For example, the reviewer should determine if the agricultural food components selected for review include information about whether the food is domestic. If the food package does not identify its origin at all or in the case of processed foods that its agricultural food components is over 51% domestic by weight or volume, the SFA may be out of compliance if an exception for non-domestic agricultural commodity or product was not first approved and documented by the SFA. Corrective action would include requiring monitoring by the SFA to ensure the correct domestic food components contracted for are delivered and prior to

accepting foods, ensuring that an alternative domestic food component, or an exception to purchase non-domestic foods, has been approved for delivery.

Note: SAs should communicate any findings to the SA staff conducting the procurement review. The staff doing procurement reviews will then need to closely review whether solicitation and contract documents include specifications for domestic foods, certifications of domestic content, and whether the SFA monitors contracts to ensure contractor compliance. Please note further that a finding in this area of the AR will not mean an automatic finding on the procurement review as the reviews are separate; however, there will be a finding in the procurement review if food solicitation and contract documents did not specify domestic foods, or certification of domesticity, etc., especially if such was a corrective action required by the AR.

Note: Documented USDA Foods are presumed to be domestic; however, processed end products that contain USDA Foods must meet the over 51% domestic, by weight or volume, requirement.

Off-site Storage Review, as applicable:

If applicable, the SA will visit SFA off-site food storage facilities as part of the Administrative Review when the SA determines the SFA uses an off-site storage facility. The SA must determine compliance using the same criteria and procedures in each review element as described above. Please note, however, that for State Administering Agencies' oversight must encompass compliance with requirements related to donated foods in 7 CFR Part 210 and Part 250.

Technical Assistance/Corrective Action

The SA must deem an SFA compliant with the Food Safety, Storage, and Buy American Module if the SFA meets the requirements of each review element as described above. The SA must

deem the SFA noncompliant if the SA identifies deficiencies within any of the Module's review elements. The SFA must address deficiencies through corrective action that brings the SFA into compliance with the Module's requirements.

All deficiencies are recorded on the *On-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

For the Buy American portion of this module, corrective action may include:

- Requiring the review of food deliveries for contractor compliance;
- Monitoring to ensure the correct domestic food components contracted for are delivered;
- Prior to accepting foods, ensuring that an alternative domestic food component, or an exception to purchase non-domestic foods, has been approved for delivery; and/or
- Developing policies and procedures for monitoring and ensuring compliance with the Buy American provision.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: General Area Reporting and Recordkeeping

Intent/Scope of Monitoring

The SA must determine whether reports are submitted as required by the State agency, and maintained with other Program records for a period of three years after submission of the final Claim for Reimbursement for the fiscal year. If audit findings have not been resolved, the three-year period is extended as long as required for resolution of audit issues. Additionally, the record retention period required by a State may exceed the three-year period. (7 CFR 210.23(c))

These reports and records include, but are not limited to:

- agreements and free and reduced price policy statements;
- approved and denied free and reduced price meal applications;
- procedures and documentation for direct certification for free meals, if applicable;
- procedures for alternate point-of-service meal counts, if applicable;
- verification records, including:
    - description of verification efforts,
    - documentation of verification,
    - results of verification, and
    - verification reports;
- Claims for Reimbursement (including supporting documentation, such as point-of-service benefit issuance rosters);
- meal count participation data by school;
- documentation of edit checks, on-site reviews, internal controls,, October enrollment, free and reduced price eligible data;
- menu and food production records and, if applicable, nutrient analysis records;
- all documentation provided in support of the Resource Management Section (including appropriate records to document compliance with the paid lunch equity

and revenue from nonprogram foods requirements);

- documentation associated with the local school wellness policy;
- number of food safety inspections obtained per school year by each school;
- records from the food safety program for a period of 6 months following a month's temperature records;
- records from the most recent food safety inspection;
- documents demonstrating compliance with Civil Rights requirements;
- audit reports and written responses; and
- any related corrective action.

For SFAs with a Special Provision Option school, refer to Section IX: *Special Provision Options* for more information on recordkeeping requirements.

Electronic recordkeeping is an allowed form of record storage.

Review Procedures

On-site Review Procedures

On-site Assessment Tool

Questions 1500-15022 on the *On-site Assessment Tool* assess compliance with reporting and recordkeeping requirements.

As the SA is reviewing other areas, it should assess compliance with the applicable reporting and recordkeeping requirements in order to answer Questions 1500-1502 of the *On-site Assessment Tool.*

Technical Assistance/Corrective Action

The SA must deem an SFA noncompliant with this review element if it does not meet the above requirements. The SA must provide technical assistance and require corrective action to bring the SFA into compliance with the requirements. The SA must document any technical assistance provided to the SFA and ensure required corrective action is timely and adequate.

The SA must record all deficiencies in the comment sections of the *On-site Assessment Tool*.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Module: General Area – School Breakfast and Summer Food Service Programs Outreach

Intent/Scope of Monitoring

SFAs must inform families of the availability of breakfasts offered under the SBP and meals offered through the Summer Food Service Program (SFSP).

A the beginning of each school year, when free and reduced price meal applications are sent to households, the SFA must notify families of the availability of the SBP. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

FNS also requires schools to conduct SFSP outreach before the end of the academic school year to ensure that eligible families are informed of the availability and location of SFSP meals.

The goal for monitoring this area is to determine whether the SFA conducts the required outreach activities to increase participation in the SBP and SFSP.

The SA conducts a review of the SBP and SFSP outreach as part of the General Areas within the Administrative Review.

Review Procedures

SAs are expected to assess SBP and SFSP outreach activities off-site through the *Off-site Assessment Tool*.

Off-site Assessment Tool

The SA must record findings on Questions 1600-1601 of the *Off-site Assessment Tool.*

Off-site Review

The SA must review materials from and documentation of the SFA's SBP and SFSP outreach activities for the current school year to determine whether the SFA' s efforts are consistent with outreach requirements. The SA may monitor this area off-site with no additional on-site field work, unless identified issues warrant further attention on-site.

SBP

The SA must determine whether the information provided through the Tool and supporting documentation establishes that the SFA conducted the required SBP outreach.

Schools participating in the SBP must notify families of the availability of school breakfasts at the beginning of the school year, when free and reduced price meal applications are sent to households. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year (e.g. at the beginning of each semester or quarter).

SFSP

The SA must determine whether the information provided through the Tool and supporting documentation establishes that the SFA conducted the required SFSP outreach.

FNS requires schools to conduct SFSP outreach before the end of the academic school year to ensure that eligible families are informed of the availability and location of SFSP meals.

If the SFSP is administered by a different SA, the two SAs must work cooperatively to inform eligible families of the availability and location of SFSP meals.

Technical Assistance/Corrective Action

The SA must deem an SFA noncompliant with this review element if it does not meet the above requirements. The SA must provide technical assistance and require corrective action to bring

the SFA into compliance with the outreach requirements. The SA must document any technical assistance provided to the SFA and ensure required corrective action is timely and adequate.

The SA must record all deficiencies on the *Off-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference.

Fiscal Action

This is a General Area, thus fiscal action is not required; however, FNS encourages the SA to consider withholding program payments, in whole or in part, to any SFA for repeated or egregious violations that are not corrected. For additional information, refer to Section VIII, *Fiscal Action,* Module: *Withholding Payments*.

Section VI: Other Federal Program Reviews

Modules contained within this Section include:

- The NSLP Afterschool Snack Service
- Seamless Summer Option
- Fresh Fruit and Vegetable Program
- Special Milk Program

Module: The NSLP Afterschool Snack Service

Intent/Scope of Monitoring

The SA's review of the NSLP Afterschool Snack Service is intended to ensure participating sites serve students nutritionally-balanced snacks, provide appropriate educational or enrichment activities, and count and claim snacks accurately. The SA must examine documentation for each site selected for the Administrative Review that operates the NSLP Afterschool Snack Service. On-site observation of the afterschool snack service is at the SA's discretion.

The SA determines the NSLP Afterschool Snack Service compliance by collecting information about the operation of the snack service and comparing findings to Performance Standard 1, Performance Standard 2, and the General Areas, as applicable.

If a site selected for an Administrative Review does not operate the NSLP Afterschool Snack Service, the SA does not conduct this review.

Review Procedures

The SA review of the NSLP Afterschool Snack Service may be conducted off-site or on-site, at SA discretion, using the *Supplemental Afterschool Snacks Administrative Review Form.*

To evaluate compliance, the SA must:

- Verify site eligibility
- Ensure an accurate counting and claiming system is in place
- Ensure snacks meet snack service and nutritional requirements (7 CFR 210.10(o))
- Confirm the SFA conducts self-monitoring activities twice per year (7 CFR 210.9(c)(7))
- Make certain food safety and civil rights requirements are met (7 CFR 210.13(c) and 210.23(b), respectively)

Site Eligibility

The SA must ensure that:

- Sites serve snacks in an approved afterschool care program that offers educational or enrichment activities.
- At area eligible sites, the SFA maintains documentation that the school is located within the geographical boundaries of a school in which 50% or more of the enrolled students are certified as eligible for free or reduced price meals. See SP 08 CACFP 04 SFSP 03-2017, *Area Eligibility in Child Nutrition Programs* for more information.
- Schools serve snacks only after the end of the regular school day, unless the school operates an Expanded Learning Time Program. Refer to FNS Memorandum SP 04-2011, *Eligibility of Expanded Learning Time Programs for Afterschool Snack Service in the National School Lunch Program (NSLP) and Child and Adult Care Food Program (CACFP)* for additional information.

Afterschool Snacks may be offered at two types of sites through the NSLP:

- **Area Eligible Sites:** The site is at a school or located within the attendance area of a school in which at least 50% of enrolled students are certified for free or reduced price meals. Snacks are served at no charge to all children, and reimbursed at the free rate.
- **Non Area Eligible Sites:** Snacks are served at free, reduced price, and paid rates based on approved eligibility documentation.

Counting & Claiming

The SA must ensure that:

- The site maintains documentation to support the number of snacks it serves daily and maintains Claims for Reimbursement
- The sites has safeguards in place to ensure that it claims only one snack per child per day for reimbursement. Additional snacks may be provided, but may not be claimed for reimbursement.
- The site's snack orders, delivery records, and production records support the number of snacks it claims for reimbursement

- The site's counts adult snacks (including snacks served to students ineligible due to age limitations) separately from student snacks, as adult snacks are not eligible for reimbursement
- The site monitors age eligibility requirements for students receiving snacks to ensure compliance. Students. are eligible to participate through age 18 or until the end of the school year if their 19th birthday occurs during the school year. Students determined to have a mental or physical disability are not subject to age limitations
- The SFA provides to the SA an accurate count of snacks served each month at each site by the established due date for the monthly reimbursement claim
- For sites that are not area eligible, the SFA transfers the eligibility status of each student accurately to the roster. The SA could compare, for example, the point-of-service meal counts to the benefit issuance roster to ensure compliance
- The SFA keeps snack counts on file for three years

Snack Service and Nutrition Requirements

In accordance with 7 CFR 210.9(c), the SA must ensure that:

- Snack menus comply with meal pattern requirements
- SFAs plan/prepare snacks consistently with the one snack per child rule. Sites should consider participation trends in an effort to provide one reimbursable snack for each child each school day (7 CFR 210.10(a)(2))
- Production records reflect that menus meet serving size requirements. For more information on quantity requirements, see t the *Food Buying Guide for Child Nutrition Programs*
- Sites complete production records each day
- Sites price each snack as one unit
- Sites charge no more than $0.15 for a reduced price snack

SFA Afterschool Snack Service Review

The SA must ensure that:

- The SFA conducts a self-review of each NSLP Afterschool Snack operation twice per school year:
    - The SFA conducts the first self-review during the first four weeks of NSLP Afterschool Snack Service operations each school year; and
    - SFA conducts the second self-review of the NSLP Afterschool Snack Service prior to the end of each school year.

Note: This requirement is distinct from the SFA On-site Monitoring requirements described in Section V: *General Program Compliance*, Module: *SFA On-site Monitoring*.

Food Safety and Civil Rights

The SA must ensure that food safety and civil rights standards are met. Refer to Section V: *General Program Compliance*, Module: *Civil Rights* and Module: *Food Safety,* for additional details.

On-site Review Procedures (optional)

On-site observation of the afterschool snack service is at the SA's discretion.

On-site Afterschool Snack Service Observation

When observing the snack service, the SA must verify information obtained during the documentation review. In addition, the SA must observe that the afterschool snack service is following all Program requirements in the following areas:

- Site Eligibility
- Counting and Claiming
- Snack Service and Nutrition Requirements
- Food Safety and Civil Rights

Recording Errors

SAs must record errors identified during the review on *the Supplemental Afterschool Snacks Administrative Review Form* and the *On-site Assessment Tool* (Question 1700). These may include errors that occur outside of the claiming period or errors for other affected schools outside of the Administrative Review.

Technical Assistance/Corrective Action

The SA must provide technical assistance and require corrective action for all problems it identifies to bring the afterschool snack operation into compliance.

The SA must note technical assistance provided and any findings on the *Supplemental Afterschool Snacks Administrative Review Form* regardless of when the school corrects the problem.

Fiscal Action

SAs must take fiscal action for any Claim for Reimbursement that is not properly payable. FNS requires fiscal action if:

- The school claims snacks for adults or ineligible students (e.g., students who do not meet age limitations)
- The school claims snacks that are missing a component (e.g., only graham crackers are served)

Fiscal action is recorded on the *Other Meal Claim Errors,* Form S-2 and the *Fiscal Action Workbook.*

FNS does not require, but encourages SAs to take fiscal action for schools with repeated milk type violations (e.g., higher fat content milk, flavoring) as described under Review Procedures,

"*Snack Service and Nutrition Requirements*" in this Module. Refer to Section VIII: *Fiscal Action*, for details on what constitutes a repeat violation.

Module: Seamless Summer Option

Intent/Scope of Monitoring

The Seamless Summer Option (SSO) permits SFAs participating in the NSLP and/or SBP to serve meals during summer, during a scheduled break of 10 or more school days (or shorter periods for year-round schools, if approved by the State agency), and/or during unanticipated school closures using the same meal service rules and claiming procedures they use during the regular school year. See FNS Policy Memorandum SP 09-2017: *2017 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option,* for more information.

The SA determines SSO compliance in the same manner it assesses NSLP and SBP compliance, i.e., the SA collects information about program operations and compares its findings to Performance Standard 1, Performance Standard 2, and the General Areas. During the review, SA staff must ensure that the SFA and its participating sites are compliant with meal counting and claiming, menu planning, and food safety requirements established in 7 CFR 210 and 220.

Review Procedures

This module contains certain activities that must be completed on-site. Some activities may be completed off-site, at SA discretion.

Pre-Visit Review Procedures

Scheduling

If an SFA operates one or more SSO sites, the SA must select and review at least one SSO site as part of the Administrative Review. The site selected for SSO review may be any SSO site in the SFA, and does not have to be a site selected for the regular Administrative Review.

The review period for SSO is the last completed claim from the current or previous school year. The review may be conducted in the summer prior to or following the scheduled Administrative Review, although FNS encourages SAs to monitor the SSO site the summer after the Administrative Review. Monitoring the SSO site the summer after the Administrative Review allows the SA to benefit from the context of the SFA's Administrative Review, which may streamline SSO monitoring. Note that this may involve a second visit to the SFA to evaluate the SSO in operation. Below are scheduling examples:

Administrative Review Schedule	SSO site review
SY 2016/2017	Summer of 2016 or 2017
SY 2017/2018	Summer of 2017 or 2018

SAs are not required to conduct annual reviews of SFAs that operate under the SSO or to conduct any special reviews for these SFAs beyond the normal Administrative Review requirements of reviewing all SFAs during a 3-year cycle and reviewing at least one SSO site as a part of the review. However, State agencies are encouraged to review SSO sites even if an Administrative Review is not scheduled for that SFA, especially if there are significant operational problems.

Early planning and communication between the SA and SFA is crucial in scheduling a SSO visit. As soon as possible, the SA must contact the SFA to determine if any SSO sites are in operation, and if so, obtain the operating schedule. It is important to schedule the site review early because SFAs typically operate the SSO for limited periods.

If the school is operating the NSLP on a year-round basis and both NSLP schools and SSO schools will be operating at the time of the review, then an Administrative Review may be scheduled during the summer to avoid making the second visit to the SSO site.

Assessment Form

- Supplemental Seamless Summer Option Administrative Review Form

Off-site Review Procedures

The SA may utilize any pertinent information derived from Administrative Review activities during the SSO monitoring visit. For example, a SA may evaluate Food Safety and Civil Rights compliance during the Administrative Review. Elements of these areas may apply to the SSO operation, and therefore, the SA would not need to reassess these areas separately during a SSO monitoring visit. The SA may also review menus and production records off-site prior to the on-site visit.

Site Eligibility

A variety of sites may serve children meals under the SSO (see Text Box).

When applying to operate the SSO, SFAs must provide data to the SA to establish site eligibility. The SA must ensure that the SFA maintains this documentation. For sites that serve free meals based on area eligibility, the SA must ensure that the SFA maintains documentation that the site is located within the geographical boundaries of a school in which 50% or more of the enrolled students are certified eligible for free or reduced price meals, based on income eligibility applications or other documentation of categorical eligibility. SFAs may also use census data to establish eligibility for SSO sites. FNS must approve other sources of data SAs may use to determine eligibility. See SP 08 CACFP 04 SFSP

What types of sites can operate the Seamless Summer Option?

FNS allows the following types of sites to operate the SSO:

- **Open site:** A school or non-school site located within the geographical boundaries of a school where at least 50% of enrolled students are eligible for free and reduced price school meals. SAs may also approve open sites based on census data. All meals are served and reimbursed at the free rate at open sites.
- **Restricted open site:** A site that meets the open site criteria explained above, but is restricted for reasons of safety, control, or . All A meals are served and reimbursed at the free rate at restricted open sites.
- **Closed enrolled site:** A site that meets the 50% criteria, explained above, but serves only children in a specific program or activity. All meals are served and reimbursed at the free rate. Academic summer school programs may not participate as closed enrolled sites.
- **Migrant site**: A site that serves children of migrant families, as certified by a migrant.coordinator. All meals are served and reimbursed at the free rate
- **Camps:** A residential or non-residential day camp that offers regularly scheduled food service as part of an organized program for enrolled children. Eligibility.E must be established for each child enrolled based on information from their schools, household income applications, or direct certification..Meals are served and reimbursed at the free rate for students eligible for free or reduced price meals; paid meals are not reimbursed.

Note: Meals at all approved SSO sites, except for camps, must be served free of charge to all children. SFAs that sponsor camps may charge for the meals served to children who are not eligible to receive free or reduced price meals.

03-2017, *Area Eligibility in Child Nutrition Programs,* for more information.

At sites where eligibility is based on household income applications or direct certification (e.g., camps), the SFA must collect and maintain appropriate documentation of individual children's eligibility. The SFA may receive reimbursement only for meals served to children through age 18 who are eligible for free or reduced price meals. SFAs will receive reimbursement at the free rate for meals served to children certified as eligible for free or reduced price meals. No reimbursement is provided for meals served to children who are eligible for paid meals at these sites.

Age/Grade Groups

SFAs offering the SSO should make every effort to follow age/grade group meal pattern requirements. However, SFAs operating open and restricted open sites having difficulty implementing the age grade/group requirements may work with their SASA to make accommodations, which may include the use of a single age/grade group meeting the minimum meal pattern requirements for the most common age/grade group attending the site. This holds true for both school and non-school sites. All accommodations must possess a reasonable justification for the need to deviate from age/grade group requirements. Modifications to age/grade group requirements must be included as an addendum to the agreement between the SFA and SASA.

These accommodations only apply to open and restricted open sites where meals are served to all children in the community on a first come, first serve basis. All sites that serve an identified group of students, including closed enrolled sites and camps, must follow the age/grade group requirements outlined in 7 CFR 210.10 and 7 CFR 220.8.

While SSO closed enrolled and camp site operators that serve multiple age/grade groups may not offer meals under a single age/grade group, these sites do have some flexibility. SSO sites

can meet the requirements of breakfast for grades K-12 by offering food quantities that fit all grade groups.

At lunch, meal requirements for grades K-8 can be combined into a single menu with 8-9 oz. equivalent of grains/week, 9-10 oz. equivalent of meat/meat alternates/week, average daily calorie range 600-650, and average daily sodium limit less than 640 mg. Grades K-8 and 9-12 may use the same basic menu by adding slightly more grains and meat/meat alternates for the older children. More detailed information on how to create menus that meet the requirements of multiple age/grade groups can be found in SP 10-2012 (v.9).

Advertisement

The SA must ensure that the SFA makes a reasonable effort to advertise the availability of free meals and the site location to children in the community, and that all advertising materials contain the required non-discrimination statement. Refer to Section V: *General Program Compliance*, Module: *Civil Rights*, for the most current version of the nondiscrimination statement.

SFA Self-Monitoring

SFAs are required to review all SSO sites at least once per year, during operation of the SSO. The SA must examine the SFA's self-monitoring forms to ensure required self-monitoring takes place.

On-site Review Procedures

Meal Counting & Claiming

When observing meal counting and claiming, SAs must:

- Observe at least one meal service
- Count the number of reimbursable meals served at the actual point-of-service; only count complete meals served to children

- Assess the site's procedures for counting and claiming by comparing meal counts on the day of review to the last full week of operation from the review period
- Ensure camps claim free reimbursement only for meals served to free or reduced price-eligible children
- Determine whether the site transfers each child's eligibility status accurately to the roster. The SA could compare, for example, the point-of-service meal counts to the benefit issuance roster to ensure compliance

If the SA identifies problems with counting and claiming, the SA must validate the site's most recent claim.

In year-round SSO sites, the school or site must differentiate between SSO meals and NSLP/SBP meals.

Menu Planning & Meal Service

The SFA must plan meals using the same requirements as the NSLP/SBP.

When assessing the meal service, the SA must:

- Complete the Meal Component Worksheet for one week of menus from the review period or current operating year for all meals offered
- Review menus and production records to determine how meals contribute to meal pattern requirements (refer to Section III, *Meal Pattern and Nutritional Quality*, Module, *Meal Components and Quantities*, for additional information)
- Assess how the site differentiates between age/grade groups and provides age-appropriate meals
- Ensure children eat meals on-site, except where otherwise permitted by the SA
- Ensure the site serves all eligible children in attendance one meal before offering children a second meal

- Verify the site has proper food safety measures in place (refer to Section V, *General Program Compliance*, Module: *Food Safety*, for additional information)
- Make sure the site serves meals during the meal service times approved by the SA
- If applicable, make sure the site makes alternate arrangements for meal service in inclement weather

Note: A nutrient analysis is not required for a SSO review; therefore SAs are not required to complete the *Dietary Specifications Assessment Tool*.

SFAs may allow Offer versus Serve at SSO sites, but FNS does not require it. As in NSLP, second lunches are not reimbursable. SFAs must plan for and prepare breakfasts on the basis of participation trends, with the objective of providing one breakfast per child per day. However, sites may serve any excess breakfasts as seconds to eligible children and Claim for Reimbursement in accordance with 7 CFR 220.9.

Technical Assistance/Corrective Action

The SA must require corrective action and provide technical assistance for all problems it identifies to bring the SSO operation into compliance. Effective technical assistance includes helping the site manager identify deficiencies and necessary corrections to ensure the site does not repeat errors.

For all findings, SAs must follow the same corrective action and technical assistance procedures that apply to the NSLP and SBP.

SAs must provide technical assistance if a SA finds that the SSO site does not take steps to differentiate between age/grade groups. For example, the site may post signs instructing students in specific age/grade groups which meals and/or components to select.

Fiscal Action

The SA must assess fiscal action for all critical violations identified during SSO monitoring. FNS requires fiscal action as described below. For additional information, refer to Section VIII, *Fiscal Action*.

Site Eligibility & Meal Counting/Claiming

For site eligibility and/or meal counting and claiming problems, the SA must evaluate the specific problem and site requirements, and assess fiscal action. For example, if a SA finds that a camp claims paid meals for reimbursement, the SA would reclaim or disallow the reimbursement for paid meals.

Meal Components

A SA is required to take fiscal action when a meal component is missing. The SA must also require the SFA and/or school reviewed to take corrective action for the missing component. If corrective action occurs, the SA may limit fiscal action from the point corrective action begins back through the beginning of the review period for errors identified in 7 CFR 210.18 (g)(2).

Performance-based Certification Funding (6 cents)

If the Administrative Review finds that significant noncompliance exists; the SA must use its best judgment to assess the longevity and severity of the problem(s). If the problem(s) cannot be fixed immediately, the SA must require the SFA to develop and implement a Corrective Action Plan over an extended period of time. If the SA determines that the performance-based reimbursement should be terminated, it should be terminated beginning the month following the on-site Administrative Review and, at State discretion, for the month of review. Previously paid performance-based reimbursement would only be recovered in circumstances of clearly egregious or willful noncompliance by an SFA.

Performance-based reimbursement may resume beginning in the first full month the SFA demonstrates to the satisfaction of the State agency that corrective action has taken place.

When the performance-based reimbursement is terminated, and the SFA operates both NSLP and the SSOSSO, refer to Section VIII, *Overview of Fiscal Action*, Module: *Duration of Fiscal Action*, Performance-based Reimbursement.

Module: Fresh Fruit and Vegetable Program

Intent/Scope of Monitoring

The Fresh Fruit and Vegetable Program (FFVP) aims to increase children's exposure to and consumption of a variety of fruits and vegetables. The review of the Programs to ensure participating schools are proper stewards of Federal funds and operate the Program as prescribed by FNS.

To evaluate compliance, the SA must:

- Use the prescribed methodology to establish the FFVP school review sample size
- Validate one Claim for Reimbursement for each FFVP school selected for review (e.g., review supporting documents such as invoices)
- Observe the FFVP in each of the schools selected for review, if applicable

This monitoring area falls under the General Area of the Administrative Review.

Review Procedures

FFVP Site Selection Methodology

Of the schools selected for an Administrative Review, the SA must select FFVP schools for a FFVP review based on the table below.

Number of Schools Selected for an NSLP Administrative Review That Operate the FFVP	Minimum Number of FFVP Schools to be Reviewed
0 to 5	1
6 to 10	2
11 to 20	3
21 to 40	4
41 to 60	6
61 to 80	8
81 to 100	10
101 or more	12*

* Twelve plus 5 percent of the number of schools over 100. Fractions must be rounded to the nearest whole number.

For example:

Twenty schools within SFA are selected for an NSLP Administrative Review. Of the 20 schools selected, 7 also operate the FFVP. Using that information in concert with the above chart, the SA would review two of the seven FFVP schools also selected for an NSLP Administrative Review.

Note: FFVP school selection is determined by the NSLP schools selected for review and occurs after the NSLP school selection process has been completed. NSLP schools selected for review are either: chosen automatically under the requirements of 7 CFR 210.18(e)(1) and (e)(2)(i); chosen according to SA discretionary criteria under 7 CFR 210.18(e)(2)(ii); or chosen using a combination of the two options. When none of the schools selected for an NSLP Administrative Review operate the FFVP, but the FFVP operates at another school (or other schools) within the SFA, the State agency must follow the procedures below to ensure that at least one FFVP school is reviewed during an NSLP Administrative Review.

1. When the NSLP schools selected for review are comprised solely of schools chosen automatically under the requirements of 7 CFR 210.18(e)(1) and (e)(2)(i), the SA will have to review the FFVP at a school that is not receiving an Administrative Review. FFVP is the only program that would need to be reviewed at this additional school.

2. When the NSLP schools selected for review are comprised solely of schools chosen according to SA discretionary criteria under 7 CFR 210.18(e)(2)(ii), the SA will have to replace one of the schools selected for an Administrative Review with a school that has similar characteristics that operates the FFVP. If that is not possible, use the process identified in number 1 above.

3. When the NSLP schools selected for review are comprised of schools chosen both automatically under the requirements of 7 CFR 210.18(e)(1) and (e)(2)(i) and according to SA discretionary criteria under 7 CFR 210.18(e)(2)(ii), the SA will have to replace one of the schools selected for Administrative Review according to SA

discretionary criteria with a school that has similar characteristics that operates the FFVP. If that is not possible, use the process identified in number 1 above.

Off-site Review Procedures

Claim Validation

The SA must validate one Claim for Reimbursement for each FFVP school selected for review. FNS strongly recommends that the SA complete the claim validation off-site. However, claim validation can occur on-site as well. The SA may select any month in which a school has submitted a claim in the current school year. The SA does not have to select the same claim month for each of the FFVP schools selected for review. If a school has not submitted a claim for the current school year, the SA must select a claim from the previous school year.

Once the SA receives this information, the SA proceeds to validate the school's FFVP Claim for Reimbursement for the selected month. The SA must compare the total cost claimed for reimbursement against the total cost established by the supporting cost documentation.

If these two totals are the same and the reported costs are allowable, then the SA validates the claim and the FFVP school is compliant with this review element. If these two totals are not the same or contain unallowable costs, then the SA does not validate the claim and the FFVP school is out of compliance with this review element.

While examining the supporting cost documentation during the claim validation process, the SA must ensure the documentation indicates the following:

- The school uses the majority of funds to purchase fresh produce
- The school carefully reviews and prorates equipment purchases
- Labor costs and all other non-food costs are minimal

The SA must provide technical assistance if the documentation is not consistent with the requirements listed above.

Prior to completing the claim validation, the SA must examine payment system records for the year-to-date administrative costs charged to each reviewed school's total FFVP grant. The SA must ensure that each school is on track to charge no more than 10% of the total grant to administrative costs.

Note: If the SA validates FFVP claims when the FFVP claim is submitted for payment, further claim validation during an Administrative Review is not required.

On-site Review Procedures

On-site Review Form

The SA must record findings in Questions 1900-1902 (review period) and 1903-1910 (day of review) on the *On-site Assessment Tool*.

On-site Review

The SA must observe the FFVP operation in each of the selected schools. While the FFVP food service may occur in multiple locations within a participating school, the SA is only required to observe one location. Visits to additional classrooms or other service locations (e.g., kiosks, vending machines, school hallways) are at the SA's discretion. Through the course of the observation, the SA must use the statements below to determine whether the school operates the FFVP properly on the day of review.

- The FFVP is available to all enrolled children
- The FFVP is provided to students free of charge
- The school offers FFVP within the school day, but outside the meal service times of the NSLP and SBP
- The school widely publicizes the FFVP

- The school does not allow frozen, canned, dried, and other types of processed fruits to be served as part of the FFVP
- The school does not allow the following products: fruit/vegetable juice; cottage cheese; nuts or trail mix; fruit or vegetable pizza; fruit/vegetable smoothies; fruit strips, fruit drops, or fruit leather (see the FNS *FFVP Handbook* for a more exhaustive list)
- If the school provides dip, the dip is for vegetables only and is either low-fat or fat-free. Schools may provide no more than two tablespoons of dip per child
- The school does not provide fresh fruits and vegetables to adults except for teachers who are in the classroom and participating with students during the FFVP food service. See FNS Memorandum SP 08-2011, *Teacher Modeling in the Fresh Fruit and Vegetable Program (FFVP)*
- The school offers cooked vegetables no more than once per week and only when included as part of a nutrition education lesson.
- The FFVP food service follows HACCP principles and applicable sanitation and health standards. Refer to Section V: *General Program Compliance*, Module: *Food Safety* for further information.

The SFA is compliant with this review element if the SA's observations on the day of review at each of the FFVP schools selected for review correspond to the statements above. If the SA's observations at any of the FFVP schools contradict the statements above, the SA will deem the SFA noncompliant with this review element and the SA must issue appropriate corrective action.

Corrective Action

The SA will deem an SFA noncompliant if the SFA does not meet any of these requirements. The SA must issue corrective and fiscal action to bring the SFA into compliance.

The SA may suspend or terminate the FFVP in an SFA or school for repeated failure to meet program requirements, as documented by the SA.

All deficiencies must be recorded on the *On-site Assessment Tool* in the applicable comments section. Technical assistance and corrective action to correct identified deficiencies must be included in the Corrective Action Plan provided to the SFA at the exit conference. FFVP errors are recorded on the *School Data and Meal Pattern Error,* Form S-1, Line 21.

Fiscal Action

The SA must disallow any portion of a Claim for Reimbursement and recover any payment made to an SFA that was not properly payable according to FFVP requirements. Unsupported costs and/or unallowable costs must be recorded on the applicable *Fiscal Action Workbook.*

Module: Special Milk Program

Intent/Scope of Monitoring

The Special Milk Program (SMP) provides milk to children in schools, residential child care institutions, and eligible camps that do not participate in other Federal child nutrition meal service programs. The Program reimburses schools and institutions for the milk served to eligible children. Schools participating in the NSLP or SBP may also participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs.

The intent of monitoring the SMP is to determine whether the SFA is operating the program in compliance with regulatory requirements and in accordance with the SA-approved agreement. The SA must examine SMP documentation for each school selected for the Administrative Review that operates the SMP. On-site observation of the SMP is only required if issues are discovered during the documentation review or with meal counting and/or claiming of the NSLP or SBP.

If a school selected for an Administrative Review does not operate the SMP, the SA does not have to select another site for the purposes of reviewing the SMP.

Review Procedures

The SA must evaluate the pricing policy, counting and claiming, milk service procedures, and recordkeeping in SMPs operating in the sites selected for the Administrative Review, if applicable. The SA review of the SMP may be conducted off-site or on-site, at SA discretion.

Assessment Form

The SA must complete the *Supplemental Special Milk Program Administrative Review Form* either off-site, through telephone contact or e-mail, or on-site.

To evaluate compliance, the SA must:

- Review the pricing policy
- Confirm the SFA is operating its approved SMP option
- Make sure counting and claiming procedures yield accurate claims
- Determine that records are retained for three years or until resolution of audits

Pricing, Counting, and Claiming

The SA must ensure that:

- The school prices milk in accordance with FNS policy
- The school/SFA maintains documentation that supports the number of milks it serves daily and claims for reimbursement
- Milk orders and delivery records support the number of milks claimed for reimbursement
- The purchase price of milk on the most recent Claim for Reimbursement matches the purchase price reflected on invoices
- The SFA provides an accurate count of milks served each month at each school to the SA by the established due date for the monthly reimbursement claim
- The SFA transfers eligibility status of each student accurately to the roster; the SA may do this by comparing the point-of-service milk counts by student/benefit category to the benefit issuance roster to ensure that students receiving free milks are listed as eligible on the benefit issuance roster
- The SFA retains records for three years

Refer to Section II: *Meal Access & Reimbursement*, Module: *Meal Counting and Claiming* for more in-depth guidance regarding counting and claiming.

On-site Review Procedures

On-site observation of the SMP is only required if issues are discovered during the SMP documentation review or with meal counting and/or claiming of the NSLP or SBP.

On-site Assessment Form

Special Milk Program Review Administrative Review Form

On-site Special Milk Program Service Observation

When observing the milk service, the SA must verify information obtained during the documentation review. In addition, the SA must observe milk service to ensure that:

- The school takes a point-of-service milk count and records milk correctly
- Milk counts by category for the day of review do not vary unreasonably in comparison to the previous five days

Technical Assistance/Corrective Action

The SA must provide technical assistance and require corrective action for all problems it identifies to bring the SMP operation into compliance. Effective technical assistance includes helping the SFA identify deficiencies and necessary corrections to ensure the school/SFA does not repeat errors.

The SA must record errors on the *Supplemental Special Milk Administrative Review Form* and the *On-site Assessment Tool* (Question 2000).

Fiscal Action

SAs must take fiscal action for any Claim for Reimbursement that is not properly payable. FNS requires fiscal action for all certification and counting and claiming errors.

The SA must record counting and claiming errors on *School Data and Meal Pattern Error,* Form S-1, Line 23.

Section VII: Post-Review Procedures

The Modules in this Section are:

- Administrative Review Exit Conference
- Administrative Review Report
- Documented Corrective Action

Module: Administrative Review Exit Conference

Intent/Scope

At the conclusion of the on-site portion of the Administrative Review, the SA must hold an exit conference to notify SFA staff of any program violations identified, the extent of the violations, and a preliminary assessment of the actions needed to correct the violations. The SA must address appropriate deadlines for completion of corrective action.

Corrective Action Plan

The exit conference is an opportunity to establish an agreed-upon Corrective Action Plan that identifies the needed corrective action and the timeframes for those actions. To achieve the desired result, the SA must allow for SFA input on corrective action approaches and must offer technical assistance for deficiencies cited.

The Corrective Action Plan must identify the following:

- The identified finding(s)
- The corrective action(s) required
- The timeframe(s) by which the corrective action(s) must be completed
- Any documentation the SA expects the SFA to provide to demonstrate corrective action was completed

Documented Corrective Action

The SA must explain to the SFA that corrective action determines the extent of the fiscal action taken, and stress the importance of implementing corrective action in a timely manner. The SA should make every effort to provide the SFA with a summary of the noted compliance areas to facilitate the immediate development of corrective action. The SA may accept documented corrective action at the time of the Administrative Review, or the SFA may submit documented

corrective action as described in the Module: *Documented Corrective Action* found later in this Section.

Fiscal Action

The SA should explain how fiscal action is calculated. The SA has the option to discuss a potential claim amount. The SA should explain that withholding of payments results if the SFA does not take corrective action. If applicable, the SA should explain the SFA's right of appeal. (7 CFR 210.18(j))

If the SA will review the SFA's SSO during the upcoming summer, the SA should remind the SFA that there *may* be fiscal action resulting from the SSO review. If that is the case, the amount of fiscal action for the NSLP and SSO reviews must be combined to determine whether the $600 disregard in 7 CFR 210.19(d) can be applied to any overclaim.

Performance-Based Reimbursement

If Administrative Review findings initiate, fail to initiate, or terminate the SFA's receipt of the performance-based reimbursement, the SA must notify the SFA at the exit conference and in the Administrative Review Report. The SA must also tell the SFA when the performance-based reimbursement will be initiated or terminated.

If findings fail to initiate, or result in termination of, the performance-based reimbursement, the SA must provide technical assistance and ensure the SFA understands steps that must be taken to initiate or reinstate the performance-based reimbursement.

Cooperative Effort

The SA should acknowledge the cooperation of all persons involved in the review process, and inform the SFA as to when it can expect to receive the notification letter reporting review results.

Module: Administrative Review Report

Intent/Scope

After the review/exit conference, the SA must provide written notification of the review findings (i.e., the Administrative Review Report) to:

- the SFA's Superintendent (or equivalent in a non-public SFA) or authorized representative; and
- the Food Service Director.

The SA has the option to combine the written notification with the letter of claim adjustment/notice of appeal if the SFA has already completed corrective action.

Required Content

Required and suggested content items follow. An asterisk* indicates required items.

- Team composition and leader
- Appreciation and commendation to school personnel who participated in the review
- Restatement of purpose of review and description of review process
- Name and telephone number of SA contact person
- Review findings (including those uncovered after the exit conference)*
    - FNS recommends that, if findings are identified after the exit conference, the SA notify the SFA of the findings prior to issuing the Administrative Review report
- Whether the performance-based reimbursement will be initiated, maintained, or terminated based on review findings
    - If findings fail to initiate, or result in termination of, the performance-based reimbursement, the SA must provide technical assistance and ensure the SFA

understands steps that must be taken to initiate or reinstate the performance-based reimbursement

- The Corrective Action Plan identifying corrective actions, timeframes for the completion of corrective action, instructions to document corrective action taken by the SFA, and an indication that findings must be corrected system-wide*
- Timeframes for completion of the corrective action*
- Potential for fiscal action provided in general or specific terms*
- Date(s) of review and date of exit conference*
- Description of the SFA's right to appeal the denial of all or a part of the Claim for Reimbursement or withholding of funds
- Possibility of a follow-up review should corrective action not be completed or to verify corrective action was completed system-wide, as appropriate

Timeframes

The SA should issue the Administrative Review Report within 30 calendar days of the date the exit conference was conducted. In rare situations when an SFA is found to be significantly out of compliance with multiple program areas and/or the SA or SFA runs into extenuating circumstances, the report may take up to 60 calendar days.

Posting of the Administrative Review Report Summary

The SA is responsible for ensuring that information regarding Administrative Reviews is made easily accessible to all members of the public. SAs must publicly post a summary of the Administrative Review Report for each SFA on the SA's publicly available website. A summary of the report must be posted no later than 30 days after the SA provides the final results of the Administrative Review to the SFA. The SA must also make a copy of the final Administrative Review Report available to the public upon request. In addition, the SA has the discretion to strongly encourage that SFAs post a summary of the report for each SFA and make the report available to the public upon request. The review summary must cover access and reimbursement (including eligibility and certification review results), an SFA's compliance with

the meal patterns and the nutritional quality of school meals, the results of the review of the school nutrition environment (including food safety, local school wellness policy, and Smart Snacks in Schools), compliance related to civil rights, and general program participation. At a minimum, the public posting of the report would include the written notification of review findings provided to the SFA as required above.

Module: Documented Corrective Action

Intent/Scope

In order for the SA to close out the Administrative Review for an SFA, it must obtain documented corrective action from the SFA for any degree of findings in either the Critical or General Areas that the SA identifies during an Administrative Review. Documented corrective action should also include any program violations identified outside the scope of an Administrative Review.

Unless the SFA provides documented corrective action at the time of the Administrative Review, the SFA must send written notification and supporting documentation to the SA certifying that it has completed the corrective action required for each finding, as well as corresponding dates of completion.

The SA makes the determination as to whether/when the SFA satisfactorily corrected a problem.

Timeframes

The SFA must postmark or submit documented corrective action to the SA no later than 30 calendar days after the established deadline for completion of each required corrective action, or as otherwise extended by the SA.

Extension of Corrective Action Timeframes

The SA may extend the timeframes established for corrective action upon written request (either electronically or hard copy) of the SFA if extraordinary circumstances arise where a SFA is unable to complete the required corrective action within the specified timeframes.

Closing the Administrative Review

Upon receipt of the SFA's documented corrective action, the SA should determine whether the documentation is complete and resolves the finding(s) identified. Once the SA approves corrective action, it should send a closure letter to the SFA closing the review within 30 calendar days of receipt of the documented corrective action.

Section VIII: Fiscal Action

The Modules in this Section are:

- Overview of Fiscal Action
- Fiscal Action Formula
- Withholding Payments
- Overpayment Disregard
- Letter of Claim Adjustment and/or Withholding of Payment Including Notice of Appeal

Module: Overview of Fiscal Action

Intent/Scope

Claims for Reimbursement must accurately reflect the number of reimbursable meals served to eligible children, by type, for any given day. When conducting an Administrative Review, SAs must identify the SFA's correct entitlement and take fiscal action when any SFA claims or receives more Federal funds than earned under 7 CFR 210.7. SAs should contact their FNS Regional Office if they need additional help or clarification with fiscal action.

Fiscal action means the recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid Claims for Reimbursement, submission of a revised Claim for Reimbursement, and correction of records to ensure that unfiled Claims for Reimbursement are corrected when filed. (7 CFR 210.19(c))

Each Section of the manual contains Module-specific information related to fiscal action, e.g., Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance*. The SA must be familiar with the information included within those Modules in addition to the information in this Section.

General Information

Timeframes Covered by Fiscal Action

Review Period

The review period is the most recent month for which a Claim for Reimbursement was submitted, provided that it covers at least ten (10) operating days. The Claim for Reimbursement is considered to be submitted once it has been mailed or provided to the SA.

Day of Review

The day of review is the day(s) on which the on-site review of the individual sites selected for review occurs. For purposes of fiscal action, the meal counts will come from the entire month in which the day of review occurs.

Special Circumstances

- Nutrient Analysis Outside of the Review Period

  In some cases, a nutrient analysis may need to be conducted for a week outside the review period. For example, a SFA may not have menu documentation for the weeks in the review period. See Section III: *Meal Pattern and Nutritional Quality*, Module: *Dietary Specifications and Nutrient Analysis* for additional information on assessing and recording fiscal action for Dietary Specifications violations identified outside the review period.

Duration of Fiscal Action

Fiscal action must be extended back to the beginning of the school year or that point in time during the current school year when the infraction first occurred for all violations of Performance Standards 1 and 2. Based on the severity and longevity of the problem, the SA may extend fiscal action back to previous school years, as applicable. (7 CFR 210.19(c)(2)(ii)).

Exceptions to the duration of fiscal action are described below:

Performance Standard 1:

- If corrective action occurs, the SA may limit fiscal action from the point corrective action occurs back through the beginning of the review period. (7 CFR 210.18(m)) However, for purposes of fiscal action, the SA-established certification and benefit issuance adjustment factor must be applied to the review period and month of on-site review regardless of when corrective action occurs for these errors. Refer to Certification and Benefit Issuance errors, Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance* for more information. ***This exception does not apply to Special

Provision Options. Refer to Fiscal Action, Section IX: Special Provision Options for more information.

- The SA need not take fiscal action for applications missing the name and signature of an adult household member if corrective action occurs within timeframes specified by the SA. (7 CFR 210.19(c)(6)).

Performance Standard 2:

- For food component violations under Performance Standard 2, the SA must take fiscal action and require the SFA and/or reviewed school to take corrective action for the missing component. If a Corrective Action Plan is in place, the SA may limit fiscal action from the point corrective action occurs back through the beginning of the review period.

If the SA finds any Performance Standard 2 lunch violations as described above, the SFA will not be eligible for the 6 cents per lunch reimbursement, as adjusted, with the beginning of the month following the on-site portion of the Administrative Review and, at SAs discretion, for the day of review month. SA must assess the severity and egregiousness of the violations identified in determining whether or not to terminate the 6 cent performance-based reimbursement. Performance-based reimbursement may resume beginning in the first full month the SFA demonstrates to the satisfaction of the SA that corrective action has taken place. (e.g. Review Period is March, Day of Review takes place April 15; performance-based reimbursement **must** be turned off beginning May 1 and **may** be turned off going back to April 1. Corrective Action occurs May 18, performance-based reimbursement **must** be turned back on starting June 1).

Performance-based reimbursement is only earned for lunches; therefore, the performance-based reimbursement is only terminated for lunch violations.

Performance-Based Reimbursement

When the performance-based reimbursement is terminated for either the NSLP or SSOSSO, it will remain turned off for **both** until corrective action occurs.

Fiscal Action Approach

The fiscal action formula, described below, results in a comparison between:

- the SA's assessment of the reimbursement to which a school(s) is entitled in a closed Claim for Reimbursement, based on production records, invoices, eligibility documents, and observation; and
- the Claim(s) for Reimbursement made by the school(s) for the same closed claim.
- A "Closed Claim for Reimbursement" means any month for which a Claim for Reimbursement was submitted. The review period is a Closed Claim for Reimbursement.

Fiscal action can also be calculated for an open Claim for Reimbursement using the same basic formula approach. However, since meals observed by the SA during this time have not yet been claimed, fiscal action cannot be calculated to recover funds. Instead, fiscal action is calculated by adjusting the SFA's uncorrected meal counts to ensure that the Claim for Reimbursement, when submitted by the SFA, is adjusted to account for all errors identified by the SA.

- An "Open Claim for Reimbursement" means any month for which a Claim for Reimbursement has not been submitted. The day of review occurs during an Open Claim for Reimbursement.

Calculating Fiscal Action for an Open Claim for Reimbursement

SAs, in conjunction with the SFA, must ensure that any Claim for Reimbursement is correct when filed. This means that the open Claim for Reimbursement must correctly reflect any adjustments resulting from the Administrative Review.

To ensure the Claim for Reimbursement is correct when filed, the SA must:

- Obtain the site's proposed total meal counts, by type, for the open Claim for Reimbursement. These counts must include all days of operation from the Open Claim for Reimbursement. All meal disallowances identified during the on-site portion of the review must be recorded for fiscal action for the open Claim for Reimbursement.

- Apply the fiscal action formula, which takes into account adjustments for consolidation errors and non-reimbursable meals, and identify the site's correct meal counts for the open Claim for Reimbursement.
- Notify the SFA of the correct meal counts and require that the SFA's Claim for Reimbursement reflect the corrected meal counts. For example, the SFA proposed meal counts are 1000 free, 500 reduced, and 200 paid. After completing the fiscal action process the SA determines meal counts should be 950 free, 400 reduced, and 198 paid.
- SFA's assessed fiscal action under the open claim option must still be provided appeal rights; however, any fiscal action assessed would not be considered for the $600 disregard. Since this approach corrects SFA/site meal counts prior to submission of the final claim for reimbursement the application of the $600 disregard is not allowable.

Note: The approach (Closed and/or Open) used to assess fiscal action is up to SA discretion. For example, the SA may choose to assess fiscal action for the review period and the month of the on-site review following the closed claim for reimbursement approach.

Fiscal Action Formula

The Module: *Fiscal Action Formula* describes the method used to determine fiscal action for the NSLP and SBP. The SA must calculate fiscal action separately for each program reviewed. The *Fiscal Action Workbook* provides separate tabs for standard scenarios, special provision options, and other errors for each program. The formula described below can be used to calculate fiscal action to recover funds for one or more claim periods, or to correct claims before they are submitted for reimbursement.

To apply the formula in standard situations, the SA must obtain the following information during the off-site/on-site reviews:

- The number of meals claimed by the site, by type (free, reduced price, and paid) (see S-1, lines 19 and 20).
- Upward or downward adjustments needed to the site's meal counts for the reviewed

schools, by type, due to counting or consolidation errors (see S-1, lines 13 and 17).

- The total number of non-reimbursable meals claimed by the reviewed sites (see S-1, lines 10, 11, 12, 14, 15, and 16).
- The total amount of undocumented or unallowable FFVP costs at the reviewed sites. (see S-1, line 21).
- The total amount of upward or downward adjustments to the NSLP Afterschool Snack site's claim for reimbursement (see S-1, line 22).
- If reviewing SMP, the total amount of disallowances (see S-1, line 23).
- The SFA's count of reviewed students eligible for free and reduced price meals (see SFA-1, line 4A).
- The SA's independent count of reviewed students eligible for free and reduced price meals (see SFA-1, line 4B).

To apply the formula in Special Provision Option situations, the SA must obtain the following information during the Administrative Review:

- The total number of meals claimed by the site by type (see S-1, lines 19 and 20).
- The total upward or downward adjustments needed to the site's meal counts by type due to counting or consolidation errors (see S-1 lines, 13 and 17).
- The total number of non-reimbursable meals claimed by the site (see S-1, lines 10, 11, 12, 14, 15, and 16).
- The total amount of undocumented or unallowable FFVP costs at the reviewed sites (see S-1, line 21).
- The total amount of upward or downward adjustments to the NSLP Afterschool Snack site's claim for reimbursement (see S-1, line 22).
- For Provision 2, the SFA's applied and SA's validated free, reduced, and paid claiming percentages (see SFA-1A, lines B and C).
- For Provision 3, the SFA's applied and SA's validated funding levels (see SFA-1A. lines D and E).

- For the Community Eligibility Provision, the SFA's and SA's validated free and paid claiming percentages (see SFA-1A, lines B and C). Please note that only the free and paid fields will be entered.

NOTE: If the only eligibility determination errors made were from changing the determination from the reduced price category to the free category then the SA has the discretion to do one of the following:

1) Not take fiscal action for the eligibility determination error amount, as indicated in the Fiscal Action Workbook; or

2) Adjust the closed Claims for Reimbursement upward provided that the households affected have been reimbursed for the difference in meal price between reduced price and free meals for the meals the household purchased. The amount of the upward adjustment should be calculated outside of the Fiscal Action Workbook and be based on the number of students identified as categorized incorrectly and the number of meals that were served to these students. Before the upward adjustment to Claims for Reimbursements can occur the reimbursement to the affected households must be validated.

SFA-Wide Fiscal Action for Performance Standard 1, Certification and Benefit Issuance Review Errors

Fiscal action, when part of corrective action, is applied SFA-wide, consistent with 7 CFR 210.18(l)(1), because the certification and benefit issuance review assesses compliance at the SFA level and not just at the reviewed schools. This ensures program integrity by assessing fiscal action for certification errors at all sites, as well as for systemic errors within the entire SFA. However, FNS has allowed flexibility for situations where the certification and benefit issuance review error threshold does not exceed 3%. If the 3% error threshold is not exceeded, SA's have the flexibility to not assess fiscal action at the SFA level and also have the discretion to not apply fiscal action to the reviewed sites either. This discretion applies to certification and benefit issuance review errors only and any other errors requiring fiscal action must still be assessed at the reviewed sites and if appropriate, at the SFA level. If the certification and

benefit issuance review error threshold exceeds 3%, the SA must assess fiscal action SFA wide. This can be accomplished by entering SFA level information into the Fiscal Action Workbook, or SA's utilizing site based claiming, by entering each individual site from the SFA, including non-reviewed sites, into the Fiscal Action Workbook.

The SA should work in consultation with its FNS Regional Office on these situations. The actions described above will be documented as a finding as a part of the final Administrative Review report and the associated Corrected Action must be validated.

Consolidation Errors at SFA Level

SFA consolidation and meal claiming errors are recorded on the *Fiscal Action Workbook*. When recording consolidation errors in the Fiscal Action Workbook the SA only assesses the consolidation error once, either at the site level or at the SFA level, whichever is most appropriate. Refer to Section II: *Meal Access and Reimbursement*, Module: *Meal Counting and Claiming* for more information on the monitoring of meal counting and claiming.

Fiscal Action for SPOs: Special Provision Schools

- **For Provision 1 schools, Provision 2 and 3 schools establishing a Base Year, and for schools using Provision 2 or 3 in the SBP only**, the SA must follow the procedures described in Section II: *Meal Access and Reimbursement* for evaluating certification and benefit issuance in applying fiscal action. All free and reduced price eligible students in the SFA will be included in the statistically valid sample or 100% certification and benefit issuance review.
- **For Provision 2 and 3 schools operating in a Non-Base Year and/or SFAs or schools operating Community Eligibility Provision**, special accommodations are made for evaluation certification and benefit issuance when applying fiscal action. These accommodations and other requirements for reviewing these schools are described in Section IX: *Special Provision Options.*

Other Errors

Each Fiscal Action Workbook contains formulas to calculate fiscal action for non-standard situations and fields to record fiscal action for other program areas including FFVP and Afterschool Snack Service.

Note: Fiscal Action is recorded for the Special Milk Program (SMP) separately on its own tab included in the *Fiscal Action Workbook*.

Recalculation

Claims for Reimbursement must accurately reflect the number of reimbursable meals, by type, for any given day. If the SA identifies problems resulting in incorrect claims, the SA must identify the SFA's correct entitlement and apply fiscal action.

Generally, SAs have sufficient information to make appropriate adjustments to meal counts to ensure the meal counts reflect only reimbursable meals served to eligible students. However, there are situations in which SAs must recalculate meal counts based on additional or more reliable information in order to assess fiscal action.

Recalculation procedures

Securing a meal counting and claiming system that yields correct claims and obtaining a correct count of the number of reimbursable meals may pose challenges that require a partial or full recalculation.

- Partial recalculation — In situations in which a non-systemic problem is identified as resulting in unreliable or incomplete meal counts, the SA may conduct a partial recalculation. In this case, the SA may look at data from past serving days with similar menu items to re-establish the meal count, by type and/or the total meal count for the day of review. Once reliable data are obtained, the recalculated meal claims by category are then subject to the fiscal action formula.

- Full recalculation — In situations in which systemic problems exist and meal counts by type and/or total meal counts are unreliable or incomplete, the SA must conduct a full recalculation. In order to conduct a full recalculation, the SA must provide technical assistance and require corrective action, SFA-wide, to ensure the SFA understands and implements the corrective action, which results in an acceptable meal counting and claiming system. Depending on the severity of the problem, the SA may want to validate the corrective actions through a follow-up technical assistance visit.

  Once the SA is satisfied that the issues have been resolved, the SFA must provide meal counts for 30 consecutive operating days from the noncompliant site going forward. The total meal counts, by category, then need to be normalized to adjust for seasonal/monthly trends in participation by multiplying them by a normalization factor based on nationwide historical daily participation data. The *Fiscal Action Workbook* automatically calculates these recalculated and normalized claims based on the number of serving days in the claim period being recalculated. The recalculated meal claims by category are then subject to the standard fiscal action Formula.

  This process will be applied to every closed claim for reimbursement from the current school year that is identified by the SA as being unreliable.

Note: When recalculation is required in the NSLP Afterschool Snack Service or the Special Milk Program, the proper method of either full or partial recalculation should be used, depending on the violations identified.

Note: When recalculating and assessing fiscal action, the SA must not disallow more meals than were originally claimed.

Fiscal Year Integrity

When calculating fiscal action, SAs must calculate fiscal action for each fiscal year separately. The SA must maintain Federal fiscal year integrity when taking the claim (i.e., the claim must be recovered from a period in the same fiscal year as the error(s) was identified).

60/90 Day Reporting

Fiscal action resulting from an Administrative Review does not have to comply with the 60/90 day claims reimbursement reporting requirements as defined in the *60/90 Guidance*, as amended.

Note:

- Violations identified in the off-site assessment are eligible for fiscal action; however, if not corrected by the completion of the on-site review, these violations will not be considered repeat violations as they have occurred within a single Administrative Review.
- The State Agency may not impose Federal fiscal action for federally allowable actions that are violations of State law. However, if a State opts to impose a State violation, they may do so, but they must make clear to the SFA that the fiscal action associated with the violations is State-imposed, not federally imposed.

Module: Fiscal Action Formula

Intent/Scope

The fiscal action formula listed below applies to any Claim for Reimbursement with errors in the following areas:

- Reimbursable meals
- Certification and benefit issuance
- Meal counting, consolidation, and claiming

General Information

The following terms are used in the Fiscal Action formula.

"Reimbursable meals" means meals meeting Program requirements. Refer to Section II: *Meal Access and Reimbursement*, and Section III: *Meal Pattern and Nutritional Quality* for more information.

"Reviewed school" means the school(s) selected for review using the school selection procedures identified in Section I: *Pre-Visit Procedures*.

"Reviewed students" are the students actually selected for the certification and benefit issuance review under Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance*. If the SA opted to review eligibility determinations for 100 percent of the free and reduced price students on the SFA's point-of-service benefit issuance document(s) for all schools under its jurisdiction, "reviewed students" would mean 100% of the free and reduced price students on the SFA's benefit issuance documents. If the SA opted to review a statistically valid sample of the free and

reduced price students on the benefit issuance documents for all schools under the SFA's jurisdiction, "reviewed students" would be the students selected for the sample. For example, the SA selected a sample of 450 student certifications for review, and these would be considered the reviewed students.

Calculating Fiscal Action: NSLP Standard and SBP Standard

This formula is used to calculate fiscal action using the NSLP Standard and SBP tabs of the *Fiscal Action Workbook*. This tab is used to calculate fiscal action for NSLP and SBP standard meal counting and claiming sites, to include base year Provision 2 or 3 sites.

Note: SAs must select the "Period" option (Review Period, Day of Review, Other, or All) in the NSLP Standard Tab for which fiscal action is being calculated. SAs have the option of completing the appropriate tabs of the Fiscal Action Workbook for all periods separately or by selecting the "All" option and entering all periods together.

Step 1: Establish SFA count of students eligible for free and reduced price meals

The purpose of Step 1 is to identify the number of students the SFA has certified for free and reduced price meals, respectively. This count is derived from the number of students reviewed for certification and benefit issuance. Refer to Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance*.

a) The SA must record the SFA's count of the number of reviewed students the SFA certified for free and reduced price meals on the *Fiscal Action Workbook*, Block 1. (See SFA-1, line 4A)

> **For Example:**
> The SA conducted a statistically valid sample of the universe (i.e., the point-of-service benefit issuance document(s) for each school within the SFA). Therefore, of the 2,600 students receiving free or reduced price meals within the SFA, the SA reviewed certification documentation for 335 eligible students (a 95 percent confidence level). (See Section II: *Meal Access and Reimbursement*, Module: *Certification and Benefit Issuance* for more information on statistically valid samples.)
>
> SFA count of certified free = 250
> SFA count of certified reduced price = 85

Step 2: Establish SA count of students eligible for free and reduced price meals

The purpose of Step 2 is for the SA to independently determine a count for the number of students correctly certified as eligible for free and reduced price meals, based on the certification and benefit issuance documentation under review (i.e., the reviewed students).

The SA must record its count for the number of students correctly certified for free and reduced price meals on the *Fiscal Action Workbook*, Block 2. (See SFA-1, line 4B)

For Example:

SA count of certified free = 210
SA count of certified reduced price = 75

Step 3: Establish the certification and benefit issuance adjustment factor

The purpose of Step 3 is for the SA to determine the certification and benefit issuance adjustment factor. This factor is intended to adjust the number of reimbursable meals by benefit type to reflect the SA's determination of the number of students that should be certified as free or reduced price. **Note**: This takes into consideration both the certification and benefit issuance process as outlined in Section II: *Meal Access and Reimbursement,* Module: *Certification and Benefit Issuance*.

The certification and benefit issuance adjustment factor is the ratio of the SA count of students certified as eligible for free or reduced price meals, respectively, divided by the SFA count of students certified as eligible for free or reduced price meals, respectively. The resulting ratio represents the certification and benefit issuance adjustment factor for free or reduced price meals. Note that the calculation of the adjustment factor does allow for upward adjustments to credit the free and reduced price meal count totals.

(a) Adjustment Factor for Free Meals — The certification and benefit issuance adjustment factor for free meals is automatically calculated and recorded on the *Fiscal Action Workbook* (Block 9B).

Number of students certified by the SA to be eligible for free meals
÷ Number of students certified by the SFA to be eligible for free meals
= Certification and benefit issuance adjustment rate for free meals

For Example:

210 students certified by SA for free meals
÷ 250 students certified by SFA for free meals
0.840 certification and benefit issuance adjustment factor for free meals

(b) Adjustment Factor for Reduced Price Meals — The certification and benefit issuance adjustment factor for reduced price meals is automatically calculated and recorded on the *Fiscal Action Workbook* (Block 9C).

Number of students certified by the SA to be eligible for reduced price meals
÷ Number of students certified by the SFA to be eligible for reduced price meals
= Certification and benefit issuance adjustment factor for reduced price meals

For Example:

75 students certified by SA for reduced meals
÷ 85 students certified by SFA for reduced meals
0.882 certification and benefit issuance adjustment factor for reduced price meals

Step 4: Determine the correct count of reimbursable meals at the reviewed school(s)

The purpose of Step 4 is to determine the total number of reimbursable meals at each site. To obtain the total number of allowable reimbursable meals, the SA must enter the uncorrected meal counts on the *Fiscal Action Workbook*, Block 4. (See S-1, lines 19 for day of review and 20 for review period.) These counts are then adjusted, by type, to reflect errors in consolidation. In addition, the SA must decrease the site's total meal count to reflect the

number of non-reimbursable meals claimed for reimbursement, e.g., meals that do not meet meal pattern requirements, meals served to adults or ineligible children, or second meals.

Note: SFAs may not claim second meals in the NSLP; however, the SFA may claim second meals in the SBP as long as the SFA does not plan and produce meals with the intention of claiming second meals. (7 CFR 220.9)

Consolidation Errors— The SA must determine whether any consolidation errors occurred at the reviewed school. Refer to Section II: *Meal Access and Reimbursement*, Module: *Meal Counting and Claiming,* for more information. The SA must adjust the number of meals, by type, claimed by the site to reflect the correct count of meals. This may result in increases or decreases to the meal counts, by type. The SA must record the result of this calculation on the *Fiscal Action Workbook*, Blocks 5A and 5B. (See S-1, line 13 for day of review and S-1, line 17 for review period)

For Example:
For NSLP, the site claimed 13,050 meals (claimed 7,050 free; 4,000 reduced price; and 2,000 paid) during the closed Claim for Reimbursement. The SA determined that a consolidation error occurred resulting in an error of 50 meals being overclaimed as free meals. Therefore, 50 meals must be subtracted from the sites' total free claim of 7,050. 7,050 total free meals claimed - 50 free meals identified by the SA as a consolidation error 7,000 SA count of total free meals

(a) Non-Reimbursable Meals— The SA must subtract the number of non-reimbursable meals (e.g., meals not meeting the meal pattern requirements, meals served to adults or ineligible children, and second meals claimed) from the total number of meals claimed by the site after consolidation errors are corrected. The result of this calculation must be recorded on the *Fiscal Action Workbook*, Block 7. (See S-1, lines 10, 11, 12 and 14 for day of review and S-1, lines 14, 15 and 16 for review period)

For Example:

The total number of meals is 13,000 meals (7,000 free; 4,000 reduced price; and 2,000 paid) during the closed Claim for Reimbursement. The SA determined that 1,000 meals were not reimbursable (e.g., meals not meeting the meal pattern requirements, meals served to adults or ineligible children, and second meals claimed).

Therefore, 1,000 non-reimbursable meals subtracted from 13,000 total meals results in the SA determining that 12,000 is the correct number of total reimbursable meals.

13,000 total meals claimed
- 1,000 non-reimbursable meals
12,000 SA count of total reimbursable meals

Step 5: Determine the number of reimbursable meals by benefit type

The purpose of Step 5 is to determine how many of the SA's corrected total number of reimbursable meals (Step 4) are free, reduced price, and paid, respectively. The *Non-reimbursable Meal Allocation Form* can be used in this calculation, if needed.

(a) Reimbursable Free Meals — To determine the total number of reimbursable free meals, divide the number of free meals claimed by the total number of meals claimed. Multiply the result by the SA count of the total number of reimbursable meals from Step 4. The result of determining the SA count of reimbursable free meals is calculated automatically by the *Fiscal Action Workbook*, Block 8.

$$\frac{\text{Free meals claimed}}{\text{Total number of meals claimed}} \times \text{SA count of total number of reimbursable meals} = \text{SA count of reimbursable free meals}$$

For Example:

(7,000 free meals claimed /13,000 total meals claimed) x 12,000 SA count of total reimbursable meals = 6,462 SA count of reimbursable free meals

This means of the 12,000 reimbursable meals, 6,462 should be considered free meals.

(b) Reimbursable Reduced Price Meals — To determine the number of reimbursable reduced price meals, divide the number of reduced price meals claimed by the total number of meals claimed. Multiply the result by the SA count of the total number of reimbursable meals from Step 4. The result of determining the SA count of reimbursable reduced price meals is calculated automatically by the *Fiscal Action Workbook*, Block 8.

$$\frac{\text{Reduced price meals claimed}}{\text{Total number of meals claimed}} \times \text{SA count of total number of reimbursable meals} = \text{SA count of reimbursable reduced price meals}$$

For Example:

(4,000 reduced price meals claimed /13,000 total meals claimed) x 12,000 SA count of total reimbursable meals = 3,693 SA count of reimbursable reduced price meals

This means of the 12,000 reimbursable meals, 3,693 should be considered reduced price meals.

Step 6: Establish the SA reimbursable meal count, by category

The purpose of Step 6 is to determine the meal count for free, reduced price, and paid meals, respectively, based on the certification and benefit issuance adjustment factor (Step 1).

The SA must apply the certification and benefit issuance adjustment factor for free and reduced price meals, respectively (Step 1), to the SA count for the number of reimbursable free and reduced price meals, respectively (Step 2), to adjust the reimbursable meals for each benefit category for the review period. The count for the number of paid meals is derived by subtracting these two calculations from the total SA count of reimbursable meals (Steps 1 and 2).

Note: The certification and benefit issuance adjustment factor is required to be applied to all reviewed sites. When calculating fiscal action for non-reviewed sites and the application of the adjustment factor is not appropriate, select the "non-reviewed" option on the *Fiscal Action Workbook*, Block 9A except in cases where the certification and benefit issuance review results in an error threshold in excess of 3%. When the 3% error threshold is exceeded, fiscal action must be applied to all sites within the SFA.

(a) Free Meal Count — Multiply the certification and benefit issuance adjustment factor for free meals, *Fiscal Action Workbook*, Block 9B,) by the number of reimbursable meals as determined by the SA for the free category, *Fiscal Action Workbook*, Block 8 The product of this calculation is the maximum number of free meals allowed to be claimed.

The maximum number of free meals the SFA may claim is automatically calculated by the *Fiscal Action Workbook*, Block 10.

Certification and benefit issuance adjustment factor for free meals
x SA's count of reimbursable free meals
= Maximum number of meals to be claimed free

For Example:

0.840 certification and benefit issuance adjustment factor for free meals
x 6,462 SA' s count for reimbursable free meals
5,429 meals to be claimed free

(b) Reduced Price Meal Count — Multiply the certification and benefit issuance adjustment factor for reduced price meals, *Fiscal Action Workbook*, Block 9C, by the number of reimbursable meals as determined by the SA for the reduced-price category, *Fiscal Action Workbook*, Block 8. The product of this calculation is the maximum number of reduced-price meals allowed to be claimed.

The maximum number of reduced-price meals the site may claim is automatically calculated by the *Fiscal Action Workbook*, Block 10.

Certification and benefit issuance adjustment factor for reduced-price meals
x SA's count of reimbursable reduced-price meals
= Maximum number of meals to be claimed reduced-price

For Example:

0.882 certification and benefit issuance adjustment factor for reduced-price meals
x 3,692 SA' s count for reimbursable reduced-price meals
3,259 meals to be claimed reduced-price

(c) Paid Meal Count — Subtract the maximum number of free meals and the reduced-price meals from the SA count of reimbursable meals. The difference is the maximum number of paid meals allowed to be claimed.

The maximum number of paid meals the site may claim is automatically calculated by the *Fiscal Action Workbook*, Block 10.

SA count of the total number of reimbursable meals
– SA count of the number of reimbursable free meals
– SA count for the number of reduced-price meals
= Maximum number of paid meals the site may claim

For Example:

12,000 SA count of total number of reimbursable meals
– 5,429 meals to be claimed free
– 3,259 meals to be claimed reduced-price
3,312 meals to be claimed paid

Step 7: Establish fiscal action

The purpose of Step 7 is to determine the amount of fiscal action to assess due to consolidation errors, non-reimbursable meals, and certification and benefit issuance errors.

The SA must determine the school's claim with the SA's corrections in order to determine the amount of fiscal action it assesses. The SA must use the reimbursement rate the site receives and enter it on the *Fiscal Action Workbook*, Block 11 for this calculation. Therefore, if the site receives the Severe Need Breakfast rate, NSLP's high reimbursement rate, and/or the additional six cents for meeting the dietary specifications, the SA must use the total amount of reimbursement per meal in these calculations.

(a) School claim — Multiply the site's count of the number of free, reduced-price, and paid meals claimed for the review period (Block 4) by the respective rate of reimbursement. The product is the amount of reimbursement claimed, by category, for the site for the review period. This amount is automatically calculated by the *Fiscal Action Workbook,* Block 12.

For Example:

For NSLP, the site received the NSLP's high rate with the 6-cent additional reimbursement for school year 2012-2013; therefore, the site's reimbursement rates for SYSY 2012-2013 were: Free = $2.94; Reduced-Price = $2.54; Paid = $0.35

Free:
7,050 free meals claimed
x $2.94 free reimbursement rate
$20,727 Total reimbursement for free meals

Reduced-Price:
4,000 reduced-price meals claimed
x $2.54 reduced-price reimbursement rate
$10,160 Total reimbursement for reduced-price meals

Paid:
2,000 paid meals claimed
x $0.35 paid reimbursement rate
$700 Total reimbursement for paid meals

(b) SA corrected claim — Multiply the SA count of the maximum number of free meals, reduced-price meals, and paid meals the site may claim, *Fiscal Action Workbook*, Block 10, by the respective rate of reimbursement. The product is the correct amount of reimbursement, by category, earned by the site for the review period.

This amount is automatically calculated by the *Fiscal Action Workbook*, Block 13.

For Example:

Free:
5,429 free meals validated by SA
X $2.94 free reimbursement rate
$15,961.26 Corrected reimbursement for free meals

Reduced-Price:
3,259 reduced-price meals validated by SA
X $2.54 reduced-price reimbursement rate
$8,277.86 Corrected reimbursement for reduced-price meals

Paid:
3,312 paid meals validated by SA
X $0.35 paid reimbursement rate
$1,159.20 Corrected reimbursement for paid meals

(c) Fiscal action — Subtract the SA corrected amount of reimbursement, *Fiscal Action Workbook*, Block 13,from the school Claim for Reimbursement, *Fiscal Action Workbook*, Block 12, . The difference is the total amount of fiscal action. This amount is automatically calculated by the *Fiscal Action Workbook*, Block 14.

For Example:

Free:
$15,961.26 SA corrected reimbursement for free meals
- $20,727 Sites(s) claimed reimbursement for free meals
($4,765.74) difference for free meal reimbursement (SFA Overclaim)

Reduced-Price:
$8,277.86 SA corrected reimbursement for reduced-price meals
- $10,160.00 Site(s) reimbursement for reduced-price meal
($1,882.14) difference for reduced-price meal reimbursement (SFA Overclaim)

Paid:
$1,159.20 SA corrected reimbursement for paid meals
- $ 700.00 Site(s) claimed reimbursement for paid meals
$459.20 difference for paid meal reimbursement (SFA Underclaim)

Step 8: Calculate Fiscal Action for Other Federal Program Errors

The purpose of Step 8 is to determine and apply the amount of fiscal action to apply for errors in the FFVP and the NSLP Afterschool Snack Service ****This step is only applicable to the NSLP Standard Tab as FFVP and the NSLP Afterschool Snack Service are not calculated with the SBP Standard Tab.**

a) FFVP – The SA must calculate the amount of fiscal action to apply by summing the total amount of underclaim/overclaims and/or any unallowable program costs from the SFAs FFVP claim for reimbursement. (See the S-1, line 21 for day of review and review period) Enter this amount on the *Fiscal Action Workbook*, Block 15.

b) NSLP Afterschool Snack Program– The SA must calculate the amount of fiscal action to apply by adding or subtracting any differences in the SFAs meal counts by type from the SA validated meal counts by type. (See the S-1, line 23 for the day of review and the review period) Enter the meal count differences by type on the *Fiscal Action Workbook*, Block 16A. The reimbursement rates claimed for the NSLP Afterschool Snack Service by the site must then be entered into Block 16B.

Step 9: Total Fiscal Action

The total amount of fiscal action for each individual site is automatically calculated listed on *Fiscal Action Workbook*, Block 17. The total amount of fiscal action, combined for every site, is automatically calculated and listed in *Fiscal Action Workbook,* Block 3.

Calculating Fiscal Action: Other Fiscal Action Workbook Tabs

There are several additional tabs contained within the *Fiscal Action Workbook*. Each will be used only for a specific situation based on the program being reviewed and whether recalculation is required.

- *NSLP Standard SSO and SBP Standard SSO (Standard Seamless Summer)* - is intended for sites operating NSLP and/or SBP under the SSO.SSO When completing this tab, follow the same steps outlined in the **NSLP Standard and SBP Standard Tab** sections.

  Note: When the using the *NSLP Standard SSO and SBP Standard SSO* tab for sites that claim all students free, select the Non-reviewed Site option in block 9A in the workbook.

- *NSLP Standard RECAL and SBP Standard RECAL (Standard Recalculation)* - is intended for sites operating NSLP and/or SBP in standard situations, to include base year Provision 2 or 3 sites, which require full recalculation. These tabs are similar in process to that of the **NSLP and SBP Standard Tabs**, however, there are additional steps added in order to complete the full recalculation process. The additional steps required are:

  a. Block 5: Number of Meals Claimed by the SFA at the Reviewed Site for the 30-Consecutive-Operating-Day Recalculation Period – Record meal count totals by category from the 30 day recalculation period. S-1, Line 24C and/or 25C.
  b. Block 8: Month Being Recalculated – Must select the month requiring full recalculation. S-1, Line 24A and/or 25A.
  c. Block 9: Nominalization Factor (See Recalculation) – This field automatically calculates and displays the nominalization factor based on the month entered in Step 8.

d. Block 10: Operating Days – Must entering the number of operating days in the month requiring recalculation, S-1, Line 24B and/or 25B.
e. Block 11: Normalized and Recalculated Meal Counts – This field automatically calculates and displays the total number of allowable meals by category which have been adjusted based on the nominalization factor and number of operating days.

- *NSLP P2/CEP and SBP P2/CEP (Provision 2 Non-Base Year and Community Eligibility Provision)* – is intended for sites operating NSLP and/or SBP under Provision 2 in non-base years and sites operating the Community Eligibility Provision. These tabs are similar to that of the **NSLP and SBP Standard Tabs**; however, there are slight variations to the data and steps needed to calculate fiscal action in these types of sites. The differences are:
  a. Block 2: For these tabs you will enter the ***total*** number meals claimed by the reviewed site, aggregate total and not by category.
  b. Blocks 6A and 6B: Instead of entering and applying the Certification and Benefit Issuance Adjustment Factor, as these are sites in non-base years or operating the CEP, the SFA claiming percentages and SA validated claiming percentages are recorded.

- *NSLP P2/CEP RECAL and SBP P2/CEP RECAL (P 2 Non-Base Year and CEP Recalculation)* - is intended for sites operating NSLP and/or SBP under Provision 2 in non-base years and sites operating the Community Eligibility Provision which require full recalculation. These tabs are similar in process to that of the **NSLP P2/CEP and SBP P2/CEP Tabs**, however, there are additional steps added in order to complete the full recalculation process. The additional steps required are:

  a. Block 2: Meal Count for 30-Day Recalculation Period – Record meal count **totals** from the 30 day recalculation period. S-1, Line 24C and/or 25C.

b. Block 5: Month Being Recalculated – Must select the month requiring full recalculation. S-1, Line 24A and/or 25A.
c. Block 6: Nominalization Factor (See Recalculation) – This field automatically calculates and displays the nominalization factor based on the month entered in Step 8.
d. Block 7: Operating Days – Must entering the number of operating days in the month requiring recalculation, S-1, Line 24B and/or 25B.
e. Block 8: Normalized and Recalculated Meal Counts – This field automatically calculates and displays the ***total*** number of allowable meals which have been adjusted based on the nominalization factor and number of operating days.

- *NSLP P3 and SBP P3* (Provision 3 Non-Base Year) – is intended for sites operating NSLP and/or SBP under Provision 3 in non-base years. These tabs are similar to that of the **NSLP and SBP Standard Tabs**; however, there are slight variations to the data and steps needed to calculate fiscal action in these types of sites. The differences are:
    a. Block 2: Start by entering the total amount of funds claimed by the site, since Provision 3 sites operate on a set funding level to be claimed each month (calculated from base year data).
    b. For the tracking of fiscal action by meal category type, Block 4 contains the number of meals by category claimed at the site. This number can be compared to the maximum number of reimbursable meals (adjusted for errors) that is automatically calculated and recorded in Block 6. Any difference in these meal counts can be used for accessing fiscal action.

- *SMP (Special Milk Program)* – is intended for sites operating the Special Milk Program. Steps needed to complete this tab are:

    a. Block 2: Enter the milk reimbursement rate.

b. Block 3: Enter the total number of non-reimbursable milks. S-1, Line 23.

c. Block 4: Total fiscal action is automatically calculated and recorded.

- *Fiscal Action Summary* – is the final tab which shows the total cumulative amount of fiscal action for all sites by program area. This tab is automatically calculated using the data imputed from all other tabs contained within the *Fiscal Action Workbook.*

Module: Withholding Payments

Intent/Scope

The SA must withhold program payments in the following situations:

- The SFA fails to submit documented corrective action by the established due date, including approved extensions, for a Performance Standard 1 or Performance Standard 2 error
- The SFA submits documented corrective action by the established due date; however, the SA finds that corrective action for a Critical Area in fact was not completed

The SA may withhold program payments in the following situation:

- The SA finds a Critical Area error at the SFA on a previous review, and the SFA continues to have the same error for a same cause

When the SA determines that it is not in the best interest of the program to withhold 100 percent of program payments, it may withhold a minimum of 40 percent. Factors that the SAs may consider when determining the amount to withhold include:

- The ability of the SFA to continue to provide meals to students during the time it takes to complete corrective action
- The willingness of the SFA to complete corrective action on a timely basis. For example, the SA may give additional consideration when circumstances beyond the SFA's control cause a delay in required corrective action beyond the established due dates and approved extensions. (7 CFR 210.18(l)(3))

FNS Approval

The SA may withhold less than 40 percent of program payments when FNSRO determines that

it is in the best interest of the program (7 CFR 210.18(l)(3)). The SA must submit a written request to FNSRO that includes the following information:

- The name of the SFA
- The date(s) of the Administrative Review and any follow-up reviews, if applicable
- A description of the Critical Area violation(s) identified during the Administrative Review, required corrective action, and the SFA response
- Results of any follow-up review(s)
- The withholding percentage requested
- The SA's rationale for withholding less than 40 percent of program payments, including the adverse effect that a higher withholding amount would have on the SFA

Failure to Withhold

FNSRO may suspend the program or withhold program payments and State Administrative Expense funds, in whole or in part, for those SAs failing to withhold program payments as required in 7 CFR 210.18(l)(4).

Discretionary Withholding

The SA may withhold payments for General Areas of Review violations. For example, discretionary withholding of payments may be appropriate if:

- The SFA does not complete and submit corrective action within established timeframes
- The SFA does not take corrective action as specified in the documented corrective action.

In the absence of the SFA submitting documentation required to complete the Administrative Review, program compliance cannot be satisfactory verified by the SA, therefore withholding of program payments would be appropriate. (7 CFR 210.24)

FNSRO approval for discretionary withholding of payments is not required. (7 CFR 21018(l)(iv))

SFA Notification

The SA must provide the SFA with the right to appeal any decision to withhold payments. The contents of the notification must parallel the information in the module, *Letter of Claim Adjustment and/or Withholding of Payment Including Notice of Appeal* located later in this section. (7 CFR 210.18(q))

Effective Date

Withholding of program payments must begin immediately upon notification to the SFA. The SA must withhold payments for any original or upward adjusted claim, regardless of the date submitted to the SA. The SA may process downward adjustments to previously paid claims during the withholding period.

Duration

The SA must promptly release withheld program payments in the proper amount when the following is complete:

- The SFA completes all required corrective action
- The SA receives documentation of corrective action
- The SA completes any required follow-up review
- The SA determines the corrective action was successful (7 CFR 210.18(l)(2))

Claim Submissions during Withholding

Since the SFA continues to earn program payments during a period of withholding, the SFA must continue to submit Claims for Reimbursement on a timely basis.

Reporting Requirements

FNS-777 SAs must report withheld payments as an unliquidated obligation on the *Financial Status Report,* FNS-777. The SAs must also identify any portion of unliquidated, obligated funds resulting from withholding of payments in the footnote section of the form.

FNS-10 Include meal count data from withheld claims on the appropriate monthly *Report of School Program Operation*, FNS-10

Module: Overpayment Disregard

Intent/Scope

The SA may disregard an overclaim if the overclaim does not exceed $600 per program, i.e., NSLP (including SSO, FFVP and the NSLP Afterschool Snack Service), SBP, and SMP. The disregard may be made once per Federal fiscal year for any review or activity. However, the SA may not disregard an overclaim where there is substantial evidence of criminal law violations or civil fraud statutes.

The SA must use a written notification of potential or actual disregard when the claim amount is $600 or less. The letter should include:

- Date of review
- Appreciation for response to review findings, if applicable
- Statement of claim amount, how it was determined, and the basis for the claim
- Name and telephone number of SA contact person

There is no $600 disregard for a Claim for Reimbursement that has yet to be submitted. The $600 disregard also does not apply to closed claims for sites in the base year when fiscal action is required to fix the meal counts when a Provision 2 or 3 base year review is being conducted in conjunction with the Administrative Review.

Module: Letter of Claim Adjustment and/or Withholding of Payment Including Notice of Appeal

Intent/Scope

Upon receipt of the SFA's documented corrective actions, the SA must send the SFA a notice letter that details the grounds on which the denial of all or a part of the Claim for Reimbursement or withholding payment is based. This notice must be sent by **certified mail, return receipt requested**. (7 CFR 210.18(j))

Required Content

The required content is as follows:

- Explain in detail why all or a part of the Claim for Reimbursement has been denied and/or payment has been withheld.
- Include a statement indicating that the SFA may appeal through state appeal procedures, if established, or enclose a copy of 7 CFR 210.18(q) of the regulations for appeal procedures. Appeal rights must be provided for any proposed fiscal action for the review period, month in which the on-site review takes place, and all other claim periods.
- Inform the SFA of the entity to which the appeal should be directed.

Suggestions for Additional Content

The suggested additional content is as follows:

- Date of review
- Appreciation for response to review findings
- Statement of claim adjustment amount, including meal count adjustments, how it was determined, and the basis for the claim
- SA recovery procedures
- Name and telephone number of SA contact person

Section IX: Special Provision Options

Modules contained within this Section include:

- Special Provision Options 1, 2, and 3
- Community Eligibility Provision

Module: Special Provision Options 1, 2, and 3

Introduction

To reduce administrative challenges, local educational agencies (LEAs/SFAs) with a high percentage of free and reduced price certifications may elect to use a Special Provision Option (SPO) to streamline administrative requirements. The Administrative Review requirements are modified based on the SPO(s) employed by the LEA. This Module addresses those modifications as they relate to Special Provision Options 1, 2 and 3.

- ***Provision 1 – Reducing certification to once every 2 years:*** Schools may reduce annual notification of program availability and certification of children eligible for free meals to once every 2 consecutive school years. Schools continue to take daily meal counts of the number of meals served to children by type (free, reduced price, paid) as the basis for calculating reimbursement claims. Provision 1 is only available in schools where at least 80 percent of the enrolled children are eligible for free or reduced price meals.
- ***Provision 2 – Reducing certifications to once every 4 years and claiming based on derived percentages***: Participating schools must serve meals to all participating children at no charge for a period of 4 years. During the first year (or base year)) the school makes eligibility determinations and takes meal counts by type (free, reduced price, paid). 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 4 years. Additional 4-year extensions to Provision 2 are possible when certain conditions are met. Schools electing Provision 2 must pay, with funds from non-Federal sources, any difference between Federal reimbursement and the cost of serving lunches/breakfasts at no charge to all participating students.

Provision 3 – Reducing certifications to once every 4 years and claiming based on prior funding levels: Participating schools must serve meals to all participating children at no charge for a period of 4 years. Provision 3 schools make eligibility determinations in the year preceding Provision 3 implementation (i.e., the year before the 4 year cycle starts); this is the base year. Schools receive the level of Federal cash and commodity support paid to them in the base year. Schools do not make additional eligibility determinations during the 4 year cycle. For each of the 4 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 4 years. Additional 4-year extensions to Provision 3 are possible when certain conditions are met. Schools electing this Provision must pay, with funds from non-Federal sources, the difference between Federal reimbursement and the cost of serving lunches/breakfasts at no charge to all participating students.

Intent/Scope of Monitoring

The requirements of the *Administrative Review Manual* apply to the review of s an LEA's administration of SPOs. While Administrative Review activity typically occurs at the district level, some aspects may also occur at the school or SA level (e.g., if the SA applies the claiming percentages to meal counts).

This Module covers the additional steps required to monitor SFAs implementing Special Provision 1, 2, or 3 at some or all of their sites in both base and non-base years. Some procedures, such as certification and benefit issuance and recordkeeping, may differ depending on whether a school is in a base or non-base year. These differences in Administrative Review procedures are discussed below.

Review Procedures

Site Selection

The SA must use normal site selection procedures for schools in the SFA. Refer to Section I: *Pre-Visit Procedures, Site Selection Procedures.*

For schools operating Provision 1 or for schools in the base year of Provision 2 or 3, no special targeting for site selection is necessary since meal counting and claiming procedures in these schools mirror those of standard meal counting and claiming schools (see Section II: *Meal Access and Reimbursement*).

If the school selection procedures do not result in the review of a Provision 2 or 3 school in a Non-Base year, the SA must conduct an abbreviated review in at least one school per SPO type (i.e., Provision 2 and Provision 3).The scope of an abbreviated review is discussed later in this Module.

There are no additional site selection requirements if all sites within the LEALEA are operating one or more SPOs.

Pre-visit Review Procedures for Provision 1 Schools and Provision 2/3 Base Year Schools Selected for Review

- **Follow the Administrative Review Manual** – The SA must use the *Off-site Assessment Tool*, including Section IX, *Special Provision Options*, to obtain the procedures the SFA uses in administering the SPO.

- **Conduct the Certification and Benefit Issuance Review –** The review may be conducted off-site or on-site. For more information, refer to *On-site Review Activities for Base Year and Non-Base Year Schools Selected for Review, Step 2* below.

Pre-visit Review Procedures for Provision 2 and 3 Non-Base Year Schools Selected for Review

- **Use the Off-site Assessment Tool**

For Non-Base Year SPOs, the SA must use the *Off-site Assessment Tool*, including Section IX, *Special Provision Options*, to obtain the procedures the SFA used to determine their claiming percentages and/or funding levels during the base year. The SA must also obtain information on the procedures used by the SFA to apply the claiming percentages to non-base year's monthly Claim for Reimbursements.

NOTE: For Provision 2 and 3 sites, the SA must ensure that the LEA established claiming percentages and/or funding levels separately for SBP and NSLP.

- **Conduct the Certification and Benefit Issuance Review Process –** Students attending sites in a non-base year must be excluded from the certification and benefit issuance review. For more information, refer to *On-site Review Activities for Base Year and Non-Base Year Schools Selected for Review, Step 2* below.

On-site Review Activities for SPO Sites Selected for Review

Step 1: Confirm Off-site Assessment Tool

The SA must verify the SFA information received from the *Off-site Assessment Tool*, including *Section IX, Special Provision Options*. The reviewer must ensure that the procedures described in the *Off-site Assessment Tool* match what is occurring on-site.

Step 2: Conduct the Certification and Benefit Issuance Review

The SA must proceed with the certification and benefit issuance review following procedures set forth in the *Administrative Review Manual*, and the adjustments described below:

- **For Provision 1 schools, Provision 2 and 3 schools establishing a Base Year, and for schools using Provision 2 or 3 in the SBP only**, the SA must follow the procedures described in Section II: *Meal Access and Reimbursement* to evaluate certification and benefit issuance and apply and fiscal action. All free and reduced price eligible students in the SFA are included in the statistically valid sample or 100% certification and benefit issuance review, including students in a Provision 1 school or a Provision 2 or 3 base year school. Note: Verification is assessed during the certification and benefit issuance review and during the general area review of eligibility and verification procedures. Refer to *Step 5* below.

  Note: For Provision 1 schools operating in the second year, the SA must ensure the correct Income Eligibility Guidelines are used when reviewing certification and benefit issuance for those students in their second year of free certification.

- **For Provision 2 and 3 schools operating in a Non-Base Year**, the SA must exclude students enrolled at these schools from the certification and benefit issuance review. There are no additional certification procedures to review. The review of the SFA/school's claiming percentages are addressed in *Step 3* below. Note: SAs are not required to assess verification for Provision 2 or 3 schools operating in non-base years.

When performing a base year review in conjunction with the Administrative Review, the following table describes how to determine samples to complete reviews. For additional information on conducting Provision 2 Base Year Reviews, please see SP 46-2015, *Review of Special Provision Options 2 and 3 Base Year*.

	District-wide?	# of Samples	Sample Make-Up	F.A. Process
Prov 2 & 3 SBP & NSLP	**Yes**	**1**	**All students enrolled (Free/Reduced/Denied Certifications)**	**Base Year Adj Calculation**
Prov 2 & 3 SBP & NSLP	**No**	**2**	**B.Y. Sample: All students enrolled in the schools operating SPO 2 or 3 (Free/Reduced/Denied Certifications)** **AR Sample: All students enrolled in schools operating the SBP & NSLP except for those enrolled at sites operating SPO 2 (i.e. sample 1) (Free/Reduced Certifications)** *****Student names should not appear on both samples***	**B.Y. Sample: Base Year Adj. Calculation** **AR Sample: Fiscal Action Workbook**
Prov 2 & 3 SBP Only	**Yes**	**2**	**B.Y. Sample: All students enrolled in the schools operating SPO 2 or 3 for SBP (Free/Reduced/Denied Certifications)** **AR Sample: All students enrolled in schools operating the SBP & NSLP (Free/Reduced Certifications)** *****Student names from the B.Y. Sample may be included in the AR Sample***	**B.Y. Sample: Base Year Adj. Calculation** **AR Sample: Fiscal Action Workbook**
Prov 2 & 3 SBP Only	**No**	**2**	**B.Y. Sample: All students enrolled in the schools operating SPO 2 or 3 for SBP (Free/Reduced/Denied Certifications)** **AR Sample: All students enrolled in schools operating the SBP & NSLP (Free/Reduced Certifications)** *****Student names from the B.Y. Sample may be included in the AR Sample***	**B.Y. Sample: Base Year Adj. Calculation** **AR Sample: Fiscal Action Workbook**

Step 3: Validation of Claiming Percentages and/or Funding Levels

- **If a Provision 2 or 3 school under review is in the Base Year,** the SA does not validate claiming percentages or funding levels, as those levels are established during the base years and applied in non-base years. However, as mentioned above in *Pre-Visit Review Procedures,* the SA must complete the Off-site Assessment Tool and determine whether SPO schools have acceptable processes to establish accurate claiming percentages and funding levels.

  NOTE: If systemic errors identified during the on-site review required full recalculation, the SA must require the SPO site(s)/SFA to conduct another base year in a subsequent school year.

- **If a Provision 2 or 3 school under review is in the Non-Base Year**, at a minimum, the SA must verify that the base year claiming percentages/funding levels were properly applied to Claims for Reimbursement from the review period and month of the on-site review.

  NOTE: If claiming percentages and/or funding levels were applied erroneously , SAs must require(as part of a Corrective Action Plan) that the SFA provide documentation for every closed Claim for Reimbursement from the current school year showing that the claiming percentages and/or funding levels were applied correctly at every non-base year site (reviewed and non-reviewed) in the SFA.

  The SA has the discretion to expand the scope of review to prior school years. This applies to any non-base year school selected for review under the Administrative

Review site selection procedures or selected as one of the additional sites for the abbreviated review (described above under *Site Selection)*.

Step 4: Recordkeeping

The SFA/school must retain records for all SPO schools, as follows:

- **Records for Provision 1** must be retained for three years after submission of the final Claim for Reimbursement for the fiscal year to which they pertain. If audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of issues raised by the audit.

- **Base Year records for Provisions 2 or 3,** which support subsequent years' reimbursements, must be retained during the entire period the SPO is in effect, including all extensions. Recordkeeping is essential because claims for the base year and all subsequent years are based on base year data. In addition, records documenting verification activities from the base year must be retained during the entire period the SPO is in effect, including all extensions.

  Additionally, such records must be retained for three years after submission of the final Claim for Reimbursement for the last fiscal year that used the base year data. If audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of issues raised by the audit.

- **Non-Base Year records for Provisions 2 or 3** must be retained for three years after submission of the final Claim for Reimbursement for the fiscal year to which they

pertain. If audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of issues raised by the audit.

If a SA determines that the SFA/school has not maintained the required records for a participating site, the SA may require the school to return to standard application and meal counting procedures.

Step 5: All Other Critical and General Areas of Review

When evaluating the SFA for compliance with both critical and general areas of review as part of the Administrative Review, the SA must review all required areas and complete all required forms as specified by the *Administrative Review Manual*.

Step 6: Recording Review Findings

The SA must ensure the following forms are completed as applicable:

- Administrative Review **Off-site Assessment Tool** – Questions #2100 - 2111
- Administrative Review **On-site Assessment Tool** – Questions #2112 - 2116
- Administrative Review School Data and Meal Pattern Error and Other Meal Claim Errors Forms (**S-1, S-2**) – Used to record **all** Special Provision Option (SPO) site data.
- Eligibility Certification and Benefit Issuance Error and Other Eligibility Certification and Benefit Issuance Errors Worksheets (**SFA 1, SFA-2**) – Used to record all **Base Year** Special Provision Option (SPO) site Certification and Benefit Issuance errors.
- Special Provisions Non-Base Year and CEP Claiming Percentage/Funding Level Summary Form (**SFA-1A**) – Used to record all Special Provision Option site (or group of sites) SFA- and SA-validated claiming percentages/funding levels.
- *Fiscal Action Workbook* – Used to complete fiscal action process for all SPO **Base and Non-Base Year** sites, including those requiring Full Recalculation.

Abbreviated Review

As mentioned above, under *Review Procedures, Site Selection*, if the school selection procedures do not result in the review of a SPO in a non-base year, the SA must select at least one site per SPO type (i.e. Provision 2 or Provision 3) and conduct an abbreviated review to ensure claiming percentages and/or funding levels are correctly applied for the review period.

- **For Provisions 2 or 3** – Only the meal counting and claiming system is reviewed to verify that the claiming percentages and/or funding levels determined from the base year area applied correctly to the current school year's monthly Claims for Reimbursement. The SA may limit this evaluation to the Claim for Reimbursement for the review period.

  If the abbreviated review identifies that the claiming percentages/funding levels are erroneously applied, the SFA is required as part of its Corrective Action Plan to correct the deficiencies identified at the non-compliant site(s). The SFA must also submit documentation for every non-base year SPO site showing that the claiming percentages/funding levels calculated during the base year are applied correctly in the non-base year for every closed Claim for Reimbursement from the school year in which the review occurs.

When issues of severe non-compliance are identified during the abbreviated review, FNS strongly encourages the SA to conduct a full on-site Administrative Review of the non-compliant sites.

NOTE: The abbreviated review can be conducted as part of the off-site review at the SA's discretion.

Technical Assistance/Corrective Action

Technical assistance must be provided and corrective action required as specified in the *Administrative Review Manual* and as described in this section.

Corrective action must be applied SFA-wide for all violations, including benefit issuance and certification errors, at reviewed and non-reviewed sites, if applicable. If systemic errors identified during the on-site review of a base year school(s) required full recalculation, the SA must require the SPO school/SFA to conduct another base year in a subsequent school year.

The SA, in consultation with FNSRO, must give the SFA an adequate timeframe to complete the certification and benefit issuance process. Generally, FNS expects corrective action to occur as soon as practicable in the current school year. However, if it has been determined in the best interest of program management for the SFA not to complete the standard certification process for the current school year, the SA must ensure that the SFA implements all required corrective action and uses the SA-validated claiming percentages and/or funding levels for submitting Claims for Reimbursement for the remainder of the current school year.

If violations to the application of the claiming percentages for Provision 2 non-base year are identified in reviewed schools or through the abbreviated review, the SFA will be required, as part of its Corrective Action Plan, to:

- correct the deficiencies identified at the reviewed sites; and

- submit documentation for every SPO site (including all non-reviewed SPO sites) showing that the claiming percentages calculated and approved during the base year approval are applied correctly for every closed Claim for Reimbursement from the school year in which the review occurs.

When meal counting and claiming procedures yield erroneous total meal counts or meal counts by category, the SA must require Full or Partial Recalculation as applicable to the degree of violation identified.

For all other review area errors, the SA should ensure corrective action is implemented, as applicable, for the type of error identified.

The SA must ensure the SFA understands the importance of operating all aspects of the SPO in compliance with FNS requirements while providing the SFA with detailed Corrective Action Plans that will ensure that the SFA is in compliance with all program requirements. The SA should also encourage the SFA to participate in any SPO training opportunities that may be available.

Fiscal Action

The SA must assess fiscal action as specified in each section of the *Administrative Review Manual.* The SA must also observe the following:

1. *Certification and Benefit Issuance*

For Provision 2 and 3 Schools in the Base Year:

If certification errors are identified, the SA must follow the Certification and Benefit Issuance Module and use the Base Year Adjustment Calculation. This calculation must be applied to all closed Claims for Reimbursement for all sites establishing a base year for Provisions 2/3. By adjusting meal counts during the base year, the resulting claiming percentages and funding levels used in subsequent non-base years will be based on the adjusted and corrected meal counts established during the base year. The base year review can be conducted in conjunction with the Administrative Review. This review corrects previous SFA/site meal counts and the $600 disregard does not apply to closed claims for sites in the base year when fiscal action is required to fix the meal counts.

When errors are identified at reviewed sites, fiscal action must be assessed at non-reviewed Provision 2 and 3 base year sites to adjust meal counts and ensure that claiming percentages and/or funding levels used are calculated correctly.

Note: The SA will follow the procedures detailed in the "*Special Provision Option Base Year Review*" memo for situations in which the SFA has sites that established base years prior to SYSY 2013--14.

For Provision 2 and 3 Schools in a Non-Base Year:

- Certification errors identified during the Administrative Review area not applied to Provision 2 or 3 schools in a non-base year, for the calculation of fiscal action.
- Complete the *Fiscal Action Workbook*, NSLP and SBP Standard tabs for standard claiming sites selected for review for NSLP and SBP (if applicable).
- Complete the *Fiscal Action Workbook*, NSLP and SBP P2/CEP and/or NSLP and SBP P3 tabs for Provision 2 or 3 schools in a non-base year selected for review.

For Schools Operating Provision 2 or 3 <u>for SBP Only</u> (Standard Counting and Claiming for NSLP):

If certification errors are found, the reviewer will complete the fiscal action process as follows:

Standard Claiming for NSLP and Provision Schools in <u>Base Year</u> SBP:

Complete the *Fiscal Action Workbook*, NSLP and SBP Standard tabs for all standard NSLP/SBP claiming sites and Provision school base year sites review. Apply any resulting adjustment factor from the certification and benefit issuance review.

Standard Claiming for NSLP and Provision 2 or 3 in <u>Non-Base Year</u> SBP:

- Complete the *Fiscal Action Workbook*, NSLP Standard tab for all standard claiming sites.
- Complete the *Fiscal Action Workbook*, SBP P2 and CEP, and/or SBP P3 tabs for all Provision non-base year SBP-only sites selected for review.

2. Recordkeeping

When Provision 1 records, Provision 2 or 3 base year and/or non-base year records are not retained as required, the SA **may**, at its discretion, disallow some or all meals served at each site/SFA that failed to **maintain all required documentation and** the SA may require the school to return to standard application and meal counting procedures**.**

Module: Community Eligibility Provision

Introduction

To reduce administrative challenges, LEAs with a high percentage of free and reduced price certifications may elect to use a Special Provision Option (SPO). Determining compliance with the requirements associated with each option requires some modification of the Administrative Review requirements. This Module addresses those modifications as they relate to the Community Eligibility Provision (CEP):

- ***Community Eligibility Provision (CEP) – Eliminating household applications in low-income LEAs, groups of schools, and individual schools and claiming based on derived percentages:*** To elect CEP, schools must agree to serve lunch and breakfast at no charge to all enrolled students and must agree to cover with non-Federal funds any operating costs that exceed the Federal reimbursement. The reimbursement is based on claiming percentages derived from the percentage of identified students multiplied by a factor of 1.6. The term "identified student percentage" (ISP) refers to the percentage of enrolled students who are categorically eligible for free meals based on participation in another, specific assistance program. The claiming percentages established in the year preceding CEP participation are guaranteed for four school years and may be updated if the ISP increases. CEP is only available to LEAs, groups of schools, and individual schools with an ISP that is greater than or equal to 40 percent as of April 1 of the school year prior to participating in CEP.

NOTE: Refer to FNS Memo SP 5454-2016, *Community Eligibility Provision: Guidance and Updated Q&As* on the FNS PartnerWeb for additional information on CEP.

Intent/Scope of Monitoring

The requirements of the *Administrative Review Manual* apply to the review of an LEA's administration of CEP. While Administrative Review activity typically occurs at the SFA or district level, some aspects may also occur at the school or SA level (e.g., if the SA applies the claiming percentages to meal counts).

This Module covers the additional steps required to monitor SFAs implementing CEP at one or more sites.

Review Procedures

Site Selection

The SA must use normal site selection procedures for schools in the SFA. Refer to Section I: *Pre-Visit Procedures, Site Selection Procedures.*

If the school selection procedures do not result in the review of a CEP school, the SA must conduct an abbreviated review in at least one CEP school. The scope of an abbreviated review is discussed later in this Module.

There are no additional site selection requirements if all sites within the SFA are operating CEP.

Pre-visit Review Procedures for CEP Schools Selected for Review

- **Use the Off-site Assessment Tool**

  For CEP schools, the SA must use the *Off-site Assessment Tool*, including Section IX, *Special Provision Options*. The SA must also determine whether any adjustments to the ISP have been made since the most recent ISP was established and whether the updated claiming percentages are correct and are properly applied.

NOTE: For CEP sites, a claiming percentage for the free and paid meals is established and applied to both the SBP and NSLP Claims for Reimbursement equally. However, the SA must ensure that the SBP and NSLP meals are counted separately prior to applying the free and paid claiming percentages to generate monthly Claims for Reimbursement at CEP sites.

- **Certification and Benefit Issuance Review Process**

  When conducting the Certification and Benefit Issuance Review, students attending sites operating CEP must be excluded from the review. For more information, refer to *On-site Review Activities for CEP Schools Selected for Review, Step 2* below.

On-site Review Activities for CEP Sites Selected for Review

Step 1: Confirm Off-site Assessment Tool

The SA must verify the SFA information received from the *Off-site Assessment Tool*, including *Section IX, Special Provision Options*. The reviewer must ensure that the procedures described in the *Off-site Assessment Tool* match the procedures occurring on-site.

Step 2: Conduct the Certification and Benefit Issuance Review

Not all schools in an LEA may be participating in CEP, so the SA must proceed with the certification and benefit issuance review following procedures set forth in the *Administrative Review Manual*, for non-CEP sites and the adjustments described below for non-CEP sites:

- **For LEAs or schools operating CEP**, the SA must exclude students enrolled at CEP schools from the certification and benefit issuance review because household applications are not processed when a site/school is participating in CEP. The review of the LEAs/school's claiming percentages are addressed in *Step 3* below.

  Note: SAs are not required to assess verification for LEAs/schools operating CEP.

- **For CEP schools,** the SA must review the certification documentation used to determine the ISP and claiming percentages that were submitted for the current ISP.

  The certification documentation may include direct certification lists, documentation for extended eligibility, and lists from homeless/migrant liaisons (see SP 5454-2016 for more information on acceptable certification documentation). Documentation required to evaluate the ISP is derived from the April 1st certification documentation from the school year prior to CEP election, which is used to establish the claiming percentages in the current four-year CEP cycle.

  Reviewers must obtain the list of all students used to derive the ISP and randomly* select at least of 10% of student names to verify that those students can be found on source documentation that certifies eligibility for free meal benefits. If more than 10% of the randomly selected sample cannot be properly verified on source documentation, the SFA must be required, as part of their Corrective Action Plan, to provide source documentation for every student used to establish the free claiming percentage.

*As part of the certification documentation review for CEP schools, SAs may randomly select 10% of identified student names at random or a statistically valid sample (see following chart).

Sample Size Chart			
Total # of students in the SFA ISP calculation	SAMPLE SIZE (99%)	Total # of students in the SFA ISP calculation	SAMPLE SIZE (99%)
1-100	All	1251-1500	450
101-250	75%	1501-1750	475
251-500	60%	1751-2000	490
501-750	50%	2001-3000	525
751-1000	380	3001-4000	560
1001-1250	420	4001-5000	580
[redacted]		5000+	590

Note: SAs can randomly select 10% of student names or a statistically valid sample.

Step 3: Validation of Claiming Percentages

When a CEP school is reviewed, the SA must ensure that the correct claiming percentages for free and paid meals were used (complete the SFA-2A).

At a minimum, the SA must verify that the claiming percentages identified for the most recent ISP were properly applied to the review period and month of the on-site review from the current school year. The SA may review certification documents for the ISP and validate the claiming percentages as part of the off-site assessment.

If the review identifies that claiming percentages were erroneously applied, LEA must correct the deficiencies identified at the non-compliant site(s) as part of its Corrective Action Plan. The LEA must also submit documentation for every CEP site showing that the claiming percentages calculated for the current ISP are applied correctly for every closed Claim for Reimbursement from the school year in which the review occurs.

Step 4: Recordkeeping

The LEA/school must retain records for all SPO schools, as follows:

- **For CEP**, LEAs/schools must retain records used to develop the ISP (e.g., records for the initial CEP election year showing numbers of identified and enrolled students, and records from any updates made to the ISP) during the entire period the SPO is in effect, including all extensions. In addition, this documentation and all other documentation must be retained for three years after submission of the final Claim for Reimbursement for the last fiscal year of CEP. If audit findings have not been resolved, these records must be retained beyond the three-year period as long as required for the resolution of issues raised by the audit.

If a SA determines that the LEA/school has not maintained the required records for a participating site, the SA may require the school to return to standard application and meal counting procedures.

Step 5: All Other Critical and General Areas of Review

When evaluating the SFA for compliance with both critical and general areas of review as part of the Administrative Review, the SA must review all required areas and complete all required forms as specified by the *Administrative Review Manual*.

Step 6: Recording Review Findings

The SA must ensure the following forms are completed as applicable:

- Administrative Review **Off-site Assessment Tool** – Questions #2100 - 2111
- Administrative Review **On-site Assessment Tool** – Questions #2112 - 2116

- Administrative Review School Data and Meal Pattern Error and Other Meal Claim Errors Forms (**S-1, S-2**) – Used to record **all** Special Provision Option (SPO) site data.
- Special Provisions Non-Base Year and CEP Claiming Percentage/Funding Level Summary Form (**SFA-1A**) – Used to record all Special Provision Option (SPO) site (or group of sites) SFA- and SA-validated claiming percentages/funding levels.
- Community Eligibility Provision Individual Student Percentage Validation Form (**SFA-2A**) – Used to record ISP information from the validation review of **CEP** sites.
- *Fiscal Action Workbook* – Used to complete fiscal action process for all SPO **Non-Base Year** sites to include CEP sites, including those requiring Full Recalculation.

Abbreviated Review

As mentioned above, under *Review Procedures, Site Selection*, if the school selection procedures do not result in the review of a CEP site, the SA must select at least one CEP site and conduct an abbreviated review. The abbreviated review must include(1) a review the certification documentation used to determine the ISP, and (2) a review of Claims for Reimbursement to ensure that claiming percentages are applied correctly.

The Certification documentation may include direct certification lists, documentation for extension of eligibility, and lists from homeless/migrant liaisons (see SP 5454-2016 for more information on acceptable certification documentation). The documentation required to evaluate the ISP is derived from the April 1st certification documentation from the school year prior to CEP election, which is used to establish the claiming percentages in the current four-year cycle.

Reviewers must obtain the list of all students used to derive the ISP and randomly select at minimum 10% of student names (or a statistically valid sample as discussed in On-site Review Activities for CEP Sites Selected for Review, *Step 1)* to verify that those students can be found on source documentation that certifies eligibility for free meal benefits. If more than 10% of the randomly selected sample cannot be properly verified on source documentation, the SFA

must be required, as part of their Corrective Action Plan, to provide source documentation for every student used to establish the free claiming percentage.

If the review identifies that claiming percentages were erroneously applied, the LEA must correct the deficiencies identified at the non-compliant site(s) as part of its Corrective Action Plan. The LEA must also submit documentation for every CEP site showing that the claiming percentages calculated for the current ISP are applied correctly for every closed Claim for Reimbursement from the school year in which the review occurs.

When issues of severe non-compliance are identified during the abbreviated review, FNS strongly encourages the SA to conduct a full on-site Administrative Review of the non-compliant sites.

NOTE: The abbreviated review can be conducted as part of the off-site review at the SA's discretion.

Technical Assistance/Corrective Action

Technical assistance must be provided and corrective action must be required as specified in the *Administrative Review Manual* and as described in this section.

If violations to the application of the claiming percentages for CEP schools are identified in reviewed schools or through the abbreviated review, the SFA will be required, as part of its Corrective Action Plan, to:

- correct the deficiencies identified at the reviewed sites; and

- submit documentation for every CEP site (including non-reviewed sites) showing that the claiming percentages calculated for the current ISP are applied correctly for every closed Claim for Reimbursement from the school year in which the review occurs.

When meal counting and claiming procedures are identified as yielding erroneous total meal counts or meal counts by category, the SA must require Full or Partial Recalculation as applicable to the degree of violation identified.

If the review of the ISP(s) calculation results in errors that place the CEP participating site(s) below the minimum ISP requirement for CEP eligibility, the participating site(s) must return to standard meal counting and claiming. The LEA must be given adequate time (at least 30 days) to complete the certification process in accordance with7 CFR 245.9(j). If, in the fourth year of the CEP cycle, the ISP is below 40% but at least 30%, the SA has the discretion to allow the LEAs or site to continue operating CEP at the State-identified claiming percentage for a fifth year (a "grace year"). Reimbursement for schools operating in a grace year is based on the ISP as of April 1 in Year 4 of the current four-year cycle. See SP 54-2016 for additional grace year information. To begin new four-year cycle, the LEA must have an ISP of 40% or higher as of April 1st of the fourth year (or grace year, if applicable). However, the LEA would not qualify for the grace year option (as described in SP 54-2016).

For all other errors, the SA should ensure corrective action is implemented, as applicable, for the type of error identified.

The SA must ensure the SFA understands the importance of operating all aspects of the SPO in compliance with FNS requirements while providing the SFA with detailed Corrective Action Plans that will ensure that the SFA is in compliance with all Program requirements. The SA should also encourage the SFA to participate in any SPO training opportunities that may be available.

Fiscal Action

The SA must assess fiscal action as specified in each section of the *Administrative Review Manual.* The SA must also observe the following:

1. Certification and Benefit Issuance

For Schools/LEAs operating CEP:

- Any certification errors identified during the Administrative Review at standard operating sites are not applied to the CEP sites for the calculation of fiscal action.
- Complete the *Fiscal Action Workbook*, NSLP and SBP Standard tabs for standard claiming sites selected for review for NSLP and SBP.
- Complete the *Fiscal Action Workbook*, NSLP and SBP P2/CEP and/or NSLP and SBP P3 tabs for Provision 2/3 schools in a non-base year and/or CEP sites selected for review.

2.Recordkeeping

When ISP records under CEP are not retained as required, the SA **may**, at its discretion, disallow some or all meals served at each site/LEA that failed to **maintain all required documentation and** the SA may require the school to return to standard application and meal counting procedures**.**

Section XI: Resources

The Resource in this Section is:

- Reference Guide: Forms and Tools

Recommended Prior to On-site Review	Required Prior to On-site Review	After completion of Off-site Assessment Tool and prior to On-site Review	On-site Review	Post Review
DATES: These activities should be conducted at least 4-6 weeks prior to the on-site review	These activities **must** be conducted at least 4 weeks prior to the on-site review	Within 4-6 weeks of start of on-site review	While on-site	Within 30 calendar days after on-site review (unless otherwise noted)
Select/identify sites that will receive on-site reviews for NSLP O **Determine the number of sites/ identify sites that will receive:** **SBP review** **FFVP review** **ASP review** **SMP review** A MP RM G O **Complete Off-site Assessment Tool** Use data already on file and request any necessary information from SFA; work collaboratively with SFA to complete • Consider using specialized staff to complete appropriate sections A **Request Benefit Issuance Document from SFA**	RM **Request Resource Management Information for Off-site Assessment Tool** RM **Complete Resource Management section of the Off-site Assessment Tool** This information must be completed by the SA off-site prior to the on-site review or on or offsite review if Resource Management. RM **Complete the Resource Management Risk Indicator Tool** RM **Determine whether a comprehensive RM Review will be conducted in any Resource Management area** If a comprehensive RM review will be conducted, notify SFA of any additional documentation that must be submitted	A MP RM G O **Assess any areas of non-compliance based on off-site assessment** A MP RM G O **Prepare in advance for possible technical assistance needs at SFA** RM **Conduct a comprehensive RM review, if necessary** The SA may conduct the comprehensive review either on-site or off-site, with the exception of allowable costs, which must be reviewed on-site MP **If using the Dietary Specifications Assessment Tool (Option 1) for Targeted Menu review, complete Off-site section of Dietary Specifications Assessment Tool** to determine the initial risk level for the selected site	A MP G O **Complete On-site Assessment Tool** **Record errors on S-1 SFA-2** RM **Conduct a comprehensive RM review, if necessary** The comprehensive review may be conducted off-site instead, with the exception of allowable costs, which must be reviewed on-site MP **If using the Dietary Specifications Assessment Tool (Option 1) for Targeted Menu Review, complete the On-site section of the Dietary Specifications Risk Assessment Tool** to determine the validated risk level. If determined high risk, refer to the Nutrient Analysis and Validation Checklist	**Conduct Exit Conference with SFA** **Record errors on SFA-1** **Issue Administrative Review Summary Report** A MP RM G O **Establish Corrective Action deadline, if necessary** A MP RM G O **Receive, review, respond to documented Corrective Action from SFA** **Use Fiscal Action Workbooks to calculate any needed fiscal action** **Determine whether onsite follow-up is necessary** MP **Complete nutrient analysis/validation process (if required)**

Recommended Prior to On-site Review	Required Prior to On-site Review	After completion of Off-site Assessment Tool and prior to On-site Review	On-site Review	Post Review
A **Select students for Certification/ Benefit Issuance Review** MP **Use Meal Compliance Risk Assessment Tool** to rank selected sites and **determine the site that will receive the Targeted Menu Review** MP **Request Meal Pattern Compliance Documentation from SFA** Allow sufficient time for SA review of Meal Compliance Documentation prior to on-site review. Meal Pattern Compliance documentation includes menus, production records, USDA Foods Information Sheets and other related materials (e.g., CN labels, standardized recipes) that show meals meet requirements. MP **Assess Compliance with Meal Pattern Requirements** Review meals and snacks at each site selected for review to assess compliance with		MP **If validating a SFA-conducted nutrient analysis (Option 2) for Targeted Menu Review, gather any additional documentation necessary and begin validation procedures.** MP **If conducting a nutrient analysis (Option 3), gather any additional documentation necessary and begin data entry procedures.**	MP **If validating a SFA-conducted nutrient analysis (Option 2) for Targeted Menu Review, examine menu documentation with the SFA,** refer to the Nutrient Analysis and Validation Checklist, and **complete the On-site section of the Dietary Specifications Risk Assessment Tool** MP **If conducting a nutrient analysis (Option 3) for Targeted Menu Review, examine menu documentation with the SFA,** refer to the Nutrient Analysis and Validation Checklist, and **complete the On-site section of the Dietary Specifications Risk Assessment Tool**	O **Conduct SSO review (if applicable).** Issue SSO report as addendum to Administrative Review report. (SSO reviews will likely occur outside the range of dates covered in this timeline).

Recommended Prior to On-site Review	Required Prior to On-site Review	After completion of Off-site Assessment Tool and prior to On-site Review	On-site Review	Post Review
meal components and quantities. MP **Be mindful of Offer vs. Serve (OVS) policy** when reviewing meal compliance documentation. Perform optional OVS edit check. MP **If planning a targeted menu review using FNS-approved Menu Planning Tools for Certification for Six Cents Reimbursement (Option 4),** submit proposed methodology to FNS for approval prior to Administrative Review. O **Determine if the SFA operates the Seamless Summer Option (SSO).** If so, determine when SSO will be operating and schedule SSO review.				

Glossary of Terms

A la carte means food items available for cash sale independent of the reimbursable meal.

Administrative Review means the comprehensive off-site and on-site evaluation of all SFAs participating in the Program. The term "Administrative Review" is used to reflect a review of both Critical and General Areas, and includes other areas of program operations determined by the SA to be important to Program performance, with FNS approval.

Alternate meal service location means anywhere outside the typical food service area/cafeteria. Alternate meal locations include places such as classrooms, in-school suspension areas, and grab & go stations.

Average daily participation (ADP) means the average number of children, by eligibility category, participating in the Program each operating day. These numbers are obtained by dividing (a) the total number of free lunches claimed during a reporting period by the number of operating days in the same period; (b) the total number of reduced price lunches claimed during a reporting period by the number of operating days in the same period; and (c) the total number of paid lunches claimed during a reporting period by the number of operating days in the same period.

Base year is a term used with Special Provision 2 and Provision 3. For Provision 2, the base year is the last school year for which eligibility determinations were made and meal counts by type

were taken and during which all meals were served at no charge, or the last year in which a school conducted a streamlined base year period. It is the first year, and is part of Provision 2's four-year cycle. For Provision 3, the base year is the last complete school year for which eligibility determinations were made and meal counts by type were taken, or the last year in which a school conducted a streamlined base year period. The Provision 3 base year immediately precedes and is not included in the four-year cycle.

Benefit issuance means the link in the accountability system between the eligibility determination and the benefit delivery.

Categorical eligibility means any child who is a member of a SNAP, FDPIR household, or TANF assistance unit that is automatically eligible for free meals or free milk. Such households must provide current SNAP, TANF, or FDPIR case numbers on the application. Based on information retained by the LEA, children may be determined categorically eligible from documentation of foster children, Head Start, homeless, runaway, and migrant status, as specified in 7 CFR 245.6.

Certification/benefit Issuance means the process used to determine a student's eligibility for free or reduced price meal benefits and the method used to apply the correct meal benefit level for the student at the Point-of-service. The review of the certification documents may include a review of a household's application for meal benefits, direct certification information, or other source documentation. The review of the benefit issuance documents may include a review of a roster or medium of exchange (any type of ticket, token, ID, name or number) used in the process of providing a meal benefit.

Child means (a) a student of high school grade or under as determined by the State educational agency, who is enrolled in an educational unit of high school grade or under as described in the definition of "School", including students who are mentally or physically disabled as defined by the State and who are participating in a school program for the mentally or physically disabled; or (b) a person under 21 chronological years of age who is enrolled in residential child care

institution; or (c) for purposes of afterschool snacks, a child means an individual enrolled in an afterschool care program operated by an eligible school, who serves children up to 18 years of age or who turn 19 during the school year.

Child Nutrition Act of 1966 means a law enacted by Congress in 1966 (42 USC 1773 et seq.) to strengthen and expand domestic food service programs for children under the authority of the Secretary of Agriculture. These programs include Special Milk and School Breakfast Programs and State Administrative Expense Funds (SAE).

Child nutrition programs include the National School Lunch Program (7 CFR 210) (including the Fresh Fruit and Vegetable Program, the Seamless Summer Option, and afterschool snacks), Special Milk Program (7 CFR 215), School Breakfast Program (7 CFR 220), and the Food Distribution Program, as it relates to the donation of food to schools participating in the Child Nutrition Programs.

Civil rights means no child shall be denied benefits or be otherwise discriminated against because of race, color, national origin, age, sex, or disability. SAs and SFAs must comply with Title VI of the Civil Rights Act of 1964; Title IX of the Education Amendments of 1972; section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; 7 CFR 15, 15a, and 15b; and FNS Instruction 113-1, *Civil Rights Compliance and Enforcement – Nutrition Programs and Activities.*

Claim for Reimbursement means the claim submitted to a SA or FNSRO (where applicable) on a monthly basis by a SFA for reimbursement for meals served under the Child Nutrition Programs.

Closed Claim for Reimbursement means any month for which a Claim for Reimbursement was submitted.

Code of Federal Regulations (CFR) means the codification of the general and permanent rules published in the Federal Register by the executive departments and agencies of the Federal Government. Child nutrition regulations are contained in Title 7 of the CFR.

Corrective action means actions required to correct any violation identified under the Administrative Review and must be applied to all schools in the SFA, as appropriate, to ensure that previously deficient practices and procedures are revised system-wide. Corrective action may include correction of incorrect practices and training.

Critical areas mean Performance Standard 1 and Performance Standard 2, measures of performance under the Administrative Review, as described in 210.18(g).

Cycle menu means a set of food components and food items that are different for each day during a cycle and repeats.

Day(s) means calendar day(s) unless otherwise specified.

Day of Review is the day(s) on which the on-site review of the individual sites selected for review occurs.

Direct certification means the process of establishing children's categorical eligibility for benefits by obtaining documentation directly from the State or local SNAP, TANF, or FDPIR office that the children are from households currently receiving SNAP, TANF, or FDPIR benefits. Households determined eligible for benefits through direct certifications are not required to submit a free and reduced price application to the school.

Direct verification means using records from public agencies to verify income and/or student eligibility. Direct verification may be completed at the State or local level or through a joint effort at both levels. LEAs are not required to conduct direct verification. However, any SFA

that wishes to conduct direct verification must contact their SA for assistance with establishing a direct verification method. For further information, please consult FNS' *Eligibility Manual for School Meals*.

Documented corrective action means written documentation provided by the SFA to the SA describing the actions taken to correct violations and the dates of completion. Documented corrective action may be provided at the time of the review or may be submitted to the SA within specified timeframes.

Edit checks means the procedure used by the SFA to compare each school's daily counts of free, reduced price, and paid lunches against the product of the number of children in that school currently eligible for free, reduced price, and paid lunches, respectively, times an attendance factor.

Eligibility certification means the process used to determine a child's eligibility for benefits based on a free and reduced price application submitted by a household or through other certification documentation.

Entrance conference means the initial meeting between the SA and the SFA to discuss pre-review and review content and post-review procedures.

Exit conference means a meeting at the close of a review to communicate findings to appropriate officials.

Family means 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.

Finding: Identification of non-compliance with program regulations, FNS Instructions, and/or policy memoranda. Each finding is associated with a required corrective action.

First in, first out (FIFO) means an inventory accounting method by which the first items placed in inventory (i.e., foods and other meal service goods) are the first items used in meal preparation and production.

Fiscal action includes, but is not limited to, the recovery of overpayment through direct assessment or offset of future claims, disallowance of overclaims as reflected in unpaid Claims for Reimbursement, submission of a revised Claim for Reimbursement, and correction of records to ensure that unfiled Claims for Reimbursement are corrected when filed. It also includes disallowance of funds for failure to take corrective action to meet the meal requirements.

Fiscal year (FY) means a period of 12 calendar months beginning October 1 of any year and ending with September 30 of the following year. This period represents the Federal Fiscal Year. A State may have designated a periods other than October 1 through September 30 as its fiscal year. The Administrative Review uses the Federal Fiscal Year.

Food(s) of minimal nutritional value means the four categories of foods and beverages under 7CFR 210.11 and 220.12 (soda water, water ices, chewing gum, and certain candies) that cannot be served in areas where reimbursable meals are served and/or consumed unless the specific food item has been exempted from its foods of minimal nutritional value category by the Food and Nutrition Service.

Food and Nutrition Service (FNS) means the agency under the United States Department of Agriculture responsible for administering the National School Lunch, School Breakfast, Special Milk, and other nutrition and food assistance programs.

Food Distribution Program on Indian Reservations (FDPIR) means a nutrition assistance program administered by FNS that provides donated UDSA Foods to needy families residing on Indian reservations.

Food production record means the documentation of what was prepared and served. This documentation is necessary to support the claim for reimbursable meals and to identify information needed for the nutrient analysis.

Food service management company (FSMC) means a commercial enterprise or a nonprofit organization that is or may be contracted with by the SFA to manage any aspect of the school food service.

Free lunch means a lunch served under the Program to a child from a household eligible for such benefits under 7 CFR 245 and for which neither the child nor any member of the household pays or is required to work in the school or in the school's food service.

Free milk means milk served under the regulations governing the Special Milk Program for which neither the child nor any member of his family pays or is required to work in the school or in the school's food service. See 7 CFR 215 for more specific guidance.

Fresh Fruit and Vegetable Program (FFVP) means a USDA program under the National School Lunch Act that provides funding to States to make free fresh fruits and vegetables available in eligible elementary schools.

General areas mean the areas of review as specified in 7 CFR 210.18(h).

Hazard Analysis and Critical Control Points (HACCP) means a systematic preventive approach to food safety and pharmaceutical safety that addresses physical, chemical, and biological hazards as a means of prevention rather than finished product inspection.

Household (see Family)

Incomplete meal means any meal that does not meet the meal pattern and nutritional specification requirements set forth in 7 CFR 210 and 220, as applicable.

Limited English Proficient means an individual or household that does not speak English as their primary language and has a limited ability to read, speak, write, or understand English.

Local educational agency (LEA) means a public board of education or other public or private nonprofit authority legally constituted within a state having administrative control of schools.

Local school wellness policy means a comprehensive LEA-wide policy that establishes goals and guidelines for nutrition education, physical activity, nutrition promotion, and other school-based activities to promote student wellness, prevent and reduce childhood obesity, and provide assurance that school meal nutrition guidelines meet the minimum Federal school meal standards.

Lunch means a meal that meets the National School Lunch Program requirements for specified age/grade groups of children as designated in 7 CFR 210.10.

Meal component/food component means one of the required food groups that comprise a reimbursable meal: meats/meat alternates, grains, vegetables, fruits, and milk.

Medium of exchange means cash or any type of ticket, token, ID, name, biometric identifier, or number that eligible students exchange to obtain a meal.

Miscategorization occurs when a determining official has approved a student in a category other than the one supported by either a SNAP, TANF, or FDPIR number, or by the household size and income information provided by the household.

National School Lunch Act means the legislation that established the National School Lunch Program (NSLP) (42 USC 1751 et seq.) in 1946.

National School Lunch Program (NSLP) means the Program under which participating schools operate a nonprofit lunch program in accordance with 7 CFR 210. General and special cash assistance and donated food assistance are made available to schools in accordance with 7 CFR 210.

Non-base year means any year outside the base year, including the extension years for Provision 2 and Provision 3 schools.

Non-systemic error means an error in which the contributing factors are unusual or not part of the normal operating procedure, and the system does not require changes to achieve accurate results.

Observation: Identification of a weakness in program operations or management that does not rise to the level of a finding. Each observation is associated with a suggestion.

Offer versus serve (OVS) means a provision that allows students to decline a specific number of food components/food items depending on the menu planning approach used.

Open Claim for Reimbursement means any month for which a Claim for Reimbursement has not been submitted.

Operating days are those days when lunches are served under the National School Lunch Program.

Overclaim means the portion of a SFA's Claim for Reimbursement that exceeds the Federal financial assistance that is properly payable.

Overt identification means when students receiving free or reduced price benefits are openly or physically identified by students or adults as receiving meals at the free or reduced price rate.

Paid lunch means a lunch served to children who are either not certified for or elect not to receive the free or reduced price benefits offered under 7 CFR 245.

Participation factor means the percentages of children approved by the school for free, reduced price, and paid lunches, respectively, who are participating in the Program. The free participation factor is derived by dividing the number of free lunches claimed for any given period by the product of the number of children approved for free lunches for the same period times the operating days in that period. A similar computation is used to determine the reduced price and paid participation factors. The number of children approved for paid lunches is derived by subtracting the number of children approved for free and reduced price lunches for any given period from the total number of children enrolled in the reviewed school for the same period of time, if available. If such enrollment figures are not available, the most recent total number of children enrolled shall be used. If SFA participation factors are unavailable or unreliable, State-wide data must be employed.

Participation rate means the ratio of free, reduced price, and paid meals served to the total number of meals served.

Performance Standard 1 means the standard requiring that all free, reduced price, and paid meals claimed for reimbursement are served only to children eligible for free, reduced price, and paid meals, respectively; and counted, recorded, consolidated, and reported through a system which consistently yields correct claims. (7 CFR 210.18(g))

Performance Standard 2 means the standard requiring that reimbursable lunches must meet the meal requirements in 7 CFR 210.10, as applicable to the age/grade group reviewed.

Reimbursable breakfasts must meet the meal requirements in 7 CFR 220.8 and 220.23, as applicable to the age/grade group reviewed. (7 CFR 210.18(g))

Point-of-service means the point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price, or paid lunch has been served to an eligible child.

Recalculation means a method for determining the number of lunches that are eligible for reimbursement in schools that do not have reliable reimbursable meal data.

Reduced price lunch means a lunch served under the Program: (a) to a child from a household eligible for such benefits under 245; (b) for which the price is less than the SFA designated full price of the lunch and that does not exceed the maximum allowable reduced price specified under 245; and (c) for which neither the child nor any member of the household is required to work in the school or in the school's food service.

Reimbursable meal means a meal meeting the USDA meal pattern requirements, served to an eligible student, and priced as an entire meal rather than based on individual items. Such a meal qualifies for reimbursement with Federal funds.

Reimbursement means Federal cash assistance, including advances paid or payable to participating schools for lunches meeting the requirements of 210.10 and served to eligible children.

Residential child care institution (RCCI) means any distinct part of a public or nonprofit private institution that (1) maintains children in residence, (2) operates principally for the care of children, and (3) if private, is licensed by the State or local government to provide residential child care services under the appropriate licensing code.

Review period is the most recent month for which a Claim for Reimbursement was submitted, provided that it covers at least ten (10) operating days.

Reviewed school means the school(s) selected for review using the school selection procedures.

Reviewed students are the students selected for the certification and benefit issuance review.

School means: (a) An educational unit of high school grade or under, recognized as part of the educational system in the State and operating under public or nonprofit private ownership in a single building or complex of buildings; (b) any public or nonprofit private classes of preprimary grade when they are conducted in the aforementioned schools; or (c) any public or nonprofit private residential child care institution, or distinct part of such institution, that operates principally for the care of children, and, if private, is licensed to provide residential child care services under the appropriate licensing code by the State or a subordinate level of government, except for residential summer camps which participate in the Summer Food Service Program for Children, Job Corps centers funded by the Department of Labor, and private foster homes.

School Breakfast Program (SBP) means the program authorized by Section 4 of the Child Nutrition Act of 1966, which provides meals to children in the morning hours served at or close to the beginning of the child's day at school and that meets the nutritional requirements set out in 7 CFR 220.8.

School food authority (SFA) means the governing body that is responsible for the administration of one or more schools, and has the legal authority to operate the Program therein or be otherwise approved by FNS to operate the Program.

School year (SY) means a period of 12 calendar months beginning July 1 of any year and ending June 30 of the following year.

Seamless Summer Option (SSO) means an option under the National School Lunch Program and School Breakfast Program that allows schools to provide breakfasts and lunches to children in low income areas during the summer months and other school vacation periods.

Self-service station or **self-service food bar** means any place in the food service operation where students serve themselves.

Site means the physical location where Program meals are offered to children.

Special Milk Program (SMP) means the program under which participating schools receive cash assistance for each half-pint of milk served in accordance with 7 CFR 215.

Special Provision Options (SPOs) are alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced price school meals and daily meal counts by type (free, reduced price and paid meals) at the point-of-service. These provisions are intended to reduce paperwork at the local level.

State agency (SA) means (a) the State educational agency; (b) any other agency of the State that has been designated by the Governor or other appropriate executive or legislative authority of the State and approved by the Department to administer the Program in schools, as specified in 7 CFR 210.3(b); or (c) the FNSRO, where the FNSRO administers the Program as specified in 7 CFR 210.3(c).

Student with disabilities means any child who has a physical or mental impairment as defined in 7 CFR 15(b)(3) of USDA's nondiscrimination regulations.

Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program, operates under the Food Stamp Act of 1977.

Supplemental Nutrition Assistance Program household means any individual or group of individuals that is currently certified to receive assistance as a household under the Supplemental Nutrition Assistance Program.

Systemic error means an error that occurs when any of the contributing factors are built into the process and would likely recur if the process is not changed.

Technical assistance means help or advice provided to the SFA or school, by the SA or FNS, to improve program operations.

Temporary Assistance for Needy Families (TANF) means the State funded program under Part A of Title IV of the Social Security Act that the Secretary determines complies with standards established by the Secretary that ensure that the standards under the State program are comparable to or more restrictive than those in effect on June 1, 1995. This program is commonly referred to as Temporary Assistance for Needy Families, although States may refer to the program by another name.

Underclaim means the Claim for Reimbursement submitted by a SFA that requests less than the amount deemed properly reimbursable.

United States Department of Agriculture (USDA) means the Federal agency designated by Congress to administer the NSLP, SBP, and SMP.

Verification means confirmation of eligibility for free or reduced price benefits under the NSLP or SBP. Verification includes confirmation of income eligibility and, at State or local discretion,

may also include confirmation of any other information required in the application, which is defined as documentation in 7 CFR 245.2.

Authorities

7 CFR 210.18

Administrative Review Manual

Can be found here: http://www.doe.sd.gov/cans/documents/18-ARmanual.pdf

Administrative Review Manual

For monitoring of program requirements under the National School Lunch Program, School Breakfast Program, and other Federal school nutrition programs

Administrative Reviews

This list is TENTATIVE

The SFAs listed below should receive an SNP Administrative Review during the School Year indicated.

Administrative Review SY2017-2018	
1730600	Abbott House, Mitchell
2100100	Armour School District 21-1, Armour
090000	Belle Fourche School District 09-1, Belle Fourche
0300100	Bennett County School District 03-1, Martin
2500100	Big Stone City School District 25-1, Big Stone City
4500400	Britton-Hecla School District 45-4, Britton
6000100	Centerville School District 60-1, Centerville
6100800	Dakota Valley School District 61-8, North Sioux City
5600200	Doland School District 56-2, Doland
6100700	Elk Point-Jefferson School District 61-7, Elk Point
5030100	Flandreau Indian School, Flandreau
5000300	Flandreau School District 50-3, Flandreau
2600400	Gregory School District 26-4, Gregory
2800300	Hamlin School District 28-3, Hayti
4100200	Harrisburg School District 42-1, Harrisburg
0200300	Iroquois School District 02-3, Iroquois
3500300	Kadoka Area School District 35-3, Kadoka
4500500	Langford School District 45-5, Langford
4100400	Lennox School District 41-4, Lennox
3900200	Madison School District 39-2, Madison
4932900	McCrossan Boys Ranch, Sioux Falls
4600100	Mead County School District 46-1, Sturgis
2500400	Milbank School District 25-4, Milbank
4300200	Montrose School District 43-2, Montrose
3200200	Pierre Public School 32-2, Pierre
5130800	Rapid City Catholic School System, Rapid City
6530100	Red Cloud Indian School, Pine Ridge
5400400	Rosholt School District 54-4, Rosholt
3900400	Rutland School District 39-4, Rutland
6330100	Sacred Heart School, Yankton
5500500	Sanborn Central School District 55-5, Forestburg
4930300	Sioux Falls Catholic Schools, Sioux Falls
0500500	Sioux Valley School District 05-5, Volga
5400200	Sisseton School District 5402, Sisseton
2600500	South Central School District 26-5, Bonesteel
4000200	Spearfish School District 5902, Spearfish
3930100	St. Thomas Aquinas School, Madison
4100500	Tea Area School District 41-5, Tea
3300500	Tripp-Delmont School District 33-5, Tripp
5900200	Winner School District 59-2, Winner
6300300	Yankton School District 63-3, Yankton
1740400	YWCA Mitchell, Mitchell

Administrative Review SY2018-2019	
0630100	Aberdeen Catholic Schools, Aberdeen
0600100	Aberdeen School District 06-1, Aberdeen
5800300	Agar-Blunt-Onida School District 58-3, Onida
0330100	American Horse Day School, Allen
1100100	Andes Central School District 11-1, Lake Andes
3800100	Arlington School District 38-1, Arlington
0400100	Avon School District 04-1, Avon
4900100	Baltic School District 49-1, Baltic
5200100	Bison School District 52-1, Bison
0400200	Bon Homme School District 04-2, Bon Homme
2200100	Bowdle School District 22-1, Bowdle
4900200	Brandon Valley School District 49-2, Brandon Valley
3000300	Bridgewater-Emery School District 30-3, Bridgewater
0500100	Brookings School District 05-1, Brookings
2600200	Burke School District 26-2, Burke
4300100	Canistota School District 43-1, Canistota
4100100	Canton School District 41-1, Canton
3900100	Chester Area School District 39-1, Chester
2030200	Cheyenne River BIE Schools, Eagle Butte
5000500	Colman-Egan School District 50-5, Colman
5900300	Colome School District 59-3, Colome
0870200	Crow Creek Sioux Tribe, Stephan
1600100	Custer School District 16-1, Custer
3800200	DeSmet School District 38-2, DeSmet
0500600	Deubrook Area School District 05-6, Deubrook
5100100	Douglas School District 51-1, Box Elder
6400200	Dupree School District 64-2, Dupree
4600200	Faith School District 46-2, Faith
1400100	Florence School District 14-1, Florence
4900400	Garretson School District 49-4, Garretson
5300100	Gettysburg School District 53-1, Gettysburg
2700100	Haakon School District 27-1, Philip
3000100	Hanson School District 30-1, Alexandria
3100100	Harding County School District 31-1, Buffalo
1400200	Henry School District 14-2, Henry
1000100	Herreid School District 10-1, Herreid
0200200	Huron School District 02-2, Huron
1730200	John Paul II Elementary School, Mitchell
3700300	Jones County School District 37-3, Murdo
4400200	Leola School District 44-2, Leola
6140100	Lutheran Social Services, Sioux Falls
4300700	McCook Central School District 43-7, Salem
1500100	McIntosh School District 15-1, McIntosh
1500200	McLaughlin School District 15-2, McLaughlin
1700200	Mitchell School District 17-2, Mitchell
6200600	Mobridge-Pollock School District 62-6, Mobridge

5100300	New Underwood School District 51-3, New Underwood
0900200	Newell School District 09-2, Newell
3230100	Pierre Indian Learning Center, Pierre
6531100	Pine Ridge School, Pine Ridge
6834100	SD Dept of Social Services, Yankton
4933000	Sioux Falls Lutheran School Association, Sioux Falls
1500300	Smee School District 15-3, Wakpala
6630100	St. Francis Indian School, St. Francis.
1430300	St. Martins Lutheran School, Watertown
4930400	St. Mary Catholic School, Dell Rapids
5700100	Stanley County School District 57-1, Ft. Pierre
5400600	Summit School District 54-6, Summit
2030300	Tiospaye Topa, La Plant
4900600	Tri-Valley School District 49-6, Colton
5100500	Wall School District 51-5, Wall
0600500	Warner School District 06-5, Warner
1400500	Waverly School District 14-5, Waverly
1800500	Webster School District 18-5, Webster
4900700	West Central School District 49-7, Hartford
5140100	Western SD Juvenile Services Center, Rapid City
5400700	Wilmot School District 54-7, Wilmot

Administrative Review SY2019-2020	
6100100	Alcester-Hudson School District 61-1, Alcester
6100200	Beresford School District 61-2, Beresford
2800100	Castlewood School District 28-1, Castlewood
0700100	Chamberlain School District 07-1, Chamberlain
4932000	Children's Home Society of SD, Sioux Falls
1200200	Clark School District 12-2, Clark
2100200	Corsica-Stickney School District, Corsica
2130300	Dakota Christian School, Corsica
4900300	Dell Rapids School District 49-3, Dell Rapids
1900400	Deuel School District 19-4, Clear Lake
4920300	East Dakota Educational Cooperative, Sioux Falls
2300100	Edgemont School District 23-1, Edgemont
2200500	Edmunds Central School District 22-5, Roscoe
0500300	Elkton School District 05-3, Elkton
1830100	Enemy Swim Day School, Waubay
2800200	Estelline School District 28-2, Estelline
1700100	Ethan School District 17-1, Ethan
4400100	Eureka School District 44-1, Eureka
2400400	Faulkton School District 24-4, Faulkton
0600200	Frederick Area School District 06-2, Frederick
3300100	Freeman School District 33-1, Freeman
6300100	Gayville-Volin School District 63-1, Gayville
0600600	Groton School District 06-6, Groton
3400200	Highmore-Harrold School District 34-2, Highmore
5100200	Hill City School District 51-2, Hill City
5600600	Hitchcock-Tulare School District 56-6, Hitchcock
2300200	Hot Springs School District 23-2, Hot Springs
5300200	Hoven School District 53-2, Hoven
4800300	Howard School District 48-3, Howard
6530700	Isna Wica Owayawa (Loneman), Oglala
0230400	James Valley Christian School, Huron
3800300	Lake Preston School District 38-3, Lake Preston
4000100	Lead-Deadwood School District 40-1, Lead
5200400	Lemmon School District 52-4, Lemmon
4931600	Lifescape - Children's Care Hospital And School, Sioux Falls
1530300	Little Eagle School, Little Eagle
6530600	Little Wound School System, Little Wound
4270200	Lower Brule Sioux Tribe, Lower Brule
4200100	Lyman School District 42-1, Presho
1130100	Marty Indian School, Marty
3300200	Menno School District 33-2, Menno
2900400	Miller School District 29-4, Miller
4933700	Minnehaha County Juvenile Detention Center, Sioux Falls
1700300	Mount Vernon School District 17-3, Mount Vernon
5600700	Northwestern School District 56-7, Mellette
2300300	Oelrichs School District 23-3, Oelrichs

6500100	Oglala Lakota School District 65-1, Batesland
3900500	Oldham-Ramona School District 39-5, Ramona
0240100	Our Home Inc., Huron
0100100	Plankinton School District 01-1, Plankinton
1100500	Platte-Geddes School District 01-1, Platte
6530300	Porcupine Contract School, Purcupine
6840000	SD Department of Corrections, Pierre
4900500	Sioux Falls School District 49-5, Sioux Falls
3230300	St Joseph Catholic School, Pierre
6430200	Takini School, Takini
2000300	Timber Lake School District 20-3, Timber Lake
5430200	Tiospa Zina Tribal School, Agency Village
6600100	Todd County School District 66-1, Mission
6000600	Viborg-Hurley School District 60-6, Viborg
4933600	Volunteers of America - Dakotas, Sioux Falls
1100400	Wagner Community School District 11-4, Wagner
1400400	Watertown School District 14-4, Watertown
0100300	White Lake School District 01-3, White Lake
4700100	White River School District 47-1, White River
5500400	Woonsocket School District 55-4, Woonsocket
6530200	Wounded Knee School System, Wounded Knee

Administrative Review SY2020-2021	
1730600	Abbott House, Mitchell
2100100	Armour School District 21-1, Armour
0900100	Belle Fourche School District 09-1, Belle Fourche
0300100	Bennett County School District 03-1, Martin
2500100	Big Stone City School District 25-1, Big Stone City
5150400	Boy Scouts Of America - Black Hills Area, Custer
0450100	Boy Scouts Of America - Sioux Council, Sioux Falls
4500400	Britton-Hecla School District 45-4, Britton
6000100	Centerville School District 60-1, Centerville
3530100	Crazy Horse Day School, Wanblee
6100800	Dakota Valley School District 61-8, North Sioux City
5600200	Doland School District 56-2, Doland
6100700	Elk Point-Jefferson School Dist. 61-7, Elk Point
5030100	Flandreau Indian School, Flandreau
5000300	Flandreau School District 50-3, Flandreau
3330400	Freeman Academy, Freeman
2600400	Gregory School District 26-4, Gregory
2800300	Hamlin School District 28-3, Hayti
4100200	Harrisburg School District 41-2, Harrisburg
1430400	Immaculate Conception School, Watertown
2200600	Ipswich School District 22-6, Ipswich
1300300	Irene - Wakonda School District 13-3, Irene
0200300	Iroquois School District 02-3, Iroquois
3500300	Kadoka Area School District 35-3, Kadoka
0700200	Kimball School District 07-2, Kimball
4500500	Langford School District 45-5, Langford
4100400	Lennox School District 41-4, Lennox
4950300	Lutheran Outdoors of South Dakota, Sioux Falls
3900200	Madison Central School District 39-2, Madison
6000300	Marion School District 60-3, Marion
4932900	McCrossan Boys Ranch, Sioux Falls
4600100	Meade School District 46-1, Sturgis
2500400	Milbank School District 25-4, Milbank
4300200	Montrose School District 43-2, Montrose
6000400	Parker School District 60-4, Parker
3300300	Parkston School District 33-3, Parkston
3200200	Pierre Public School 32-2, Pierre
5100400	Rapid City Area School District 51-4, Rapid City
5130800	Rapid City Catholic School System, Rapid City
6530100	Red Cloud Indian School, Pine Ridge
5600400	Redfield School District 56-4, Redfield
5400400	Rosholt School District 54-4, Rosholt
3900400	Rutland School District 39-4, Rutland
6330100	Sacred Heart School, Yankton
5500500	Sanborn Central School District 55-5, Forestburg
0400300	Scotland School District 04-3, Scotland

6200500	Selby Area School District 62-5, Selby
4930300	Sioux Falls Catholic Schools, Sioux Falls
0500500	Sioux Valley School District 05-5, Volga
5400200	Sisseton School District 54-2, Sisseton
2600500	South Central School District 26-5, Bonesteel
4000200	Spearfish School District 40-2, Spearfish
1330100	St Agnes School, Vermillion
3930100	St Thomas Aquinas School, Madison
4100500	Tea Area School District 41-5, Tea
0631300	Trinity Lutheran, Aberdeen
3300500	Tripp-Delmont School District 33-5, Tripp
5151300	United Methodist Church - Dakota United Methodist Camping, Mitchell
1300100	Vermillion School District 13-1, Vermillion
1800300	Waubay School District 18-3, Waubay
3600200	Wessington Springs School District 36-2, Wessington Springs
1200300	Willow Lake School District 12-3, Willow Lake
5900200	Winner School District 59-2, Winner
0200600	Wolsey Wessington School District 2-6, Wolsey
6300300	Yankton School District 63-3, Yankton
1740400	YWCA Mitchell, Mitchell
6230100	Zion Evangelical Lutheran School, Mobridge

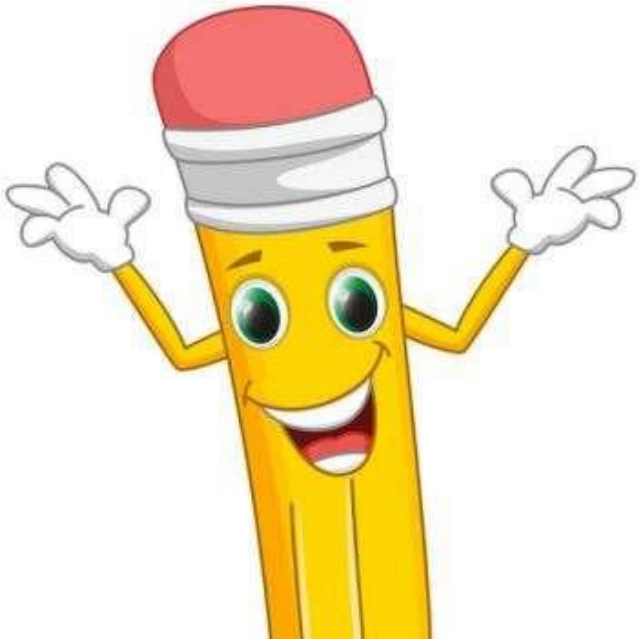
Administrative Review List

a. Can be found here: https://doe.sd.gov/cans/documents/19-Review.pdf

Administrative Reviews

This list is TENTATIVE

The SFAs listed below should receive an SNP Administrative Review during the School Year indicated.



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To: Authorized Representatives Child Nutrition Programs

From: Child and Adult Nutrition Services

Date: May 10, 2018

Subject: On-Site Review Worksheet Assessment of the School Meal Count System

Memo Number: SNP 228-1

This numbered memo supersedes the previous memo #52.1. All Child & Adult Nutrition Services memos are available on the Child & Adult Nutrition Services website.

Every school year, each School Food Authority (SFA) with more than one school must perform no less than one on-site review of the meal counting and claiming system and some general areas identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and half of the schools operating the School Breakfast Program (SBP).

Procedure:
This on-site review shall take place prior to February 1 of each school year. If the review finds problems with a school's meal counting or claiming procedures or general areas, the SFA shall: ensure the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review must ensure that the school's claim is based on an acceptable and approved counting and claiming system, as implemented, and yields the actual number of reimbursable free, reduced price, and paid meals, respectively, served for each day of operation.

At a minimum, Attachment 1 must be completed annually by February 1 for each location where lunch meals are served and at least half of your breakfast meals are served. Attachment 2 is an optional review that can be completed to review all aspects of the Child Nutrition Programs whether there is only one site or multiple serving sites. Attachment 1 must be completed by the Authorized Representative to review meal counting and claiming procedures. Attachment 2 does not have a mandatory deadline but reviews a combination of food service concerns and can be completed by the school administrator and/or the food service director or kitchen manager. The completed attachments should be filed with yearly records and kept on file for the current year and the next three succeeding years.

Definitions:

- **Approved Point of Service**: the approval occurs in your annual application with CANS (in the iCAN system). Review your "Meal Count Method" Checklist document.
- **Civil rights:** In the operation of the School Nutrition Programs, no child shall be denied benefits or be otherwise discriminated against because of race, color, national origin, age, sex, or disability. State agencies and school food authorities shall comply with the requirements of: Title VI of the Civil Rights Act of 1964; title IX of the Education

Amendments of 1972; section 504 of the Rehabilitation Act of 1973; the Age Discrimination Act of 1975; Department of Agriculture regulations on nondiscrimination (7 CFR parts 15, 15a, and 15b); and FNS Instruction 113-1.

- **Competitive food**: all food and beverages other than reimbursable meals available for sale to students on the School campus during the School day (midnight before to 30 minutes after the school day ends).
- **Incomplete Meal:** a meal that does not contain the required meal components. The requirements for a complete meal are different for breakfast and lunch, and offer versus serve or no offer versus serve.
- **Indirect costs:** School food authorities must follow fair and consistent methodologies to identify and allocate allowable indirect costs to the nonprofit school food service account, in accordance with 2 CFR part 200 as implemented by 2 CFR part 400.
- **Nonprofit school food service account:** is the dedicated account for only food service operations conducted by the school food authority principally for the benefit of schoolchildren, all of the revenue from which is used solely for the operation or improvement of such food services.
- **Nonprogram Food:** are those foods and beverages: (i) Sold in a participating school other than reimbursable meals and meal supplements; and (ii) Purchased using funds from the nonprofit school food service account. Revenue from nonprogram foods. The proportion of total revenue from the sale of nonprogram foods to total revenue of the school food service account shall be equal to or greater than: (i) The proportion of total food costs associated with obtaining nonprogram foods to (ii) The total costs associated with obtaining program and nonprogram foods from the account. All revenue from the sale of nonprogram foods shall accrue to the nonprofit school food service account of a participating school food authority.
- **Overt Identification:** when the eligibility of a student can be determined by using color, symbols, numbers, letters, codes, or another method of identification in the meal service area.
- **Paid Lunch Equity:** the average student paid lunch price is equal to/greater than the reimbursement difference (free reimbursement rate minus the paid reimbursement rate).
- **Point of Service**: means that point in the food service operation where a determination can accurately be made that a reimbursable free, reduced price or paid lunch has been served to an eligible child.
- **Professional Standards:** establishes minimum hiring standards for school nutrition program directors and continuing education/training standards for all staff with responsibility for school nutrition programs.

Attachment 1

On-Site Monitoring Required Worksheet

Assessment of the Meal Counting and Claiming System and Some General Areas

Complete once per school year, before February 1. Each School Food Authority (SFA) with more than one school site must perform at least one on-site review of the meal counting and claiming system and some general areas of review in each school site operating the National School Lunch Program (NSLP) and 50% of school sites operating the School Breakfast Program (SBP) under its jurisdiction.

Each on-site review must ensure the school's claim is based on the counting and claiming system, as approved by CANS in the annual application, and yields the actual number of reimbursable free, reduced price, and paid meals, respectively, served for each day of operation.

If the review indicates problems with a school's meal counting and claiming procedures or general review areas, the SFA must ensure that the school site(s) implements corrective action, and within 45 days of the review, conduct a follow-up on-site review to determine that the corrective action resolved the problems.

School Name:_____ **Review Date:** _____

SFA Reviewer: _____

SCHOOL BREAKFAST PROGRAM ON-SITE REVIEW: Answer the following questions.

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM			
☐	☐	1. Is the method used for counting reimbursable meals in compliance with the approved point of service requirement? (Meal counts must be taken at the location(s) where complete meals are served to children.)			
☐	☐	2. Is the point of service meal count used to determine the school's claim for reimbursement?			
☐	☐	3. Is the person responsible for monitoring and counting meals correctly identifying reimbursable meals?			
☐	☐	4. Is the school correctly implementing policies for handling the following (as applicable):			
		Yes	**No**	**N/A**	
		☐	☐	☐	Incomplete meals?
		☐	☐	☐	Second meals? (a complete 2nd meal with all foods offered in the 1st meal)
		☐	☐	☐	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
		☐	☐	☐	Visiting student meals?
		☐	☐	☐	Adult and non-student meals (and identifying program vs non-program)?
		☐	☐	☐	A la carte?
		☐	☐	☐	Student worker meals?
		☐	☐	☐	Field Trips?
		☐	☐	☐	Charged and/or prepaid meals?
		☐	☐	☐	Offer vs Serve?
		☐	☐	☐	Unpaid meal charges
☐	☐	5. Is there a method of identifying non-reimbursable meals (i.e., not meeting meal pattern requirements, seconds, adult meals, etc.) and distinguishing them from reimbursable meals?			

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM CONT.
☐	☐	6. Is someone trained as a backup for the monitor and the meal counter?
☐		7. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available? Do staff know when and how to implement them?
☐	☐	8. Are daily counts correctly totaled and recorded?
☐	☐	9. If claims are aggregated, are the meal counts correctly totaled and consolidated?
☐	☐	10. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made? *Record today's meal counts by category and compare to the total number of students eligible by category*

Number of Students Approved by Category	Today's Meal Counts by Category
Free:	Free:
Reduced Price:	Reduced Price:
Paid:	Paid

☐	☐	11. Does the system prevent overt identification of children receiving free or reduced price meals?

NOTE: The following two questions are for all SFAs <u>except</u> for SFAs on Provision 2 or 3 in non-base years, CEP, or RCCIs with only residential children

YES	NO	
☐	☐	12. Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals by category (free, reduced price, paid)?
☐	☐	13. If applicable according to 7 CFR 220.11(d) are comparisons of daily free, reduced price and paid breakfast counts against data which will assist in the identification of breakfast counts in excess of the number of free, reduced price and paid breakfasts served each day to children eligible for such breakfasts completed?

SBP CORRECTIVE ACTION PLAN (for any "NO" answers above):

SPECIFY DATE SBP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:_____

BY WHOM:_____

YES	NO	READILY OBSERVABLE GENERAL AREAS
☐	☐	1. Were any issues readily observed in relation to resource management?

YES	NO	
☐	☐	Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)
☐	☐	Paid Lunch Equity? (7 CFR 210.14(e))
☐	☐	Revenue from Nonprogram Foods? (7 CFR 210.14(f))
☐	☐	Indirect Costs? (2 CFR Part 200 and 7 CFR 210.14(g))

		2. Were any issues readily observed in other general areas?		
		YES	**NO**	
		☐	☐	Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
		☐	☐	Civil Rights (7 CFR 210.23(b))
		☐	☐	Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
		☐	☐	Food Safety (7 CFR 210.13)
		☐	☐	Competitive Food Service (7 CFR 210.11 and 220.12)
		☐	☐	Water must be made available during breakfast and lunch meal service (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
		☐	☐	Professional Standards (7 CFR 210.31)
		☐	☐	SBP and SFSP Outreach (7 CFR 210.12(d))
		☐	☐	Local School Wellness Policies (7 CFR 210.30)
		☐	☐	Other

SBP CORRECTIVE ACTION PLAN (for any "NO" answers above):

SPECIFY DATE SBP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

SIGNATURE: _____ _____ _____
School Representative Title Date

_____ _____ _____
SFA Reviewer Title Date

SBP FOLLOW-UP VISIT (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up: _____

Observations of corrective action implementation:

SIGNATURE: _____ _____ _____
School Representative Title Date

_____ _____ _____
SFA Reviewer Title Date

NATIONAL SCHOOL LUNCH PROGRAM ON-SITE REVIEW (Review Date:)

YES	NO	MEAL COUNTING AND CLAIMING SYSTEM
☐	☐	14. Is the method used for counting reimbursable meals in compliance with the approved point of service requirement? (Meal counts must be taken at the location(s) where complete meals are served to children.)
☐	☐	15. Is the point of service meal count used to determine the school's claim for reimbursement?
☐	☐	16. Is the person responsible for monitoring meals correctly identifying reimbursable meals?
		17. Is the school correctly implementing policies for handling the following (as applicable):

Yes	No	N/A	
☐	☐	☐	Incomplete meals?
☐	☐	☐	Second meals?
☐	☐	☐	Lost, stolen, misused, forgotten or destroyed tickets, tokens, IDs, etc.?
☐	☐	☐	Visiting student meals?
☐	☐	☐	Adult and non-student meals (and identifying program vs non-program)?
☐	☐	☐	A la carte?
☐	☐	☐	Student worker meals?
☐	☐	☐	Field Trips?
☐	☐	☐	Charged and/or prepaid meals?
☐	☐	☐	Offer vs Serve?
☐	☐	☐	Unpaid meal charges?

☐	☐	18. Is there a method of identifying non-reimbursable meals (i.e. not meeting meal pattern requirements, seconds, adult meals, etc.) and distinguishing them from reimbursable meals?
☐	☐	19. Is someone trained as a backup for the monitor and the meal counter?
☐	☐	20. Are there procedures for meal counting and claiming when the primary counting and claiming system is not available? Do staff know when and how to implement them?
☐	☐	21. Are daily counts correctly totaled and recorded?
☐	☐	22. If claims are aggregated, are the meal counts correctly totaled and consolidated?
☐	☐	23. Are internal controls (edits, monitoring, etc.) established to ensure that daily counts do not exceed the number of students eligible or in attendance and that an accurate claim is made?

Record today's meal counts by category and compare to the total number of students eligible by category

Number of Students Approved by Category	Today's Meal Counts by Category
Free:	Free:
Reduced Price:	Reduced Price:
Paid:	Paid:

☐	☐	24. Does the system prevent overt identification of children receiving free or reduced price meals?

NOTE: The following two questions are for all SFAs <u>except</u> for SFAs on Provision 2 or 3 in non-base years, CEP, or RCCIs with only residential children

YES	NO	
☐	☐	25. Is a current eligibility list kept up-to-date and used by the meal counting system to provide an accurate daily count of reimbursable meals by category (free, reduced price, paid)?
☐	☐	26. If applicable according to 7 CFR 210.8(a)(3), are edit checks completed and documented which compare the daily counts of free, reduced price, and paid meals against the product of the number of children currently eligible for free, reduced price,

		and paid meals, respectively, times an attendance factor (and any discrepancies accounted for)?

NSLP CORRECTIVE ACTION PLAN (for any "NO" answers above):

SPECIFY DATE NSLP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

YES	NO	READILY OBSERVABLE GENERAL AREAS		
		3. Were any issues readily observed in relation to resource management?		
		YES	**NO**	
		☐	☐	Maintenance of the Nonprofit School Food Service Account? (7 CFR 210.2, 210.14, 210.19(a), 210.21)
		☐	☐	Paid Lunch Equity? (7 CFR 210.14(e))
		☐	☐	Revenue from Nonprogram Foods? (7 CFR 210.14(f))
		☐	☐	Indirect Costs? (2 CFR Part 200 and 7 CFR 210.14(g))
		4. Were any issues readily observed in other general areas?		
		YES	**NO**	
		☐	☐	Free and Reduced Price Process – including verification, notification, and other procedures (7 CFR Part 245)
		☐	☐	Civil Rights (7 CFR 210.23(b))
		☐	☐	Reporting and Recordkeeping (7 CFR Parts 210, 220, and 245)
		☐	☐	Food Safety (7 CFR 210.13)
		☐	☐	Competitive Food Service (7 CFR 210.11 and 220.12)
		☐	☐	Water (7 CFR 210.10(a)(1)(i) and 220.8(a)(1))
		☐	☐	Professional Standards (7 CFR 210.30)
		☐	☐	SBP and SFSP Outreach (7 CFR 210.12(d))
		☐	☐	Local School Wellness Policies (7 CFR 210.30)
		☐	☐	Other

NSLP CORRECTIVE ACTION PLAN (for any "NO" answers above):

SPECIFY DATE NSLP CORRECTIVE ACTION(S) WILL BE IMPLEMENTED: _____

BY WHOM: _____

SIGNATURE: _____ _____ _____

School Representative Title Date

_____ _____ _____

SFA Reviewer Title Date

NSLP FOLLOW-UP VISIT (must be conducted within 45 days if corrective action was required):

Date(s) of Follow-Up:_____

Observations of corrective action implementation:

SIGNATURE: _____ _____ _____

School Representative | Title | Date

_____ _____ _____

SFA Reviewer | Title | Date

SFA:	**School:**			
REVIEW AREAS	**YES**	**NO**	**N/A**	**COMMENTS**
For Provision 2 Agencies (Not a Base Year only, follow standard directions during a Base Year)				
18. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
19. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
20. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
21. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	
22. Are the applications from a base year still available? (Records must be kept longer than three years.)	☐	☐	☐	
23. Does the SFA report meal counts based on percentages that were established during the base year? (Is the base year monthly percentages chart used when submitting the monthly claims?)	☐	☐	☐	
24. Have administrative staff attended an approved refresher training offered by CANS for current school year?	☐	☐	☐	
For Provision 3 Agencies (Not a Base Year only, follow standard directions during a Base Year)				
25. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
26. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
27. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
28. Does the SFA submit monthly meal counts based on enrollment using percentage factor established in base year rather by student names or actual meal counts?	☐	☐	☐	
29. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	

30. Are the applications from the base year still available? (Records must be kept longer than three years.)	☐	☐	☐	
31. Have administrative staff participated in an approved refresher training offered by CANS for current school year?	☐	☐	☐	
For Community Eligibility Provision (CEP)				
18. Has the SFA discontinued collecting meal benefit applications on a yearly basis?	☐	☐	☐	
19. Is the meal count person checking to be sure each student has selected a reimbursable meal?	☐	☐	☐	
20. Is the program a non-pricing program? (no money is being collected for student meals.)	☐	☐	☐	
21. Does the meal count person know they do NOT have to record meal counts by student names?	☐	☐	☐	
22. Is the documentation of student direct certification from the April prior to year one still available? (Records must be kept longer than three years.)	☐	☐	☐	
23. Does the SFA report meal counts based on percentages that were established during the base year? (Is the base year monthly percentages chart used when submitting the monthly claims?)	☐	☐	☐	
24. Have administrative staff attended an approved refresher training offered by CANS for current school year?	☐	☐	☐	

Attachment 2
On-Site Monitoring Optional Worksheet

SFA:	School:			
REVIEW AREAS	**YES**	**NO**	**N/A**	**COMMENTS**
Civil Rights				
1. Is the most current USDA/FNS "Justice for All" poster hung in a highly visible location that can be seen by students, faculty, and community people as they proceed through the tray line or where they receive their meal?	☐	☐	☐	
2. Are children eligible for free or reduced price meals allowed all the same choices as the paying children?	☐	☐	☐	
3. When using a name checklist in the lunchroom, is it coded in such a way that it is obvious to others which children are receiving free or reduced price meals (for example, color coding, symbols, numbers, obvious codes such as F,R,P; 1,2,3)?	☐	☐	☐	
4. When using a computer system for doing meal counts and cash transactions, does the system prevent overt identification? (for example, eligibility status does not show up on the screen)	☐	☐	☐	
5. Are multiple meal tickets available only to children eligible for free or reduced price meals?	☐	☐	☐	
6. Are single meal tickets available only to paid students?	☐	☐	☐	
7. Are accommodations made for students with physical disabilities so they can easily access the cafeteria and tray lines?	☐	☐	☐	
8. Does the SFA have policies and procedures for working with students needing special diets? (i.e., special diet request form completed by a physician and a resource such as a local dietician.)	☐	☐	☐	
Meal Patterns				
9. Is the food service staff planning and preparing meals according to the meal pattern indicated in the annual agreement? (for example, Traditional Menu Pattern, Enhanced Menu Pattern, Nutrient Standard Menu Pattern)	☐	☐	☐	
10. Does today's menu have all required menu components?	☐	☐	☐	
11. Are menus planned in advance to assure good use of commodities, foods on hand, adequate purchasing procedures?	☐	☐	☐	
12. Do the portion sizes appear to meet the minimum meal pattern requirements?	☐	☐	☐	
13. Is offer versus serve properly implemented? ☐ Elementary	☐	☐	☐	
☐ Middle School / Jr. High	☐	☐	☐	
☐ High School	☐	☐	☐	
Explain "NO" answers in comments section.				

REVIEW AREAS	YES	NO	N/A	COMMENTS
Point of Service Reimbursable Meal Count				
14. Are daily meals claimed based on morning classroom counts, or counts taken at any other location before the meals is served?	☐	☐	☐	
15. Are daily meals claimed based on attendance records?	☐	☐	☐	
16. Is the point of service and meal count person located at the end of the tray line?	☐	☐	☐	
17. If CANS has given approval to do meal counts at the beginning of the tray line, is there someone who is responsible at the end of the line to be sure each tray has all the required menu components?	☐	☐	☐	
18. Are meal counts based only on tray or plate counts?	☐	☐	☐	
19. Does the meal count person look at each tray to be sure students have selected the minimum number of menu components so their meal can be claimed for reimbursement?	☐	☐	☐	
20. Are any of the required menu components located in the lunch room after students go through the tray line that would be not considered extra items? (for example the milk cooler, salad bar, or specialty bar. All menu components must be available to students at point of service.)	☐	☐	☐	
Menu Production Records				
21. Is the food service staff completing a daily production record for each meal service? (for example, a breakfast menu record, a lunch menu record, a snack menu record)	☐	☐	☐	
22. If the SFA has an outside entity prepare the daily meals, is a daily production record provided?	☐	☐	☐	
23. Is the staff keeping daily production records in a safe location, such as a 3-ring binder, in date order?	☐	☐	☐	
24. Is the staff using an approved production record form appropriate for Traditional Menus, Enhanced Menus, or Nutrient Standard Menus? (See NSLP Memo #9A for prototype forms and instructions.)	☐	☐	☐	
25. If the food service is using a production record that is not one of the prototypes shown in NSLP Memo #9A, has it been approved for use by CANS?	☐	☐	☐	
26. Are all sections of the daily production record being completed daily? (for example, planned servings for each menu item and age group; planned portions for seconds, adults, and ala carte; quantities for leftovers or added foods; total number of student and adult meals.)	☐	☐	☐	
27. Is the most recent health/sanitation report posted in a highly visible location for students, staff or community people to read?	☐	☐	☐	
28. Have the errors that may have been cited on the last health inspection report been corrected?	☐	☐	☐	
29. Have errors that may have been cited on the last fire inspection report been corrected?	☐	☐	☐	
30. Does the food service manager/director/head cook have a written food safety plan that itemizes standard operating procedures?	☐	☐	☐	

REVIEW AREAS	YES	NO	N/A	COMMENTS
31. Is the kitchen staff completing food temperature logs for their refrigerator/cooler and freezer?	☐	☐	☐	
32. Are toxic or poisonous items stored away from food items?	☐	☐	☐	
33. Does the SFA have policies and procedures in place for: • Controlling keys to kitchen and storage areas?	☐	☐	☐	
• Keeping food supply safe and secure?	☐	☐	☐	
• When outside groups use the kitchen facilities?	☐	☐	☐	
• Controlling unauthorized people/traffic in kitchen area?	☐	☐	☐	
• Monitoring freezer temps during school breaks?	☐	☐	☐	
34. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)	☐	☐	☐	
35. Is first in, first out method of inventory rotation practiced? (FIFO)	☐	☐	☐	
36. Are all foods stored in facilities belonging to the local agency?	☐	☐	☐	
USDA Commodities				
37. Does the School Food Authority (SFA) receive commodities? If no, skip questions 37-44.	☐	☐	☐	
38. Does the food service staff have a perpetual inventory record of all USDA commodities that is up to date?	☐	☐	☐	
39. Is adequate space available for storage?	☐	☐	☐	
40. Is there an excess supply of any commodity product? (an amount of stock which would exceed a 6 month supply)	☐	☐	☐	
41. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)	☐	☐	☐	
42. Is first in, first out method of inventory rotation practiced? (FIFO)	☐	☐	☐	
43. Are all foods stored in facilities belonging to the local agency?	☐	☐	☐	
44. Do program personnel know the procedures for submitting claims for loss of USDA commodities?	☐	☐	☐	
Other				
45. Is space available for food service staff to complete and store records at the school? (No work papers of confidential nature should be worked on or kept at home.)	☐	☐	☐	
46. Are there any other food service program concerns that need to be addressed at this time? (Describe in comments section area.)	☐	☐	☐	

Corrective Action Plan: (Recommended Corrective Action for above "NO" answers**)**:

Follow-Up Visit: (Corrective Action taken by school and date implemented**):**

School Site Signature (Food Service Director or Manager)	Title	Date
School Food Authority Signature	Title	Date

On-Site Review Worksheet Assessment of the School Meal Count System SNP 228-1

Can be found here: currently being updated and replacing memo 52.1

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To: Authorized Representatives Child Nutrition Programs

From: Child and Adult Nutrition Services

Date: May 10, 2018

Subject: On-Site Review Worksheet Assessment of the School Meal Count System

Memo Number: SNP 228-1

This numbered memo supersedes the previous memo #52.1. All Child & Adult Nutrition Services memos are available on the Child & Adult Nutrition Services website.

Every school year, each School Food Authority (SFA) with more than one school must perform no less than one on-site review of the meal counting and claiming system and some general areas identified under 7 CFR 210.18(h) in each school operating the National School Lunch Program (NSLP) and half of the schools operating the School Breakfast Program (SBP).

Procurement Cover

Procurement Code of Conduct

Can be found here: doe.sd.gov/cans/documents/PrcPlnExmpl.docx

Procurement Terms

Can be found here: https://doe.sd.gov/cans/documents/ProcuremT.docx

This document is a sample and is not intended to be all inclusive. The School Food Authority is ultimately responsible to ensure that the plan complies with all Federal Regulations, State Procurement Code and Regulations and local procurement policies.

_____
Name of School Food Authority

PROCUREMENT PLAN
CHILD NUTRITION PROGRAM

This procurement plan contained on the following pages_____through_____will be implemented on _____from that date forward until amended. All procurements must adhere to free and open competition. Source documentation must be available to determine open competition, the reasonableness, the allowability and the allocation of costs.

_____ _____
Chairman, Board of Education Date

_____ _____
Superintendent of Schools Date

(Rev. 07-01-14)

(Name of School Food Authority)

PROCUREMENT PLAN

1. The (Name of School Food Authority) plan for procuring items for use in the Child Nutrition Program is as follows. The procurement plan provides for free and open competition, transparency in transactions, comparability, and documentation of all procurement activities.

2. If the amount of food purchases is more than the Federal small purchase threshold currently valued at $150,000, or if the amount of nonperishable goods and services is more than the State of South Dakota small purchase threshold currently valued at $25,000, or SFA approved threshold if less, formal procurement procedures will be used as required by state and federal Procurement Code and Regulations 7 CFR §3016.36 and South Dakota Codified Law (SDCL) 5-18A-14 and SDCL 5-18A-22(12). Informal procurement procedures (small purchase) will be required for purchases under the most restrictive small purchase threshold.

3. The following procedures will be used for all other purchases:

4. Formal bid procedures will be applied on the basis of:

Category	Procurement Method	Evaluation Used	Contract Award Type	Contract Duration/ Frequency
Frozen Foods (Meats, Fruits, Vegetables); Canned Foods (same as above); Bakery, Pasta, and Miscellaneous, Manual -ll Purpose Cleaning Supplies, Paper and Plastic Supplies	Formal	Bottom line	Fixed price	Bi-annual (August 1-January 31; February 1-June 15)
Fresh Fruits and Vegetables	Formal	Bottom line	Cost reimbursable Plus fixed-fee	Bi-annual, same as above
Dish machine Chemicals	Formal	Bottom line	Fixed price with price adjustment	August 1-June 15
Small wares	Formal	Bottom line	Fixed price	May/ annual
Fresh Bread	Formal	Bottom line	Fixed price with price adjustment	Annual by SY
Milk and Dairy	Formal	Bottom line	Fixed price with	Annual by SY

Products			price adjustment	
Office Supplies	District contract	Bottom line	Cost reimbursable plus fixed-fee	Annual July 1-June 30
Emergency	Informal	Bottom line	Fixed price	As needed
Equipment & Other Capital Expenditures**	Formal	Bottom line	Fixed price	May/annual
	** Check with State Agency for allowability of cost and possible preapproval requirements. See CANS memo SNP 241-1 or USDA Memo SP 39-2016 for more information			

2. Formal bid procedures will be applied on the basis of a:

   x Centralized System
   _____ Individual School
   _____ Multi-School Systems
   _____ State Contract
   _____ Combination of above (specify):

   _____
   _____

3. Because of the potential for purchasing more than $150,000 of food or $25,000 of goods and services, it will be the responsibility of (Title of person/position) to document the amounts to be purchased so the correct method of procurement will be followed.

B. When a formal procurement method is required, the following COMPETITIVE SEALED BID or an Invitation for Bid (IFB) or COMPETITIVE NEGOTIATION in the form of a Request for Proposal (RFP) procedures will apply:

- An announcement of an Invitation for Bid (IFB) or a Request for Proposal (RFP) will be placed in the (Newspaper/media, IPS Website, other internet source) to publicize the intent of the School Food Authority to purchase needed items. The advertisement for bids/proposals or legal notice will be run for (Length of Time).

- An advertisement is required for all purchases over the districts small purchase threshold of (actual amount of the SFA's small purchase threshold.) The announcement (advertisement or legal notice) will contain a:

  - general description of items to be purchased
  - deadline for submission of questions and the date written responses will be provided including addenda to bid specifications, terms and conditions as needed
  - date of pre-bid meeting, if provided, and if attendance is a requirement for bid award

- deadline for submission of sealed bids or proposals, and
- address of location where complete specifications and bid forms may be obtained.

- In an IFB or RFP, each vendor will be given an opportunity to bid on the same specifications.

- The developer of written specifications or descriptions for procurements will be prohibited from submitting bids or proposals for such products or services.

- The IFB or RFP will clearly define the purchase conditions. The following list includes requirements, not exclusive, to be addressed in the procurement document:

    - Contract period
    - SFA is responsible for all contracts awarded (statement)
    - Date, time, and location of bid opening
    - How vendor is to be informed of bid acceptance or rejection
    - Delivery schedule
    - Set forth requirements (terms and conditions) which bidder must fulfill in order for bid to be evaluated
    - Benefits to which the School Food Authority will be entitled if the contractor can not or will not perform as required
    - Statement assuring positive efforts will be made to involve minority and small business. 2 CFR 200.321
    - Statement regarding the return of purchase incentives, discounts, rebates, and credits to the School Food Authority's non-profit Child Nutrition account.7 CFR 210.21(f)(iv)
    - Contract provisions as required in 2 CFR 200.326 and Appendix II.
    - Contract provisions as required in 7 CFR Part 210.21(f) for all cost reimbursable contracts
    - Contract provisions as required in 7 CFR Part 210.16 for Food Service Management Company contracts
    - Procuring instrument to be used are purchase orders from firm fixed prices after formal bidding
    - Price adjustment clause (escalation/de-escalation) based on appropriate standard or cost index (Consumer price index, or other as stated in terms and conditions for pricing and price adjustments)
    - Method of evaluation and type of contract to be awarded
    - Method of award announcement and effective date (if intent to award is required by State or local procurement requirements)
    - Specific bid protest procedures including contact information of person and address and the date by which a written protest must be received
    - Provision requiring access by duly authorized representatives of the School Food Authority, State Agency, United State Department of Agriculture, or Comptroller General to any books, documents, papers and records of the contractor which are directly pertinent to all negotiated contracts
    - Method of shipment or delivery upon contract award

- Provision requiring contractor to maintain all required records for three years after final payment and all other pending matters (audits) are closed for all negotiated contracts
- Description of process for enabling vendors to receive or pick up orders upon contract award
- Signed statement of integrity (non-collusion)
- Signed Debarment/Suspension Certificate or statement included in contract or copy of Excluded Parties List System (EPLS).
- Provision allowing Market Basket Analysis or modifications of contracted product lists to acquire additional goods or increase quantities of listed goods as outlined in USDA memo SP04-2018, FD144-2018, SFSP 01-2018, CACFP 04-2018).
- Provision requiring "Buy American" as outlined in 7 CFR Part 210.21(d); specific instructions for prior approval of all of non-domestic product(s).
- Provision identifying if purchasing government surplus would be considered and what the procurement process for these purchases would be 2 CFR 200.318(f).
- Description of process used to ensure no unnecessary purchasing of duplicate goods or services 2 CFR 200.318(d)
- Procedures for geographic preference that are not so restrictive as to limit competition 7 CFR 210.21(g) and USDA Memo SP 03-2013, CACFP 02-2013 and SFSP 02-2013.
- Bid openings for SFSP only –Procedures for notifying the State Agency of the time and place of the bid opening, with a minimum of 14 days advance notice. 7CFR 225.15(m)(4)(iii).
- Description of the monitoring process used to ensure that contractors perform according to terms, conditions, and specifications of the contract are followed 2 CFR 200.318(i).

- Specifications and estimated quantities of products and services prepared by SFA and provided to potential contractors desiring to submit bids/proposals for the products or services requested.
- If any potential vendor is in doubt as to the true meaning of specifications or purchase conditions, interpretation will be provided in writing to all potential bidders by (Title of person/position) and date specified.
- The (Title of person/position) will be responsible for securing all bids or proposals.
- The (Title of person/position)will be responsible to ensure all SFA procurements are conducted in compliance with applicable Federal, State, and local procurement regulations.
- The following criteria will be used in awarding contracts as a result of bids/proposals.
  i. Price _____
  ii. _____ (Ex.: quality, delivery, service, etc.)
  iii. _____

In awarding a competitive negotiation (RFP), a set of award criterion in the form of a weighted evaluation sheet will be provided to each bidder in the initial bid document materials. Price alone is not the sole basis for award,

but remains the primary consideration when awarding a contract. Following evaluation and negotiations a firm fixed price or cost reimbursable contract is awarded.

- The contracts will be awarded to the responsible bidder/proposer whose bid or proposal is responsive to the invitation and is most advantageous to the SFA, price, and other factors considered. Any and all bids or proposals may be rejected in accordance with law.
- (Title of person/position) is required to sign on the bid tabulation of competitive sealed bids or the evaluation criterion score sheet of competitive proposals signifying a review and approval of the selections.
- (Title of person/position) reviewing the procurement system to ensure compliance with applicable laws.
- (Title of person/position) responsible for documentation the actual product specified is received.
- Any time an accepted item is not available, the (Title of person/position)will select the acceptable alternate. The contractor must inform (Title of person/position) (time/by when) a product is not available. In the event a non-domestic agricultural product is to be provided to the SFA, the contractor must obtain, in advance, the written approval of the product. The (Title of person/position) must comply with the Buy American Provision.
- Full documentation as to the reason an accepted item was unavailable, and to the procedure used in determining acceptable alternates, will be available for audit and review. The person responsible for this documentation is (Title of person/position).
- The (Title of person/position) responsible for maintaining all procurement documentation.

C. If the amount of purchases for items is less than the district's small purchase threshold, the following, SMALL PURCHASE PROCEDURES, including quotes, will be used. Quotes from an adequate number of qualified sources will be required.

1. Written Specifications will be prepared and provided to the vendor.

2. Each vendor will be contacted and given an opportunity to provide a price quote on the same specifications. A minimum of two vendors shall be contacted.

3. The (Title of person/position) will be responsible for contacting potential vendors when price quotes are needed.

4. The price quotes will receive appropriate confidentiality before award.

5. Quotes will be awarded by (Title of person/position). Quotes awarded will be to the lowest and best quote based upon quality, service availability, price, and/or_____.

6. The (Title of person/position) will be responsible for documentation of records to show selection of vendor, reasons for selection, names of all vendors contacted, price quotes from each vendor, and written specifications.

7. The (Title of Person) will be responsible for documentation that the actual product specified is received.

8. Any time an accepted item is not available, the (Title of person/position) will select the acceptable alternate. Full documentation will be made available as to the selection of the acceptable item.

9. Bids will be awarded on the following criteria:

   a. Price (Ex.: quality, delivery, service, etc.)
   b. _____
   c. _____

10. The (Title of person/position) is required to sign all quote tabulations, signifying a review and approval of the selections.

D. If items are available only from a single source when the award of a contract is not feasible under small purchase, sealed bid or competitive negotiation, NON-COMPETITIVE NEGOTIATION procedures will be used:

1. Request for sole source purchasing will be made to the State Agency, Child and Adult Nutrition Services.

2. Written Specifications will be prepared and provided to the vendor.

3. The (Title of person/position) will be responsible for the documentation of records to fully explain the decision to use the non-competitive negotiation. The records will be available for audit and review.

4. The (Title of person/position) will be responsible for documentation that the actual product or service specified was received.

5. The (Title of person/position) will be responsible for reviewing the procedures to be certain all requirements for using single source or non-competitive negotiation are met.

D. Non-competitive negotiations shall be used for one-time purchases of a new food item in order to determine food acceptance by students and for samples for testing purposes. A record of non-competitive negotiation purchase shall be maintained by the (School Food Authority Official. The record of non-competitive purchases shall include, at a minimum, the following:

- item name
- dollar amount
- vendor, and
- reason for non-competitive procurement

A member or representative of the local Board of Education or Governing Board will approve, in advance, all procurements that result from non-competitive negotiations.

E. Miscellaneous Provisions:

1. New product evaluation procedures will include:

   - _____
   - _____
   - _____

2. The School Food Authority agrees that the reviewing official of each transaction will be the (Title of person/position).

3. Payment will be made to the vendor when the contract has been met and verified and has met the SFA's procedures for payment. (If prompt payment is made, discounts, etc. are accepted.)

4. Specifications will be updated as need.

5. If product is not as specified, the following procedure will take place:

   - _____
   - _____
   - _____

F. Emergency or "Pressing Need" Purchases

1). If it is necessary to make a one-time emergency procurement to continue service or obtain goods, the purchase shall be made, and a log of all such purchases shall be maintained by the (School Food Authority Official). The following emergency procedures shall be followed. All emergency procurements shall be approved by the (School Food Authority Official). At a minimum, the following emergency procurement procedures shall be documented:

- item name
- dollar amount
- vendor, and
- reason for emergency

2). If it is necessary, in the course of a pressing need, to make an emergency purchase by means of "piggybacking" on the bid of another district, the following conditions must exist and approved procedures must be followed and appropriately documented as follows:

- The SFA originating the competitive procurement must have a "piggyback provision" in the original solicitation;
- Documentation of the emergency requiring the piggybacking must be maintained;
- Approval from the purchasing SFA's governing board will be obtained and documented;
- Approval from the SFA that originated the competitive procurement will be obtained and documented;

- Approval from the Vendor that was awarded the Contract (original solicitation) will be obtained and documented;
- If required, a public notice of the district's "Intent to Waive Competitive Bidding" will be issued at least 10 days prior to the regularly scheduled governing board meeting;
- Approval to piggyback will be obtained and documented from the governing board during a regularly scheduled meeting following the public notice;
- Notification to the Vendor of final approval will be documented and issued;
- A contract with the Vendor will be developed including:
    i. The contractor shall agree to retain all books, records and other documents relative to the contract agreement for three (3) years after final payment, or until audited by SFA, whichever is sooner. The SFA, its authorized agents, and/or State and/or USDA auditors shall have full access to and the right to examine any of said materials during said period.

3). The SFA shall agree to retain all books, records and other documents relative to the award of the contract for three (3) years after final payment. Specifically the SFA shall maintain, at a minimum, the following documents:

- Written rationale for the method of procurement;
- A copy of the original solicitation;
- The selection of contract type;
- The bidding and negotiation history and working papers;
- The basis for contractor selection;
- Approval from the State agency to support a lack of competition when competitive bids or offers are not obtained;
- The basis for award cost or price;
- The terms and conditions of the contract;
- Any changes to the contract and negotiation history;
- Billing and payment records;
- A history of any contractor claims; and
- A history of any contractor breaches.

G. The following conduct will be expected of all persons who are engaged in the awarding and administration of contracts supported by School Food and Nutrition Program Funds. These written standards of conduct include:

1. No employee, officer or agent of the (School Food Authority) 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 one of the following has a financial or other interest in the firm selected for the award:

   a. The employee, officer or agent;
   b. Any member of the immediate family;
   c. His or her partner;

d. An organization which employs or is about to employ one of the above.

2. The (School Food Authority) employees, officers or agents shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements.

3. Penalties for violation of the standards of code of conduct of the (School Food Authority) School Child Nutrition Program should be:

   a. Reprimand by Board of Education;
   b. Dismissal by Board of Education;
   c. Any legal action necessary.

Other State or local procurement requirements that may be required.

Procurement Code of Conduct

Can be found here: doe.sd.gov/cans/documents/PrcPlnExmpl.docx

This document is a sample and is not intended to be all inclusive. The School Food Authority is ultimately responsible to ensure that the plan complies with all Federal Regulations, State Procurement Code and Regulations and local procurement policies.

_____
Name of School Food Authority

PROCUREMENT PLAN
CHILD NUTRITION PROGRAM

This procurement plan contained on the following pages _____ through _____ will be implemented on _____ from that date forward until amended. All procurements must adhere to free and open competition. Source documentation must be available to determine open competition, the reasonableness, the allowability and the allocation of costs.

_____ _____
Chairman, Board of Education Date

_____ _____
Superintendent of Schools Date

(Rev. 07-01-14)

Procurement Terms

Can be found here: https://doe.sd.gov/cans/documents/ProcuremT.docx

Procurement Terms in Plain English

Government Term	English 'Translation'	More Information
Acquisition	Purchase or Buy	This is just a fancy term for when you actually make the purchase or buy something.
Advantageous	Helpful	Advantageous in this case just means that it is profitable (or beneficial) for your agency.
Affirmative Action Steps	---	Affirmative Action steps are management tools designed to make sure that all parties have an equal chance.
Aggregate	Total	Aggregate means the total amount spent at one time or the total dollar amount of a contract.
Arbitrary	Not reasonable or not responsible	This is really just getting at the issue that the items in the contract must be reasonable and logical. A person with common sense would spend his or her own money on the items. Arbitrary might also mean uninformed. You don't make an "arbitrary" decision about what should be included in the contract. You would group like things together. For example, you would not arbitrarily decide to put toys on the same contract as supplies and food stuff for the kitchen.
Bidder	Interested Company or Business	A bidder is a company or business in your area (or that serves your area) that might be interested in providing the items that you need.

Procurement Terms in Plain English

Government Term	English 'Translation'	More Information
Acquisition	Purchase or Buy	This is just a fancy term for when you actually make the purchase or buy something.
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Bidder	Interested Company or Business	A bidder is a company or business in your area (or that serves your area) that might be interested in providing the items that you need.
Bonded	Insured	Being bonded means that an insurance company has secured money that is available to the buyer in the event they you need to file a claim against the company. The money is in the control of the state, a bond, and not under the control of the 'bonded' company.
Conducting	Doing	Conducting simply put means doing or completing a task.

Government Term	English 'Translation'	More Information
Conflict of Interest	---	Any action, position, relationship, etc. that allows a person to benefit at the expense of public interest or their employer.
Cost Reimbursable Contract	---	A cost reimbursable contract is a contract that gives payments to the company based on the allowable costs that the company has to pay for the items they are selling to you the buyer. Sometimes the bills are paid by the agency instead of by the company and reimbursed by the agency.
Economically Feasible	Can I afford it?	This means that the contract meets your needs both your needs both in terms of the dollar amount and your agency's needs.
Entity	A business or company.	In this case, entity would mean a business, agency, school district, unit of government, or company.
Equitably	Honestly or Without Favor	This means that you must be fair about the purchase. It could mean that you apply the details of your contract in a fair manner for all possible companies or that you spend your money equally (for small purchase) between all different stores in your area.
Exigency	Emergency or necessity	An exigency is simply an emergency when you may not be able to follow the contract requirements for a variety of reasons as outlined in their guidance.
Fixed Price Contract	---	A fixed price contract provides a stated price that is fixed (or in place) without any upward or downward adjustment for the duration of the contract, including all renewal periods. Some fixed price contracts may include the option to adjust the costs based on a standard Consumer Price Index to allow for increases or decreases in prices over the contract period.

Government Term	English 'Translation'	More Information
IFB	Invitation for Bid	An invitation for bid is a formal way of getting quotes from sellers. This process is used when the agency can easily identify the details. The use of this method requires the agency to decide which seller to use based only on the lowest price. An agency is not allowed to negotiate with the seller on the price quotes.
Inadequate	Not Enough or Not Good Enough	This can be related to the way you write the details of what you need or it can be related to a company that wants to supply the product for you.
Incurred	Be Subject To	Incurred means the amount your agency is subject to get (or to pay).
Modification	Change	A modification is simply a change that is made to the contract.
Overly Restrictive	Too Many Rules	This means that you cannot write the details of your needs with so many rules that only one company can respond to your request or invitation to bid.
Pass Through Entity	Middle man	In this case, a pass through entity is an agency that the goods or services would go through between the owner and the buyer. An example might be a group purchasing company that handles the contracts, ordering, etc. for the food service operation of a group of agencies.
Practicable	Something that can be done (doable)	You will hear this word in sentences "to the extent practicable" a lot. This just means that as much as it is something that is possible to do.
Procurement	Purchasing	This term is used when talking about purchases that you make using taxpayer dollars.
Quotation	Price	A quotation is the information that you will receive from an interested company about the price they will offer to your agency.

Government Term	English 'Translation'	More Information
Responsible	---	Responsible in this situation means that the seller can and will do what the contract requires. It also outlines who will do each job duty. For example, a food service worker is responsible to prepare meals. A seller (or vendor) is responsible to provide food according to what is ordered.
Responsive	---	Responsive means that the product/service meets the specifications (details).
RFP	Request for Proposal	A Request for Proposal is more complicated than an Invitation for Bid (see information above), but gives the agency more options to compare than just the price. It also allows that agency to work with the sellers (negotiate) on the terms and/or the price after the evaluation process has ended.
Scope	Range	In this case, it is a summary of your needs for purchasing.
Scope of Contract	---	This is referring to all of the needs of your agency that need to be in the contract.
Solicitation	Asking	Solicitation is asking companies if they would be interested in entering into a specific contract with your facility based on the details in your Invitation for Bid or Request for Proposal.
Specifications (Specs)	Details	Specifications (Specs) are the details that you want for each item that you need to purchase.
Standard (or Cost) Index	A Guide or Basis for Change	A standard index (or cost index) is a price adjustment based on increases or decreases in labor or material costs that are specifically identified in a fixed price contract. The meal reimbursement rates each year change according to a certain Consumer Price Index.
Threshold	Edge	Threshold in this situation is simply the dollar amount that divides the requirements for the level of purchasing rules (formal, informal, micro purchasing) that you need to follow.

Government Term	English 'Translation'	More Information
Vendor	Seller	A vendor is any company that sells that product(s) that you are looking to buy.
Weighted Scoring	---	Weighted Scoring is when you can use other details to make a decision about buying something. For example, you can consider the quality of the product/service, references/reviews, etc. in addition to the cost of the product/service.

ABC School District Food Service Department

Policy Name: Written Code of Standards of Conduct

Regulations: 2 CFR Part 200.318, formerly 7 CFR Part 3016.36(b)(3), State Procurement Code and Regulations, and ABC School District Department of Purchasing.

Procedures: The ABC School District seeks to conduct all procurement procedures:

- in compliance with stated regulations; and
- to prohibit conflicts of interest and actions of employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal, State, or local award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.

The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.

ABC School district procedures seek to avoid acquisition of unnecessary or duplicative items. Consideration is given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made to determine the most economical approach.

For questions and concerns regarding procurement solicitations, contract evaluation, and award, contact:

Purchasing Contacts:	Director of Purchasing	123.456.7890
	Director of School Food Service	123.456.7880

Conflict of Interest Value

Nonprogram Foods Cover

Nonprogram Food Decision Tree

Can be found here: https://doe.sd.gov/cans/documents/19-Nonprogram-Tree.xlsx

Nonprogram Food Revenue Tool

Can be found here: http://doe.sd.gov/cans/documents/NonproRev.xls

Nonprogram Food DecisionTree

Can be found here: https://doe.sd.gov/cans/documents/19-Nonprogram-Tree.xlsx

Nonprogram Foods Decision Tree

WHAT KIND OF NONPROGRAM FOODS AND/OR BEVERAGES DO YOU HAVE? Please check "yes" for all Nonprogram Foods offered in your School Nutrition Program. Responses to these questions will determine if you must complete the Nonprogram Food Revenue Tool.

Nonprogram foods are foods that are paid for using your reimbursement dollars (this is also known as your restricted Nonprofit School Food Service Account). Foods that are purchased by another department or student group are not included as a nonprogram food.

Please select YES or NO for each item below:	
1. Adult Meals: meals that are sold or given to teachers, parents, visitors, etc.	SELECT VALUE
a) My adult meal price meets the adult meal price requirement	SELECT VALUE
2. Second Milks: milk sold to students who bring a lunch from home, second milks in the line	SELECT VALUE
a) I charge more than I pay for second milks	SELECT VALUE

Nonprogram Foods Decision Tree

WHAT KIND OF NONPROGRAM FOODS AND/OR BEVERAGES DO YOU HAVE? Please check "yes" for all Nonprogram Foods offered in your School Nutrition Program. Responses to these questions will determine if you must complete the Nonprogram Food Revenue Tool.

Nonprogram foods are foods that are paid for using your reimbursement dollars (this is also known as your restricted Nonprofit School Food Service Account). Foods that are purchased by another department or student group are not included as a nonprogram food.

Please select YES or NO for each item below:	
1. Adult Meals: meals that are sold or given to teachers, parents, visitors, etc.	SELECT VALUE
a) My adult meal price meets the adult meal price requirement	SELECT VALUE
2. Second Milks: milk sold to students who bring a lunch from home, second milks in the line	SELECT VALUE
a) I charge more than I pay for second milks	SELECT VALUE
3. A-la-carte: 2nd entrees or meals that are sold or given to students, Smart Snacks that are sold, including beverages	SELECT VALUE
4. Afterschool snacks, suppers, weekend meals, etc. that are not claimed for reimbursement and paid for using the Foodservice Account	SELECT VALUE
5. Meals/food and beverages supplied to another school district. These meals are not being claimed for reimbursement by the school supplying the food or program (e.g. Head Start)	SELECT VALUE
6. Catering: food provided for Teacher Appreciation Day, meals for sports banquets, food items provided for outside organizations	SELECT VALUE

7. Food and/or beverages via vending machines	SELECT VALUE
8. Fundraisers when the SFA supplies products for school-based fundraisers	SELECT VALUE
9. School Stores (e.g. Smart Snack compliant chips, coffee)	SELECT VALUE

You do not need to complete the USDA Nonprogram Food Revenue Tool

If you do not need to complete the USDA Nonprogram Revenue Tool, please attach this document (Nonprogram Foods Decision Tree) to your iCAN SNP Application Checklist item: "Nonprogram Food Revenue Tool"

If you must complete the USDA Nonprogram Food Revenue Tool, please attach this document (Nonprogram Foods Decision Tree) AND your completed USDA Nonprogram Food Revenue Tool to your iCAN SNP Application Checklist Item: "Nonprogram Food Revenue Tool".

The Nonprogram Food Revenue Tool, along with other helpful items to assist you in completing the tool can be found on the CANS NSLP Website under the School Meal Programs Requirement → Nonprogram Foods

Visit the CANS NSLP Webiste by Clicking Here

April 2018

Nonprogram Food Revenue Tool

Can be found here: http://doe.sd.gov/cans/documents/NonproRev.xls

USDA FOOD AND NUTRITION SERVICE

Nonprogram Revenue Calculator		
Enter the cost for reimbursable meal, cost of nonprogram food and total revenue		
Cost for Reimbursable Meal Food		
Cost of Nonprogram Food		
Total Food Costs	$ -	
Total Nonprogram Food Revenue		
Total Revenue		
Minimum portion of revenue from nonprogram funds	0%	
Minimum Revenue Required from the Sale of Nonprogram Foods	$ -	
Additional Revenue Needed to Comply	$ -	

Unpaid Meal Charges Cover

Local Meal Charge Policy Considerations for all SFAs

Can be found here: http://doe.sd.gov/cans/documents/UP-Checklist.pdf

Local Meal Charge Policy Communication Requirements

Can be found here: http://doe.sd.gov/cans/documents/Comm-Checklist.pdf

Alternate Meal Policy Considerations

Can be found here: http://doe.sd.gov/cans/documents/AltMealPolicy.pdf

Topics for Delinquent/Bad Debt Policies

Can be found here: http://doe.sd.gov/cans/documents/DebtPolicies-16.pdf

Example: School District Meal Charge

Can be found here: http://doe.sd.gov/cans/documents/UP-ChargesPolicy-%20Example.pdf

Link to Unpaid Meal Charges USDA FNS website:

Can be found here: https://www.fns.usda.gov/school-meals/unpaid-meal-charges

Local Meal Charge Policy Considerations for All SFAs

Can be found here: http://doe.sd.gov/cans/documents/UP-Checklist.pdf

Local Meal Charge Policy Considerations for All SFAs		
As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have a written meal charge policy. An SFA may have a consistent policy for all students in the school district or choose to apply the policy differently based on student grade level. ***For each entity or grade level that has a different policy, FNS encourages SFAs to explain in the policy:***		
1. Are students unable to pay for their meal at the time of the meal service allowed to charge a meal?	☐ Yes ☐ No	*If yes, which meals may be charged?* ☐ Breakfast ☐ Lunch ☐ Afterschool Snacks
2. If students are allowed to charge a meal, is there a limit to the number of charges or dollar limit allowed before requiring payment of the debt?	☐ Yes ☐ No ☐ N/A	*If yes, what is the number or dollar amount for the charge limit(s)?* _____
3. If students are allowed to a charge meal, will they receive reimbursable or alternate meals?	☐ Reimbursable ☐ Alternate ☐ N/A	*If students will receive an alternate meal, what will the meal contain? (Include all meals that apply.)* • *Breakfast:* _____ _____ • *Lunch:* _____ _____ • *Afterschool Snacks:* _____ _____
4. If students are allowed to charge a meal, will they have limitations on the foods they may select for a	☐ Yes ☐ No ☐ N/A	*If yes, what are the limitations?* _____ _____ _____

Local Meal Charge Policy Considerations for All SFAs

As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have a written meal charge policy. An SFA may have a consistent policy for all students in the school district or choose to apply the policy differently based on student grade level.

For each entity or grade level that has a different policy, FNS encourages SFAs to explain in the policy:

1. Are students unable to pay for their meal at the time of the meal service allowed to charge a meal?	☐ Yes ☐ No	*If yes, which meals may be charged?* ☐ Breakfast ☐ Lunch ☐ Afterschool Snacks
2. If students are allowed to charge a meal, is there a limit to the number of charges or dollar limit allowed before requiring payment of the debt?	☐ Yes ☐ No ☐ N/A	*If yes, what is the number or dollar amount for the charge limit(s)?* _____
3. If students are allowed to a charge meal, will they receive reimbursable or alternate meals?	☐ Reimbursable ☐ Alternate ☐ N/A	*If students will receive an alternate meal, what will the meal contain? (Include all meals that apply.)* • *Breakfast:* _____ _____ • *Lunch:* _____ _____ • *Afterschool Snacks:* _____ _____
4. If students are allowed to charge a meal, will they have limitations on the foods they may select for a reimbursable meal?	☐ Yes ☐ No ☐ N/A	*If yes, what are the limitations?* _____ _____ _____

5. Where can families find assistance with applying for free or reduced price school meals?	*Information for families:* _____ _____ *Contact information for an SFA or school official:* • *Name:* _____ • *Phone:* _____
6. How will the SFA notify households of low or negative balances?	*Low balance notification policy:* _____ _____ *Negative balance notification policy:* _____ _____
7. What resources are available to assist families with paying for their children's meals or debt?	*List of resources for families (i.e., repayment plans):* _____ _____ _____
8. How will delinquent meal charges be managed by the SFA?	*Delinquent charges management policy:* _____ _____ _____
9. Which office or personnel will be responsible for managing the charges?	*Contact information for SFA or school official:* • *Name/Office:* _____ • *Phone:* _____
10. What are the consequences for families that fail to repay a debt?	*Consequences for families:* _____ _____

Local Meal Charge Policy Communication Requirements

Can be found here: http://doe.sd.gov/cans/documents/Comm-Checklist.pdf

Local Meal Charge Policy Communication Requirements for All SFAs		
As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have in place a written meal charge policy, and to communicate that policy to families and school and/or district-level staff members, as appropriate. ***On an annual basis, SFAs must ensure the policy is communicated as required, and may use the following questions as a guide:***		
1. Have all families received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated:* _____
2. Have all families of transfer students received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated:* _____
3. Have all school and/or district-level staff members responsible for policy enforcement received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated to staff members (i.e., during annual training) and which staff members are included:* _____
4. Is there a system in place to notify families of the meal charge policy when sending the initial notification of delinquent debt?	☐ Yes ☐ No	*Describe how families are reminded of the policy when the notification is sent:* _____
5. Do schools share information about the policy in other communications with families?	☐ Yes ☐ No	*Explain any other ways families are informed of the policy (i.e., student handbooks and/or in online portals households use to access student accounts):* _____

Local Meal Charge Policy Communication Requirements for All SFAs

As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have in place a written meal charge policy, and to communicate that policy to families and school and/or district-level staff members, as appropriate.

On an annual basis, SFAs must ensure the policy is communicated as required, and may use the following questions as a guide:

1. Have all families received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated:* _____
2. Have all families of transfer students received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated:* _____
3. Have all school and/or district-level staff members responsible for policy enforcement received a written copy of the meal charge policy?	☐ Yes ☐ No	*Describe how the policy is communicated to staff members (i.e., during annual training) and which staff members are included:* _____
4. Is there a system in place to notify families of the meal charge policy when sending the initial notification of delinquent debt?	☐ Yes ☐ No	*Describe how families are reminded of the policy when the notification is sent:* _____
5. Do schools share information about the policy in other communications with families?	☐ Yes ☐ No	*Explain any other ways families are informed of the policy (i.e., student handbooks and/or in online portals households use to access student accounts):* _____

Alternate Meal Policy Considerations for SFAs Opting to Provide Alternate Meals

SFAs are not required to provide alternate meals to children with unpaid meal charges. As provided in SP 46-2016, SFAs opting to provide alternate meals should include information about alternate meals in their local meal charge policy.

For each entity or grade level that has a different alternate meal policy, FNS encourages SFAs to explain in the policy:

1. Which meal service(s) offer alternate meals?	☐ Breakfast ☐ Lunch ☐ Afterschool Snacks	
2. How long will alternate meals be provided?	*Duration of the provision of alternate meals:*_____	
3. Are students required to pay for alternate meals?	☐ Yes ☐ No	*If students must pay for the alternate, what is the cost? (Include all meals that apply.)* • *Breakfast: $*_____ • *Lunch: $*_____ • *Afterschool Snacks: $*
4. When are alternate meals offered?	*Explain when meals are provided (i.e., immediately in lieu of charging, or after a child's negative balance dips to a certain level):* _____ _____ _____ _____	
5. How are alternate meals presented?	*Explain how alternate meals are presented (i.e., a sack lunch or a low-cost reimbursable entrée regularly included on the menu):* _____ _____ _____ _____	

Alternate Meal Policy Considerations

Can be found here: http://doe.sd.gov/cans/documents/AltMealPolicy.pdf

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3. Are students required to pay for alternate meals?	☐ Yes ☐ No	*If students must pay for the alternate, what is the cost? (Include all meals that apply.)* • *Breakfast: $*_____ • *Lunch: $*_____ • *Afterschool Snacks: $*
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5. How are alternate meals presented?	*Explain how alternate meals are presented (i.e., a sack lunch or a low-cost reimbursable entrée regularly included on the menu):* _____ _____ _____ _____	

Topics for Delinquent/Bad Debt Policies

Can be found here: http://doe.sd.gov/cans/documents/DebtPolicies-16.pdf

Recommended Topics for Delinquent/Bad Debt Policies for SFAs		
As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have in place a written meal charge policy. Within that required policy, FNS recommends SFAs explain the collection methods the SFA will use and the conditions under which each will be initiated. ***Specific topics recommended by FNS include the following:***		
1. How many days will a household's debt be delinquent before the SFA requests payment?	*Number of Days:* _____	
2. What procedures are in place for determining if children with delinquent meal charges are eligible for free or reduced price meal benefits?	*Provide examples (i.e., encouraging the child's household to submit an application):* _____ _____	
3. How will households be notified of unpaid meal charges, expected payment dates, and collection efforts?	*Describe household notification strategies:* _____ _____	
4. How will repayment plans, with payment levels and due dates appropriate to a household's particular circumstances, be established?	*Describe establishment of repayment plans, including any key considerations (i.e., a job loss in the household):* _____ _____	
5. Will children with a small number of charges, in terms of dollars, be permitted to accumulate a larger debt before the SFA pursues recovery?	☐ Yes ☐ No	*If so, what is the threshold?* _____ _____

Recommended Topics for Delinquent/Bad Debt Policies for SFAs

As provided in SP 46-2016, no later than July 1, 2017, all SFAs operating the Federal school meal programs are required to have in place a written meal charge policy. Within that required policy, FNS recommends SFAs explain the collection methods the SFA will use and the conditions under which each will be initiated.

Specific topics recommended by FNS include the following:

1. How many days will a household's debt be delinquent before the SFA requests payment?	*Number of Days:* _____	
2. What procedures are in place for determining if children with delinquent meal charges are eligible for free or reduced price meal benefits?	*Provide examples (i.e., encouraging the child's household to submit an application):* _____ _____	
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4. How will repayment plans, with payment levels and due dates appropriate to a household's particular circumstances, be established?	*Describe establishment of repayment plans, including any key considerations (i.e., a job loss in the household):* _____ _____	
5. Will children with a small number of charges, in terms of dollars, be permitted to accumulate a larger debt before the SFA pursues recovery?	☐ Yes ☐ No	*If so, what is the threshold?* _____ _____
6. What efforts will be made to collect household debt?	*Describe debt collection efforts:* _____ _____	

7. Who will initiate household debt collection procedures?	*Explain who is responsible for initiating collection procedures (e.g., food service manager, school principal, superintendent's office, etc.):* _____ _____ _____	
8. Who will determine whether the achievement of program purposes would be jeopardized by the diversions of staff time and effort to collect payment?	*Explain who is responsible for assessing debt collection efforts (e.g., food service manager, school principal, superintendent's office, etc.):* _____ _____ _____	
9. Is there a cumulative dollar threshold beyond which the SFA will escalate the collection method?	☐ Yes ☐ No	*If so, what is the threshold?* _____ _____
10. How will funds be obtained to restore the unallowable bad debt to the NSFSA?	*Explain from where funds to restore the NSFSA will be obtained:* _____ _____ _____	

Example

Canbefoundhere:http://doe.sd.gov/cans/documents/UP-ChargesPolicy-%20Example.pdf

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Date Issued _____

Effective Date _____

Example School District Meal Charge Policy

Instructions for Prototype School District Meal Charge Policy:

This prototype is designed to give you an example to meet minimum unpaid meal charge requirements. This example policy does not cover the entirety of possible unpaid meal charge policies. Please reference the USDA's *Overcoming the Unpaid Meal Challenge* guidebook for a more comprehensive guidance tool. The text in red includes some common practices that may occur in some schools.

I. Federal Requirement

The purpose of this policy is to address the need for school food authorities (SFAs) participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) to institute and clearly communicate a meal charge policy, which would include, if applicable, the availability of alternate meals. Because all students in participating schools may receive reimbursable school meals, all SFAs must have a policy in place for children who are participating at the reduced price or paid rate, but either do not have money in their account or in hand to cover the cost of the meal at the time of service. Such a policy ensures that school food service professionals, school administrators, families, and students have a shared understanding of expectations in these situations.

This requirement is referred to a "policy," but whether this is referred to as a "policy" or "standard practice" is at the discretion of the SFA. Regardless of terminology is used, the policy or standard practice must consist of a written document explaining how the SFA will handle situations where children eligible to receive reduced price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service. The policy or standard practice must be implemented throughout the SFA.

You can find more information about this US Department of Agriculture (USDA) Food and Nutrition Service (FNS) requirement at: https://www.fns.usda.gov/school-meals/unpaid-meal-charges.

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You can find more information about this US Department of Agriculture (USDA) Food and Nutrition Service (FNS) requirement at: https://www.fns.usda.gov/school-meals/unpaid-meal-charges.

II. PURPOSE OF POLICY:

The purpose of this policy is to establish consistent meal account procedures throughout the district. Unpaid charges place a financial strain on the food service department. The goals of this standard of practice are:

- To treat all students with dignity in the serving line regarding meal accounts
- To support positive situations with district staff, district business policies, student and parent/guardian to the maximum extent possible
- To establish policies that are age appropriate
- To encourage parent/guardian to assume the responsibility of meal payments and to promote self-responsibility of the student
- To establish a consistent district policy regarding charges and collection of charges

III. SCOPE OF RESPONSIBILITY:

- The food service department, Business Manager, Administrative Assistant (or name another position responsible for this position): Responsible for maintaining charge records and notifying the student's parent/guardian.

- The Parent/Guardian: Immediate payment

IV. ADMINISTRATION

1. Families are encouraged to apply for free and reduced price meal benefit. Any family that falls into a negative balance will receive a written notification to encourage them to apply for free or reduced price meal benefits.

2. Families are encouraged to pre-pay for meals and money is accepted in the school office daily for payments on the day of service. Written notification of prepayment options occurs at the beginning of each school year, is given to each new transfer student, is posted on the Food Service website, and is included in the student handbook.

3. Families will be notified of the school Unpaid Meal Charge Policy in writing before the school year begins and with each new transfer student. This policy will also be posted on the Food Service Website.

4. (Optional) SFAs may limit the amount of funds that a student can use daily for a la carte purchases. (Insert a statement about families are notified of this option and how a family can select this option).

5. **Elementary students:** (Insert a statement of how notices will be sent to parent/guardian. For example, overdue slips will be attached to the student's ID cards and sent to the student's classroom to be handed out to the student by the teacher.)

a. Calls on delinquent accounts are made on a daily basis to try to collect payment.
b. All delinquent accounts at the beginning of May of the current school year will be subject to collections for payment.
c. If a child has money to purchase a reduced price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay previously unpaid charges if the child intended to use the money to purchase that day's meal.

6. **Middle School students**: (Insert a statement of how notices will be sent to parent/guardian. For example, overdue slips will be sent home with students whose accounts are a low or negative balance.)
    a. Calls on delinquent accounts are made on a daily basis to try to collect payment.
    b. No charges are allowed for extras or a la carte foods on any negative accounts or accounts with a zero balance.
    c. All delinquent accounts at the beginning of May of the current school year will be subject to collections for payment.
    d. If a child has money to purchase a reduced price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay previously unpaid charges if the child intended to use the money to purchase that day's meal.

7. **High School students:** (Insert a statement of how notices will be sent to parent/guardian. For example, food service workers will inform students of delinquent accounts in the checkout line.)
    a. Calls on delinquent accounts are made on a daily basis to try to collect payment.
    b. No charges are allowed for extras or a la carte food on any negative account or accounts with a zero balance.
    c. No charging allowed for any high school student beginning April until the end of the year.
    d. All delinquent accounts at the beginning of May of the current school year will be subject to collections for payment.
    e. If a child has money to purchase a reduced price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay previously unpaid charges if the child intended to use the money to purchase that day's meal.

8. (Optional policies) Denying meals or providing alternate meals. Describe when and how this is done in a manner that prevents embarrassment to the child in the meal service line.
    a. If an alternate meal is served that meets meal pattern requirement, those meals may be claimed for reimbursement. If an alternate meal is served that <u>does not</u>

meet meal pattern requirements, those meals may not be claimed for reimbursement and the food used for alternate meals must come from funds outside the non-profit school foodservice account.

9. (Optional) Establish long-term payment plans for households struggling to pay back a negative balance. Unpaid meal charges may be carried over at the end of the school year (i.e., beyond June 30) as a delinquent debt and collection efforts may continue into the new school year. This allows SFAs to work with individual families to establish longer repayment plans and to continue pursuing collection efforts when children change schools within the district or move to a new school outside the district. When local officials determine further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt."

Key Memos Cover

On-site Monitoring

Can be found here: http://doe.sd.gov/cans/memos.aspx

Nonprogram Food Revenue Requirements

Can be found here: http://doe.sd.gov/cans/documents/S20-16-Memo.pdf

Unpaid Meal Charges Guidance And Q/A

Can be found here: http://doe.sd.gov/cans/documents/SP23-2017-UPMeals.pdf

Unpaid Clarification

Can be found here: http://doe.sd.gov/cans/documents/SP47-2016-UPM.pdf

Other memos can be found: http://doe.sd.gov/cans/memos.aspx

On-Site Monitoring Cover

Can be found here: http://doe.sd.gov/cans/memos.aspx

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January 2007

SUBJECT: On-Site Review Worksheet
Assessment of the School Meal Count System

NSLP – 52.1

TO: Authorized Representatives
National School Lunch Programs

FROM: Child and Adult Nutrition Services

This information should be shared with school food service staff and the original should be placed in the numbered memo notebook from Child and Adult Nutrition Services. The memo is also available on the Child & Adult Nutrition Services website.

On-site reviews: Every school year, each school food authority with more than one school shall perform no less than one on-site review of the lunch counting and claiming system employed by each school under its jurisdiction. The on-site review shall take place prior to February 1st of each school year. Further, if the review discloses problems with a school's meal counting or claiming procedures, the school food authority shall: ensure the school implements corrective action; and, within 45 days of the review, conducts a follow-up on-site review to determine that the corrective action resolved the problems. Each on-site review shall ensure that the school's claim is based on the counting system authorized by the state agency under section 7CFR 210.7 (c) and that the counting system, as implemented, yields the actual number of reimbursable free, reduced price, and paid lunches, respectively, served for each day of operation. [7CFR 210.8 (a)(1)].

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At a minimum, Attachment 1 must be completed annually by February 1st for each location where meals are served. Attachment 2 is an optional review form that can be completed to review all aspects of the Child Nutrition Programs whether there is only one site or multiple serving sites. Attachment 1 must be completed by the Authorized Representative to review meal counting and claiming procedures. Attachment 2 does not have a mandatory deadline but reviews a combination of food service concerns and can be completed by the school administrator and/or the food service director or kitchen manager. The completed attachments should be filed with yearly records and kept on file for the current year and the next three succeeding years.

Attachment 1
On-Site Monitoring Required Worksheet

SFA:	School:

REVIEW AREAS	YES	NO	N/A	COMMENTS
Meal Count and Claiming				
1. Can the person responsible for monitoring meals identify reimbursable meals served for the meal pattern and whether offer vs. serve is implemented in compliance with the Child and Adult Nutrition Services approved policy?				
2. Does this person know the school's policies for handling: Lost, stolen, forgotten, or destroyed tickets, tokens, ID's?				
Visiting student meals?				
Adult guest's meals?				
Offer vs. Serve?				
A la carte sales?				
Second meals?				
3. Is someone trained as a backup for the meal count person?				
4. Is a current eligibility list maintained and available only to the appropriate personnel?				
5. Is the method used for counting meals in compliance with the point of service requirement or with the Child and Adult Nutrition Services approved alternate policy? (Meal counts cannot be completed in the classroom unless the meal is served in the classroom.)				
6. Is the method for counting meals by category accurate?				
7. Is there a method of recording non-reimbursable meals (distinguishing them from reimbursable meals, i.e., second meals that are sold, meals that don't meet meal requirements?)				
8. Does the system prevent overt identification?				
9. Is the point of service meal count used to determine the school's claim for reimbursement?				
10. Are daily count for all serving lines, meal periods, etc., correctly totaled and recorded?				
11. Are school level edit checks completed and documented?				
12. Have two on-site monitoring review forms been completed for current school year for Snack After School?				
For Systems with Cash Intake				
13. Is there a second-party count of cashier's cash intake?				
14. Is cash reconciled daily and are differences recorded?				
15. Is it ensured that counts are not adjusted or "backed out" to correspond with cash intake?				
16. If the SFA uses an electronic system, are there policies or procedures in place for a backup method?				
17. Are procedures in place to update eligibility status as needed?				

REVIEW AREAS	YES	NO	N/A	COMMENTS
For Provision 2 Agencies (Not a Base Year)				
18. Has the SFA discontinued collecting meal benefit applications on a yearly basis?				
19. Is the meal count person checking to be sure each student has selected a reimbursable meal?				
20. Is the program a non-pricing program? (no money is being collected for student meals.)				
21. Does the meal count person know they do NOT have to record meal counts by student names?				
22. Are the applications from a base year still available? (Records must be kept longer than three years.)				
23. Does the SFA report meal counts based on percentages that were established during the base year? (Is the base year monthly percentages chart used when submitting the monthly claims?)				
24. Have administrative staff attended an approved refresher training offered by CANS for current school year?				
For Provision 3 Agencies (Not a Base Year)				
25. Has the SFA discontinued collecting meal benefit applications on a yearly basis?				
26. Is the meal count person checking to be sure each student has selected a reimbursable meal?				
27. Is the program a non-pricing program? (no money is being collected for student meals.)				
28. Does the SFA submit monthly meal counts based on enrollment using percentage factor established in base year rather by student names or actual meal counts?				
29. Does the meal count person know they do NOT have to record meal counts by student names?				
30. Are the applications from the base year still available? (Records must be kept longer than three years.)				
31. Have administrative staff participated in an approved refresher training offered by CANS for current school year?				
Corrective Action Plan: (Recommended Corrective Action for above "no" answers.)				
Follow-Up Visit: (Corrective Action taken by school and date implemented):				

School Site Signature (Food Service Director or Manager) Title Date

School Food Authority Signature Title Date

Attachment 2
On-Site Monitoring Optional Worksheet

SFA:	School:

REVIEW AREAS	YES	NO	N/A	COMMENTS
Civil Rights				
1. Is the most current USDA/FNS "Justice for All" poster hung in a highly visible location that can be seen by students, faculty, and community people as they proceed through the tray line or where they receive their meal?				
2. Are children eligible for free or reduced price meals allowed all the same choices as the paying children?				
3. When using a name checklist in the lunchroom, is it coded in such a way that it is obvious to others which children are receiving free or reduced price meals (for example, color coding, symbols, numbers, obvious codes such as F,R,P; 1,2,3)?				
4. When using a computer system for doing meal counts and cash transactions, does the system prevent overt identification? (for example, eligibility status does not show up on the screen)				
5. Are multiple meal tickets available only to children eligible for free or reduced price meals?				
6. Are single meal tickets available only to paid students?				
7. Are accommodations made for students with physical disabilities so they can easily access the cafeteria and tray lines?				
8. Does the SFA have policies and procedures for working with students needing special diets? (i.e., special diet request form completed by a physician and a resource such as a local dietician.)				
Meal Patterns				
9. Is the food service staff planning and preparing meals according to the meal pattern indicated in the annual agreement? (for example, Traditional Menu Pattern, Enhanced Menu Pattern, Nutrient Standard Menu Pattern)				
10. Does today's menu have all required menu components?				
11. Are menus planned in advance to assure good use of commodities, foods on hand, adequate purchasing procedures?				
12. Do the portion sizes appear to meet the minimum meal pattern requirements?				
13. Is offer versus serve properly implemented? ☐ Elementary				
☐ Middle School / Jr. High				
☐ High School				
Explain "NO" answers in comments section.				

REVIEW AREAS	YES	NO	N/A	COMMENTS
Point of Service Reimbursable Meal Count				
14. Are daily meals claimed based on morning classroom counts, or counts taken at any other location before the meals is served?				
15. Are daily meals claimed based on attendance records?				
16. Is the point of service and meal count person located at the end of the tray line?				
17. If CANS has given approval to do meal counts at the beginning of the tray line, is there someone who is responsible at the end of the line to be sure each tray has all the required menu components?				
18. Are meal counts based only on tray or plate counts?				
19. Does the meal count person look at each tray to be sure students have selected the minimum number of menu components so their meal can be claimed for reimbursement?				
20. Are any of the required menu components located in the lunch room after students go through the tray line that would be not considered extra items? (for example the milk cooler, salad bar, or specialty bar. All menu components must be available to students at point of service.)				
Menu Production Records				
21. Is the food service staff completing a daily production record for each meal service? (for example, a breakfast menu record, a lunch menu record, a snack menu record)				
22. If the SFA has an outside entity prepare the daily meals, is a daily production record provided?				
23. Is the staff keeping daily production records in a safe location, such as a 3-ring binder, in date order?				
24. Is the staff using an approved production record form appropriate for Traditional Menus, Enhanced Menus, or Nutrient Standard Menus? (See NSLP Memo #9A for prototype forms and instructions.)				
25. If the food service is using a production record that is not one of the prototypes shown in NSLP Memo #9A, has it been approved for use by CANS?				
26. Are all sections of the daily production record being completed daily? (for example, planned servings for each menu item and age group; planned portions for seconds, adults, and ala carte; quantities for leftovers or added foods; total number of student and adult meals.)				
27. Is the most recent health/sanitation report posted in a highly visible location for students, staff or community people to read?				
28. Have the errors that may have been cited on the last health inspection report been corrected?				
29. Have errors that may have been cited on the last fire inspection report been corrected?				
30. Does the food service manager/director/head cook have a written food safety plan that itemizes standard operating procedures?				

REVIEW AREAS	YES	NO	N/A	COMMENTS
31. Is the kitchen staff completing food temperature logs for their refrigerator/cooler and freezer?				
32. Are toxic or poisonous items stored away from food items?				
33. Does the SFA have policies and procedures in place for: □ Controlling keys to kitchen and storage areas?				
□ Keeping food supply safe and secure?				
□ When outside groups use the kitchen facilities?				
□ Controlling unauthorized people/traffic in kitchen area?				
□ Monitoring freezer temps during school breaks?				
34. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)				
35. Is first in, first out method of inventory rotation practiced? (FIFO)				
36. Are all foods stored in facilities belonging to the local agency?				
USDA Commodities				
37. Does the School Food Authority (SFA) receive commodities? If no, skip questions 37-44.				
38. Does the food service staff have a perpetual inventory record of all USDA commodities that is up to date?				
39. Is adequate space available for storage?				
40. Is there an excess supply of any commodity product? (an amount of stock which would exceed a 6 month supply)				
41. Are adequate safeguards in place to minimize or prevent theft, spoilage, or insect/rodent infestation? (Storeroom should be lockable.)				
42. Is first in, first out method of inventory rotation practiced? (FIFO)				
43. Are all foods stored in facilities belonging to the local agency?				
44. Do program personnel know the procedures for submitting claims for loss of USDA commodities?				
Other				
45. Is space available for food service staff to complete and store records at the school? (No work papers of confidential nature should be worked on or kept at home.)				
46. Are there any other food service program concerns that need to be addressed at this time? (Describe in comments section area.)				

Corrective Action Plan: (Recommended Corrective Action for above "NO" answers):
Follow-Up Visit: (Corrective Action taken by school and date implemented):

School Site Signature (Food Service Director or Manager) Title Date

School Food Authority Signature Title Date

Nonprogram Food Revenue Requirements

Can be found here:

http://doe.sd.gov/cans/documents/S20-16-Memo.pdf

USDA

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: December 23, 2015

MEMO CODE: SP 20 – 2016

SUBJECT: Nonprofit School Food Service Account
Nonprogram Food Revenue Requirements

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Section 206 of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA) amended section 12 of the Richard B. Russell National School Lunch Act by adding paragraph (q) on nonprogram foods. This amendment established requirements related to the revenue from the sale of nonprogram foods. On June 17, 2011, the Food and Nutrition Service (FNS) issued an interim rule, *National School Lunch Program: School Food Service Account Revenue Amendments Related to the Healthy, Hunger-Free Kids Act of 2010* (76 FR 35301), amending the requirements related to revenue from nonprogram foods at 7 CFR 210.14(f). FNS also issued guidance related to implementation of section 206 in policy memorandums SP 13-2014 (http://www.fns.usda.gov/sites/default/files/SP13-2014os.pdf) and SP 39-2011 (http://www.fns.usda.gov/sites/default/files/SP39-2011r.pdf).

State agencies and school food authorities (SFAs) continue to pose questions regarding implementation of these requirements and the interaction with the existing revenue requirements found in 7 CFR 210.14(a). This memorandum provides guidance on the revenue requirements including options for assessing compliance to fulfill the requirements in section 206.

Nonprogram Revenue Requirements

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:

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

USDA

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: December 23, 2015

MEMO CODE: SP 20 – 2016

SUBJECT: Nonprofit School Food Service Account
Nonprogram Food Revenue Requirements

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

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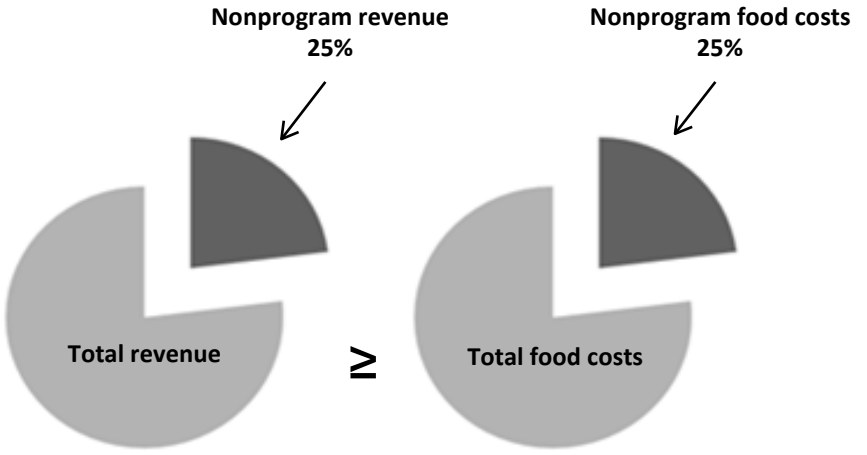
Nonprogram Revenue Requirements

Under subsection 12(q) of the Richard B. Russell National School Lunch Act and 7 CFR 210.14(f), SFAs are required to ensure:

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

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

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



To simplify the assessment, the statutory requirement states that only food costs are to be used to measure compliance. Research indicates that the cost of nonprogram foods, as a percent of total food cost, is a reasonable proxy for all costs associated with obtaining foods, (i.e., the cost of food, labor, direct and indirect costs). This means if an SFA is able to show that the percent of nonprogram food costs is less than the percent of nonprogram revenues, the SFA generated enough revenue to cover all reported costs associated with nonprogram foods. Thus, the requirement focuses on nonprogram food costs as a percent of total food costs in an effort to simplify the requirement and eliminate the burden of documenting labor and other costs.

Nonprogram Foods Sale Transactions

When nonprofit school food service account funds are used to provide goods and services (e.g., catering and vending) for outside entities such as the superintendent's office, school board, or student clubs, there are two separate transactions that occur. The first transaction is between the

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

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

Program regulations do not restrict revenues earned from the sale of competitive foods that are purchased with funds outside of the nonprofit school food service account, i.e. the general fund. However, State agencies and SFAs are reminded that to the extent such foods are sold on the school campus during the school day, the "Smart Snack" requirements at 7 CFR 210.11 apply.

Assessing Compliance Options

FNS understands there is wide variation in the capabilities of systems and mechanisms SFAs employ to maintain and monitor their school food service accounts. Separating out the SFA's costs for nonprogram foods from the costs for program food may be particularly difficult. In recognition of the current variations in system capabilities, FNS is providing a simplified approach for SFAs to assess compliance with this requirement going forward.

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

If the SFA is able to show that the percentage of nonprogram revenue generated is at least as great as the percentage of nonprogram food costs incurred during the reference period, the SFA is in compliance with Federal requirements.

SFAs with the capacity to obtain separate nonprogram and program food cost and revenue data for a period longer than 5 consecutive days (e.g., monthly, annual, biweekly) are strongly

encouraged to use data from the longer period to perform the assessment. All revenue and cost data used to assess compliance must reflect the same reference period. For example, if the revenue ratio is calculated using October 2014 data, the cost ratio must be calculated with October 2014 data. Similarly, if revenue information from the full 2014-2015 school year is used to calculate the revenue ratio, food cost information for the full 2014-2015 school year must be used to calculate the food cost ratio.

Detailed guidance on how to perform the cost/revenue assessment is provided in the attached question and answer document.

State agency monitoring

Compliance with the nonprogram revenue requirement is reviewed through the resource management section of the Administrative Review process. While noncompliance with the revenue from nonprogram foods requirements is not subject to fiscal action as defined under 7 CFR 210.18(m), State agencies must ensure that SFAs secure funding to make up any shortfalls in the nonprofit school food service account and/or otherwise take steps to ensure that nonprogram foods are priced sufficiently to meet the nonprogram foods requirement. It is important for State agencies and SFAs to work together to develop practices to ensure the financial viability of the nonprofit school food service account.

State agencies are reminded to distribute this guidance to SFAs immediately. SFAs should contact their State agencies for additional information. State agencies may direct any questions concerning this guidance to the appropriate FNS Regional Office.

Original Signed

Sarah E. Smith-Holmes
Director
Program Monitoring and Operational Support Division
Child Nutrition Programs

Assessing Compliance with Nonprogram Revenue Requirements

Overview of Assessment

1. What formula must be used to assess compliance?

Regulations at 7 CFR 210.14(f) require SFAs to ensure the revenue ratio is greater than or equal to the food cost ratio, as follows:

$$\frac{\text{Nonprogram food revenue}}{\text{Total revenue}} \geq \frac{\text{Total food cost}}{\text{Total cost}}$$

2. Are there alternative calculations SFAs may use other than the food cost/revenue proportion to assess compliance?

No. The revenue/food cost ratio is required by statute and regulations. FNS evaluated a number of alternative strategies but found none that would accurately capture statutory and regulatory intent.

However, SFAs with a full cost accounting system, one designed to measure the complete, true costs of goods and services or those that establish the sale price of nonprogram foods by a certain percentage mark-up, may actually be in compliance. SFAs will only be considered compliant if they meet the minimum requirements set forth in 7 CFR 210.14(f) and as described in this and other applicable policy memoranda.

3. How should school food service operations that offer a limited number of a la carte items (i.e. milk only) comply with nonprogram foods requirements?

Some SFAs may offer a limited number of nonprogram food items with an identifiable per serving cost (i.e., only sell milk a la carte) and are not able to accurately perform the assessment. In these instances, the SFA may be charging the full cost for the nonprogram foods offered, but due to the small number of these items in relation to the total revenue and cost, the assessment may overestimate the required increase.

State agencies may review these SFAs and determine that the compliance assessment does not fully represent the SFA's pricing practice and may instead base compliance on whether or not the SFA is recovering more than the per-serving food cost of these nonprogram items.

4. How is the revenue ratio established?

To establish the *revenue ratio*, divide the nonprogram food revenue by the total revenue of the school food service account.

$$RRRRRRRRRRRRRR\,rrrrrrrrrr = \frac{NNrrRRNNrrrrNNrrrrNN \quad ffrrrrff \quad rrRRRRRRRRRR}{TTrrrrrrTT \quad NNrrrrNNrrrrNN \; rrRRff \; RRrrRRNNrrrrNNrrrrNN \; rrRRRRRRRRRR}$$

The nonprogram revenue is the revenue generated from the sale of nonprogram foods. The total revenue is the sum of revenue from program foods plus the revenue from the sale of nonprogram foods, both of which are deposited into the SFA's nonprofit school food service account. To assist SFAs, FNS developed the *Nonprogram Foods Revenue Tool*, which identifies the dollar amount when a discrepancy occurs.

5. How is the food cost ratio established?

To establish the *food cost ratio*, divide the sum of all nonprogram food costs by total food costs.

$$Food\ cost\ ratio = \frac{TTNNTTNNTT\ NNNNNNNNNNNNNNNNNN\ ffNNNNff\ ccNNccTTcc}{TTNNTTNNTT\ NNNNNNNNNNNNN\ NNNNff\ NNNNNNNNNNNNNNNNNN\ ffNNNNff\ ccNNccTTcc}$$

Total nonprogram food costs are the food costs for all nonprogram food purchased with funds from the nonprofit school food service account. The total program and nonprogram food costs are the food costs for both program and nonprogram foods purchased with funds from the school food service account.

6. How does the comparison of the revenue ratio to the food cost ratio work?

The SFA must compare the revenue ratio to the food cost ratio and determine if the revenue ratio is equal to or greater than the food cost ratio. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is properly pricing nonprogram foods and no further action is required.

$$Revenue\ ratio \geq FFrrrrff\ ccrrccrr\ rrrrrrrrrr$$

If the revenue ratio is less than the food cost ratio, the SFA has priced nonprogram foods too low, and must increase nonprogram food prices until the revenue ratio is equal to or greater than the food cost ratio or contribute non-federal funds to the nonprofit school service account to address the revenue shortfall.

Step 1: Determining the reference period

7. Who establishes the reference period?

State agencies may establish the reference period for all SFAs or the State agency may allow each SFA to establish the reference period. The reference period may be a school week, a month, or year; however, the reference period must include at least 5 consecutive operating days (or 4 consecutive days for schools operating a 4 day week). The selected days must represent typical food service operations. Assessments cannot include data from summer school, holidays, or vacations or special circumstances that might distort the program and nonprogram foods data.

8. What data is needed for the reference period?

SFAs must collect the following SFA-wide information for the reference period:

- For nonprogram food revenue, the dollar amount of nonprogram food sales, including a la carte sales, adult meals, vending machines, and any other nonprogram food purchased with nonprofit school food service account funds. .
- For total revenue, the dollar amount of program and nonprogram food sales.
- For nonprogram food cost data, include:
  - An itemization of all nonprogram foods to be offered during the reference period;
  - The per item/serving cost of each nonprogram food, including food sold only as nonprogram food, food sold as program and nonprogram food (crossover food);
  - The number of servings/items sold.
- For total food cost data, include all nonprogram food cost data and program food cost data. Program food cost data should be readily available using production records, invoices, etc.

Step 2: Identifying nonprogram foods offered during the reference period

9. What is a nonprogram food?

A nonprogram food means any food (other than reimbursable meals) or beverage purchased using nonprofit school food service account funds. Examples of nonprogram foods include a la carte foods, adult meals (see FNS Instruction 782-5) and food items purchased for vending machines, school stores, etc.

10. Must I identify all nonprogram foods offered throughout the school year?

For purposes of the nonprogram foods cost/revenue assessment, the SFA must identify only those nonprogram foods sold during the reference period.

11. How should costs and revenue from catering, vended meals, or purchasing for other entities be included in this assessment?

Due to potential complexities of accounting for food cost and revenues from catering, vended meals, or purchasing for other entities, including these costs and revenues during a reference period is not required.

SFAs may choose to include these costs/revenues to simplify the assessment. SFAs including these food service activities in their assessment MUST include BOTH the food costs of providing these services and the revenues generated in the calculations for the selected reference period.

If the revenues from these activities are not included in the calculation of the total revenue and cost ratios, SFAs must be able to provide proper documentation, such as purchase agreements, invoices, the agreement with the entity and information demonstrating the recovery of the full costs.

Step 3: Determining Nonprogram Food Costs

12. How is the total nonprogram food cost determined?

Total nonprogram food costs are the cost of all foods sold during the reference period, including foods sold only as nonprogram foods, and foods served in program meals and also sold as a nonprogram meal (crossover items).

To determine the total food cost of all nonprogram foods for the reference period:

a. Determine the food cost for each nonprogram food sold by multiplying the cost per serving/item by the quantity sold as a nonprogram food.

b. Add the food cost for each nonprogram food. The sum of the costs of all nonprogram food items sold during the reference period will be the total nonprogram food cost amount entered as the numerator in the food cost ratio.

Food cost for nonprogram item # 1 *(cost per serving X quantity sold as nonprogram food)* + Food cost for nonprogram item # 2 *(cost per serving X quantity sold as nonprogram food)* + Food cost for nonprogram item # 3 *(cost per serving X quantity sold as nonprogram food)* Nonprogram food costs for the reference period

13. If records do not separate program and nonprogram food costs, how are these costs determined?

If records do not separate program and nonprogram food costs, SFAs are required to identify (a) all nonprogram foods sold during the reference period and (b) for each nonprogram food sold, identify the cost per serving/item by the quantity sold as a nonprogram food.

14. How do SFAs with fixed price Food Service Management Company (FSMC) contracts comply with the nonprogram foods requirements in 7 CFR Part 210.14?

An SFA with a fixed price FSMC contract may not have the food cost data needed to determine its compliance with the revenue from nonprogram foods requirements. This is because food costs are not disclosed in a fixed price contract awarded on a per meal basis and when revenues from nonprogram foods sales are converted into meal equivalents to which the fixed price cost is applied. To obtain the information it needs, an SFA issuing a solicitation for a fixed price contract should include language in its FSMC solicitation requiring respondents to agree to provide nonprogram foods cost information and ensure that the final fixed price contract implemented reflects this requirement. Fixed price FSMC contracts for SY2016-2017 must be amended to include this information for compliance with the nonprogram foods and revenues requirement in 7 CFR Part 210.14.

In the soon-to-be-released updated version of FSMC Guidance Handbooks for State agencies and SFAs, FNS will address this issue.

The updated FSMC guidance will provide the following instructions:

In the solicitation and contract, it is crucial for SFAs to provide specific information about the food service operation and all required products and services they are seeking to procure. For example, essential information includes:

- For fixed price per meal contracts, awarded on a per meal basis and with revenues from nonprogram foods sales converted into meal equivalents to which the fixed price cost is applied, the FSMC will annually provide information on food costs and revenues. The information must include food cost for reimbursable meals, food cost for non-program foods, revenue from non-program foods, and total revenue. Nonprogram foods include: a la carte; catering; vending; and student stores operated, or any other sales generated through the nonprofit school food service account not already described. This information is used to determine compliance with revenue from nonprogram foods at 7 CFR 201.14(f).
- Historical information on the type and value of nonprogram foods and meals to be offered such as other food service operations, for example, catering. When the FSMC will be responsible for providing the SFA with, or calculating nonprogram food costs and program revenues for compliance with the 7 CFR Part 210.14(f), the contract must clearly identify this requirement.

15. How is the cost determined for foods sold only as nonprogram foods?

For each food sold only as a nonprogram food, determine a per serving/item cost by dividing the case cost by the number of servings per case.

$$\frac{CCrrccRR\ ccrrccrr}{NNRRNNNNRRrr\ rrff\ ccRRrrRRrrRRNNcc/rrrrRRNNcc\ NNRRrr\ ccrrccRR} = ccrrccrr\ NNRRrr\ ccRRrrRRrrRRNN/rrrrRRNN$$

For example, if a bag of whole grain oatmeal chocolate chip cookies is only sold on the a la carte line or in a vending machine, the price per bag should be determined using invoices and other information.

16. How is the cost determined for foods prepared from scratch and/or sold as both part of a reimbursable meal and as an a la carte item?

"From scratch" is an idiom meaning from the beginning. Therefore, food items prepared "from scratch" are food items that have been prepared from the beginning, using a recipe of ingredients yielding an end product. Crossover items are those foods sold as a part of a program meal and also served as a nonprogram food, (e.g., a serving of lasagna sold as part of a reimbursable meal and also as a single item on the a la carte line).

For each, determine per serving costs using food invoices to calculate the cost of ingredients and per serving cost in a recipe, and production records to determine the number of servings prepared. Determining per serving food costs may be difficult particularly for SFAs that prepare foods "from scratch".

$$\frac{SSRRNN\ rrff\ NNrrmmrrrr\ ffrrrrff\ ccrrccrrcc\ rrRR\ rrRRccrrNNRR}{TTrrrrrrTT\ NNRRNNNNRRrr\ rrff\ ccRRrrRRrrRRNNcc\ rrRRccrrNNRR\ yyrrRRTTffcc} = CCrrccrr\ NNRRrr\ ccRRrrRRrrRRNN\ rrff\ rrRRccrrNNRR$$

SFAs should use the recipe and ingredient costs to develop a reasonable estimate for these items and may use discretion when including spices and other ingredients that are added in minimal amounts to the recipes.

17. Is a costing adjustment required if the portion of an item used in both the reimbursable meal and a la carte line is larger when sold as a nonprogram food?

The serving size is a major factor in determining the per item cost. For example, school lunch pizza may be cut to 10 slices per pizza but that same pizza is cut to only 8 slices per pizza for nonprogram slices. If the price per pizza is $7.50, the per slice cost for the school lunch program would be $0.75/serving ($7.50/10) and for the nonprogram serving it would be $0.94 per slice ($7.50/8).

The Institute of Child Nutrition's Food Buying Guide (http://fbg.nfsmi.org/) provides useful information for determining the serving sizes for food items either sold individually or incorporated into recipes.

18. How is the food cost for items used as both program and nonprogram foods determined?

The easiest way to determine the price for items that may be served as either program or nonprogram food is to determine the cost for the smallest serving size offered and then modify the costs accordingly for other serving sizes offered.

For example, if the SFA determined that the costs of a ½ cup of marinara served with spaghetti as part of a reimbursable meal is $0.80 and the same marinara is served as a dip for breadsticks on the a la carte line as a ¼ cup serving, then the cost per ¼ cup serving should be determined as $0.40. The price for the serving of marinara with the breadstick (1/4 c.) would be half the price of the amount served with the spaghetti (1/2 c.). These amounts should then be added accordingly to the price per serving of breadsticks or spaghetti.

EEEErrNNNNTTRR 1: PPrrrrccRR NNRRrr ccRRrrRRrrRRNN rrff NNrrRRrrffccrrrrccbbcc (2) = $0.12
PPrrrrccRR NNRRrr ccRRrrRRrrRRNN rrff MMrrrrrrRRrrrrrr rrRRff NNrrRRrrffccrrrrccbbcc = $0.40 + $0.12 = $0.52

EEEErrNNNNTTRR 2: PPrrrrccRR NNRRrr ccRRrrRRrrRRNN rrff ccNNrrNNhRRrrrrrr (1 ccRRNN) = $0.08
PPrrrrccRR NNRRrr ccRRrrRRrrRRNN rrff MMrrrrrrRRrrrrrr rrRRff ccNNrrNNhRRrrrrrr = $0.80 + $0.08 = $0.88

Step 4: Interpreting the Results

19. What steps should be taken if the revenue/food cost ratio comparison indicates that the revenue ratio is higher than the food cost ratio?

No further action is required. If the revenue ratio is equal to or greater than the food cost ratio, the nonprofit school food service account is not subsidizing nonprogram food activity.

20. What if the food cost ratio is higher than the revenue ratio?

If the food cost ratio is higher than the revenue ratio, the nonprofit school food service account is subsidizing the cost of nonprogram foods and the SFA must revise its nonprogram food pricing structure to increase the revenue to ensure the revenue ratio is greater than or equal to the food cost ratio. Alternatively, the SFA could provide non-federal funds in the amount of the revenue shortfall to the nonprofit school food service account. For example, if the revenue ratio is 21 percent and the food cost ratio is 23 percent, action must be taken to raise the price of nonprogram food or add non-federal funds as appropriate.

21. What actions can be taken to raise the price of nonprogram foods?

Simply raising revenue by the difference between the two ratios for each nonprogram food item will not resolve the discrepancy (i.e., in the pie chart example, raising the cost of all nonprogram foods by 5% will most likely not be sufficient).

To assist SFAs, FNS developed the *Nonprogram Foods Revenue Tool*, which identifies the dollar amount when a discrepancy occurs. Knowing the dollar amount of the shortfall allows SFAs to determine appropriate adjustments to their nonprogram food pricing structure.

There are a range of actions an SFA may take to adjust prices, including:

- If certain nonprogram food items are not generating enough revenue to cover the costs of producing the items, increase the price of these items to more accurately reflect the cost or re-evaluate whether these items should be sold as nonprogram foods.
- If multiple nonprogram foods are sold as a unit and are also offered as a reimbursable meal, price the nonprogram food unit above the cost of the reimbursable meals.
- Selectively increase the prices of some but not all nonprogram foods items (i.e. less healthy food marked up by a greater amount than healthier choices).
- Review sales records and increase the prices of the more popular items.

22. Must SFAs increase the prices of all nonprogram foods?

SFAs have discretion in how prices of nonprogram foods are adjusted. For example, SFAs may wish to not raise the prices for a la carte fruits and vegetables but raise prices for other a la carte foods.

Unpaid Meal Charges: Guidance and Q&A

Can be found here: http://doe.sd.gov/cans/documents/SP23-2017-UPMeals.pdf

USDA

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: March 23, 2017

MEMO CODE: SP 23-2017

SUBJECT: Unpaid Meal Charges: Guidance and Q&A

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

This Question and Answer (Q&A) memorandum is designed to provide an overview of policies related to unpaid meal charges in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) and to address common questions the Food and Nutrition Service (FNS) of the United States Department of Agriculture (USDA) has received from State agencies, school food authorities (SFAs), and local Program operators.

The attached questions have been grouped under five headings: Meal Charge Policies, Student Eligibility for Free or Reduced Price Meals, Payment Options and Payment Reminders, Alternate Meals, and Debt Collections.

This updated version includes one new question (Question 13) and four revised questions (Questions 11, 19, 20, and 21). These questions were added or revised to address clarifications requested by stakeholders and are marked as *[New/Revised]* within the attachment. FNS will revise this Q&A as needed to address other questions as they arise. The attached Q&A supersedes SP 57-2016: *Unpaid Meal Charges: Guidance and Q&A*, September 16, 2016.

Additional Policy Guidance and Resources
This Q&A supplements other FNS policy memoranda related to unpaid meal charges, which include the following:

- SP 46-2016: *Unpaid Meal Charges: Local Meal Charge Policies*, July 8, 2016, http://www.fns.usda.gov/unpaid-meal-charges-local-meal-charge-policies
- SP 47-2016: *Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments*, July 8, 2016, http://www.fns.usda.gov/unpaid-meal-charges-clarification-collection-delinquent-meal-payments

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Food and Nutrition Service

Park Office Center

3101 Park Center Drive
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FNS has developed additional resources State agencies and SFAs can use in their effort to address the challenge of unpaid meal charges. These resources are available on the FNS Unpaid Meal Charges website (http://www.fns.usda.gov/school/meals/unpaid-meal-charges) and include:

- A guide summarizing FNS policy guidance and best practices from State agencies, schools, and other key stakeholders;
- Webinars sharing ideas and strategies to address unpaid meal charges; and
- Other relevant policy memoranda and guidance documents developed by FNS.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm. State agencies should direct questions to the appropriate Food and Nutrition Service Regional Office.

Angela Kline
Director
Policy and Program Development Division
Child Nutrition Programs

MEAL CHARGE POLICIES

1. Must the required meal charge policy be developed at the school food authority (SFA) level?

State agencies and SFAs have discretion in developing the specifics of individual meal charge policies, including the level at which the policy is developed. State agencies may develop a State-level meal charge policy to be implemented by all SFAs throughout the State. Alternatively, State agencies may choose to outline a general policy, giving SFAs discretion to tailor the policy based on local conditions. In the latter case, a combination State/SFA-level policy is allowable, as long as the SFA-level policy does not contradict the overarching State-level policy.

If the State agency does not develop a State-level policy, SFAs must develop and implement an SFA-level policy. This is intended to avoid inconsistent or varying policies within an SFA that create confusion for families, especially when children transition to a new school or families have children attending different schools within the SFA. SFAs do have discretion, however, to vary the policy based on student grade level. For more information, please see "Meal Charge Policy Considerations" on page 2 of SP 46-2016: *Unpaid Meal Charges: Local Meal Charge Policies*, July 8, 2016, http://www.fns.usda.gov/unpaid-meal-charges-local-meal-charge-policies.

2. Are SFAs permitted to adopt a standard practice about how to handle meal charges instead of establishing a formal policy?

SP 46-2016 requires all SFAs operating the Federal school meal programs to have in place a written and clearly communicated system to address meal charges. The Food and Nutrition Service (FNS) will refer to this as a policy, but whether this is referred to as a "policy" or "standard practice" is at the discretion of the State agency or SFA. Whichever terminology is used, the policy or standard practice must consist of a written document explaining how the SFA will handle situations where children eligible to receive reduced price or paid meals do not have money in their account or in hand to cover the cost of their meal at the time of service. The policy or standard practice must be implemented throughout the SFA.

3. Are SFAs required to obtain school board approval for their meal charge policy?

Although there is no Federal requirement for school board approval of the local meal charge policy, SFAs should consult with local administrators about any additional local requirements for the establishment of an SFA-level meal charge policy.

4. What are the communication requirements for the meal charge policy?

Whether developed at the State or SFA level, SFAs must ensure the policy is provided in writing to all households at the start of each school year and to households transferring to the school or school district during the school year. Additionally, SFAs are encouraged to include the policy in student handbooks and/or on online portals that households use to access student accounts. While not required, SFAs are encouraged to provide the written policy again to the household the first time the policy is applied to a specific child (e.g., by mail, email, or a note home).

SFAs also must provide the written meal charge policy to all school or SFA-level staff responsible for policy enforcement. This includes school food service professionals responsible for collecting payment for meals at the point of service, staff involved in notifying families of low or negative balances, and staff involved in enforcing any other aspects of the meal charge policy. School social workers, school nurses, the homeless liaison, and other staff members assisting children in need (or who may be contacted by families with unpaid meal charges) also should be informed of the policy. In addition, FNS strongly encourages SFAs to provide information about the policy to principals and other school or district administrators to ensure they are familiar with and supportive of the policy.

5. May an SFA simply post the meal charge policy on its website to meet the policy communication requirement?

Beginning in school year (SY) 2017-2018, and each year thereafter, the meal charge policy must be communicated in writing to all households at the start of each school year and to households transferring to the school during the school year. While posting the policy online or sending it to families by email is helpful, it will not ensure the information reaches all households, particularly those households without access to a computer or the internet. Therefore, SFAs must have a method in place to ensure the policy is provided in writing to all households at the start of each school year and to households transferring to the school during the school year.

The following are methods SFAs could use to communicate the policy to families:

- Include a letter to households explaining the meal charge policy when sending "back-to-school" packets with student registration materials;
- Include the policy in the print versions of student handbooks, if provided to parents and guardians annually; and/or
- Include the written policy when using existing notification methods to inform families about applying for free or reduced price meals, such as distributing household applications at the start of the school year.

SFAs also are encouraged to redistribute the policy to the family the first time the policy is applied to a specific child and mention the charge policy on reminder calls or in written notices of low or negative account balances.

6. How often should SFAs revise or update their policy?

Although it is not required, SFAs are encouraged to revise their policy on a regular basis (e.g., annually). Regularly reviewing the policy, assessing its effectiveness, and incorporating new feedback will allow the policy to evolve to better meet the needs of schools, families, and children.

7. Are SFAs required to maintain records related to the meal charge policy?

Yes. Policies developed at the SFA level must be maintained and provided to the State agency during the Administrative Review. SFAs also must maintain documentation of the methods used to communicate the policy to households and school or SFA-level staff responsible for policy enforcement. If a State-level policy is implemented, the SFA must maintain records to demonstrate how the policy was implemented and communicated to households by the SFA.

STUDENT ELIGIBILITY FOR FREE OR REDUCED PRICE MEALS

8. How early may schools begin the school meal application process?

To prevent children who are eligible for free or reduced price school meals from accruing unpaid meal charges, schools should ensure families are aware of the application and return their application prior to the first day reimbursable meals are offered. According to 7 CFR 210.2, the official start of the school year is July 1. As long as an application is submitted on or after this date, it is considered current for the new school year.

9. May schools accept applications after the school year begins?

Families may submit, and schools may accept, applications at any point during the school year. Schools must inform families of this, and remind families their child may become eligible for free meals at any time during the school year if the household experiences a change in financial circumstances. Schools also are encouraged to reach out to families experiencing an acute financial setback, such as a job loss or long-term illness, which may result in a change in eligibility status for the child.

Because of the year-long duration of eligibility, households certified for free or reduced price school meals are not required to report changes in their household income or categorical eligibility status. Once a child is approved for free or reduced price school meals, their eligibility status remains in effect for the duration of the school year. Additionally, children carry over their eligibility status for 30 operating days into the following school year, or until a new eligibility determination is made, whichever comes first.

10. Are schools permitted to eliminate the reduced price category as a strategy to prevent children eligible for reduced price meals from accruing unpaid meal charges?

Yes. At the discretion of the SFA, schools participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) may offer meals at no cost to children who would otherwise qualify for reduced price benefits. SFAs also could choose to lower the cost of reduced price meals below the maximum cost permitted (40 cents for reduced price lunch and 30 cents for reduced price breakfast). This is an allowable use of funds in the non-profit school food service account (NSFSA). SFAs electing to take advantage of this flexibility continue to receive reduced price Federal reimbursement based on meals claimed for children in the reduced price category.

SFAs considering this option are advised to conduct a thorough analysis of their current and projected operating costs to ensure they will be able to maintain operations and meal quality without children's payments for reduced price meals. For more information, please see SP 17-2014: *Discretionary Elimination of Reduced Price Charges in the School Meal Programs*, January 22, 2014, available at: http://www.fns.usda.gov/discretionary-elimination-reduced-price-charges-school-meal-programs.

11. *[Revised]* If a child graduates or moves to a new school district, may the SFA use funds remaining in the child's account to cover meal charge debt accrued by other children?

When any child leaves the district or graduates, SFAs must attempt to contact the child's household to return any funds remaining in the student's account. Households approved for reduced price meal benefits must receive a refund. There is a Federal requirement that children eligible for reduced price meals pay a maximum of 40 cents per lunch and 30 cents per breakfast; retaining the unused funds would result in the per meal price exceeding this amount.

However, SFAs may allow families who are not approved for free or reduced price meals to donate the funds remaining in their account rather than receiving a refund when their child leaves the school. These funds then could be used to cover unpaid meal charges that were uncollectable.

12. What alternative counting and claiming procedures are available to local educational agencies (LEAs) and schools struggling with unpaid meal charges?

The Community Eligibility Provision (CEP) is a meal service option for schools and school districts operating the school meal programs in high-need communities. CEP allows these schools to provide breakfast and lunch at no cost to all enrolled children without the need to collect applications or establish individual eligibility for a four-year period, thereby increasing access to school meals and eliminating unpaid meal charges. To learn more about CEP, please visit the CEP Resource Center: http://www.fns.usda.gov/school-meals/community-eligibility-provision-resource-center.

Provisions 2 and 3 also reduce the application burden and simplify counting and claiming procedures and eliminate unpaid meal charges by allowing low-income schools to serve meals to all enrolled children at no charge for a four-year period. Under Provision 2, reimbursement is determined by applying the percentages of free, reduced price, and paid meals served during the first year, or base year, to claims during subsequent years. Provision 3 is similar to Provision 2, except, each year, schools receive the level of Federal cash and commodity support paid to them during the base year adjusted to reflect changes in enrollment, inflation, and operating days. To learn more, see: http://www.fns.usda.gov/school-meals/provisions-1-2-and-3.

13. *[New]* Are schools operating CEP or Provision 2 required to develop a meal charge policy?

The requirement to develop a meal charge policy applies to the SFA, rather than to individual schools within the SFA. If all schools in an SFA operate a non-pricing provision (such as CEP and/or Provision 2), the SFA is not required to develop a meal charge policy, as no children would be charged for meals. However, if even one school in the SFA operates standard counting and claiming, the SFA must develop a meal charge policy. Meal charges would not occur at non-pricing schools within the SFA, but the SFA is still required to develop an SFA-wide policy for those schools operating standard counting and claiming. Though not required, SFAs currently operating a non-pricing provision district-wide may consider developing a meal charge policy that would be available and ready for implementation in situations where a school (or schools) in the district return to standard counting and claiming.

PAYMENT OPTIONS AND PAYMENT REMINDERS

14. What should schools consider when implementing a pre-payment system for reimbursable meals?

Encouraging families to pre-pay for meals at the reduced price or paid rate can help to ensure children have consistent access to healthy, reimbursable meals without accruing unpaid meal charges. Some SFAs even provide incentives, such as prize drawings, for families opting to pre-pay for their children's reimbursable meals. Any incentives involving offering discounts for families who pre-pay for reimbursable meals, however, must meet paid lunch equity (PLE) pricing requirements. For more information, see SP 09-2016: *Paid Lunch Equity: School Year 2016-2017 Calculations and Tool,* November 13, 2015, http://www.fns.usda.gov/paid-lunch-equity-school-year-2016-2017-calculations-and-tool.

If a pre-payment system is established, children and families must continue to have a method to add funds on the day of service. For example, families could make cash payments to the school office on the day of service.

SFAs also may wish to allow parents and guardians to limit the amount of funds that a student could use daily, particularly for à la carte purchases. The pre-payment system could include a feature to allow for parental restrictions at the point of service.

Finally, pre-payment systems for children approved for reduced price meals must ensure that all meals paid for are actually received or that the funds are carried over or are refunded. Federal regulations are clear that reduced price lunches may not exceed 40 cents and reduced price breakfasts may not exceed 30 cents. Therefore, payment for any meals not received by a student approved for reduced price meals must be refunded to the household.

For example, a household pre-pays $8 for one month of lunches (20 lunches x $0.40). If at the end of the month the household did not receive all 20 lunches, the remaining funds must be carried over into the next month or the money must be refunded to ensure that the student did not pay more than 40 cents per lunch.

15. May SFAs establish long-term payment plans for households struggling to pay back a negative balance?

Yes, SFAs may work with families to establish long-term repayment plans. Repayment plans may be especially helpful for households with income just above the threshold for free or reduced price meals or where income is sporadic. SFAs also are reminded that unpaid meal charges may be carried over at the end of the school year (i.e., beyond June 30) as a delinquent debt and collection efforts may continue into the new school year.

For more information, see SP 47-2016: *Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments*, July 8, 2016, http://www.fns.usda.gov/unpaid-meal-charges-clarification-collection-delinquent-meal-payments.

16. May schools enlist volunteers to assist with communicating payment reminders?

LEAs may disclose individual student eligibility information only to those persons (and organizations) who require the information in order to carry out an activity specifically authorized by the *Richard B. Russell National School Lunch Act* (NSLA, 42 USC 1751).

Therefore, LEAs and schools may not enlist the assistance of unauthorized persons, such as parent volunteers, to follow up with payment reminder or debt collection efforts related to unpaid meal charges. For example, if a school calls families with unpaid meal charges to remind them to replenish their accounts, only authorized persons may make those phone calls. For more information, please see SP 16, CACFP 06, SFSP 10-2016: *Disclosure Requirements for the Child Nutrition Programs*, December 7, 2015, http://www.fns.usda.gov/disclosure-requirements-child-nutrition-programs-0.

17. Are SFAs permitted to move the point of service (POS) to prevent the identification of children with unpaid meal charges?

Yes. There is no Federal policy regarding the specific location of the POS as long as reimbursable meals are identified and claimed appropriately. To prevent the unfortunate situation of having to take away or replace a child's reimbursable meal, SFAs may move the POS to the beginning of the lunch line. This helps the cashier determine which children, if any, are unable to pay for their meal, and allows the cashier to address the issue discretely before the child has selected a meal.

However, as part of the State agency agreement outlined in 7 CFR 210.9(b)(9), SFAs must count the number of free, reduced price, and paid reimbursable meals served to eligible children at the POS, or through another counting system if approved by the State agency. SFAs moving the POS to the beginning of the lunch line must have a monitor or other assurance to verify that children have the required components for a reimbursable meal after passing through the lunch line. 7 CFR 210.7(c)(2) explains the requirements for use of an alternate POS.

SFAs also must check with their State agency before moving the POS, as the State agency may have a specific State-level policy regarding its location. SFAs must comply with any State-level requirements for alternative POS locations.

18. Are SFAs required to prevent the overt identification of children through the method of payment used to purchase a meal?

Yes. According to 7 CFR 245.8, meal cards, tickets, tokens, or other methods of payment cannot be coded or colored in a manner which overtly identifies children based on free or reduced price eligibility status. Instead, SFAs are encouraged to use pre-payment systems to limit the exchange of money in the cafeteria. Publicizing pre-payment systems and encouraging their use by families can help prevent the charging of meals. For more information, see SP 45-2012: *Preventing Overt Identification of Children Certified for Free or Reduced Price School Meals,* August 24, 2012, http://www.fns.usda.gov/preventing-overt-identification-children-certified-free-or-reduced-price-school-meals.

Allowing families to check their account balance and add money electronically from a computer or mobile device also limits the exchange of money in the cafeteria. Often, even families who do not opt to pay using an online system can use the system to check their children's balance. However, SFAs cannot exclusively use an online system. SFAs using an online payment system must provide an alternative option to meet the needs of families who do not have access to a computer or who prefer to make their payment in person. For more information, see SP 02-2015: *Online Fees in the School Meal Programs*, October 8, 2014, http://www.fns.usda.gov/online-fees-school-meal-programs.

SFAs must include at least one method of payment that is free of charge. Because it is allowable to use NSFSA funds to pay usage fees, SFAs may consider covering any fees associated with using an online system for low-income families. Families must be notified about all payment systems used at the school, including any fees associated with specific payment options.

ALTERNATE MEALS

19. *[Revised]* Are SFAs opting to serve an alternate meal to children with unpaid meal charges required to meet FNS' meal pattern requirements?

SFAs seeking reimbursement for an alternate meal must meet the meal pattern requirements. SFAs not seeking reimbursement for an alternate meal are not required to meet the meal pattern requirements. FNS encourages schools to provide a reimbursable meal to all children who want one. Providing children with a reimbursable meal prevents the singling out of children with unpaid meal charges, provides children with the nutritional benefits of a reimbursable meal, and ensures the school receives the applicable Federal reimbursement for the meal. Schools providing a non-reimbursable alternate meal should aim to offer an economical meal that reflects FNS' nutritional goals.

To claim an alternate meal that limits choices to lower cost entrées and other components, schools must offer children at least two different types of fluid milk. In addition, a school participating in the offer versus service (OVS) provision must allow children to select up to five food components for the NSLP and four food items for the SBP.

20. *[Revised]* May SFAs charge children for an alternate meal? What must SFAs consider when pricing alternate meals?

While many SFAs providing alternate meals to children with unpaid meal charges choose to provide those meals for free, SFAs have discretion to charge children for alternate meals. There is wide variation in how alternate meals are provided, and the FNS requirements that apply to alternate meals will vary depending on the way an SFA chooses to offer them.

The cost of providing non-reimbursable alternate meals must be covered using non-Federal funds. If the SFA charges a child for a non-reimbursable alternate meal, then the meal is subject to the Smart Snacks requirements (7 CFR 210.11) and the requirements for revenue from non-program foods (7 CFR 210.14(f)).

Reimbursable alternate meals, by contrast, are considered a program food and would be treated like a program food cost. The PLE requirements (7 CFR 210.14(e)) apply to reimbursable alternate meals served to children participating at the paid rate. Unless an SFA is providing a large number of reimbursable alternate meals at a very low cost (or no cost) to children eligible for paid meals, FNS would not expect the provision of reimbursable alternate meals to impact the PLE calculation.

21. *[Revised]* Are SFAs opting to provide alternate meals to children with unpaid meal charges required to accommodate children with disabilities?

Yes. SFAs must ensure children with disabilities have access to the same benefits and services provided to other children. SFAs opting to provide alternate meals to children with unpaid meal charges must ensure children with disabilities have access to an alternate meal that is safe to consume, and must provide a modified alternate when necessary to accommodate a child's disability. For example, if an SFA provides children with unpaid meal charges an alternate meal that includes a peanut butter sandwich, a child with a peanut allergy would require a modified alternate meal.

If an SFA limits the availability of alternate meals, or does not provide reimbursable or alternate meals to children with unpaid meal charges, the SFA must consult with the LEA's Section 504 Coordinator before denying children with disabilities a meal. Schools are reminded that they may have additional obligations to children with disabilities under Federal law, beyond the scope of FNS guidance.

For more information, see: SP 59-2016: *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs,* September 27, 2016, http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs.

DEBT COLLECTIONS

22. What should State agencies and SFAs consider when developing a policy regarding the collection of delinquent debt arising from unpaid meal charges?

In establishing policies regarding collection of delinquent debt, State agencies and SFAs should ensure their efforts do not have a negative impact on the children involved, and instead focus primarily on adults in the household responsible for providing funds for meal purchases. State agencies and SFAs also are encouraged to consider whether the benefits of potential collections outweigh the costs which would be incurred to achieve those collections. Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy, which is required for SFAs no later than July 1, 2017.

23. At what point are unpaid meal charges classified as "delinquent debt"?

Unpaid meal charges are considered "delinquent debt" when payment is overdue as defined by State or local policies. The debt is classified as delinquent as long as it is considered collectable and efforts are being made to collect it. SFAs must make reasonable efforts to collect unpaid meal charges classified as delinquent debt; the cost of such collection efforts is an allowable use of NSFSA funds. A debt owed to the NSFSA remains on the accounting documents until it is either collected or is determined to be uncollectable and written off. For more information, see SP 47-2016: *Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments*, July 8, 2016, http://www.fns.usda.gov/unpaid-meal-charges-clarification-collection-delinquent-meal-payments.

24. May unpaid meal charge debt be carried over into a new school year?

Yes. Unpaid meal charges may be carried over at the end of the school year (i.e., beyond June 30) meaning collection efforts may continue into the new school year. This allows SFAs to work with individual families to establish longer repayment plans and to continue pursuing collection efforts when children change schools within the district or move to a new school outside the district.

25. At what point is delinquent debt considered "bad debt"?

When local officials determine further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." Once a delinquent debt is reclassified as a bad debt, it must be written off as an operating loss. NSFSA resources may not be used to cover costs related to the bad debt, such as continued legal and collection costs. Instead, these losses must be restored using non-Federal funds. These funds may come from the school district's general fund, special funding from State or local governments, or any other non-Federal sources.

26. What non-Federal funding sources may be used to restore operating losses from bad debts?

Allowable sources of non-Federal revenue include:

- State revenue matching funds in excess of the State revenue matching fund requirement,
- State or local funds provided to cover the price of student meals,
- Local contributions provided by community organizations or individuals,
- Revenue from adult meals prepared using resources outside the food service and not funded through the NSFSA,
- À la carte revenue and profit from foods not purchased using funds from the NSFSA and funded from an account separate from the NSFSA, and
- Revenue from catering or contracting services that operate using an account separate from the NSFSA.

If a revenue source is funded through NSFSA, then all revenue from the source must return to the NSFSA and may not be used to cover operating losses resulting from bad debts.

27. What are the requirements for SFAs using revenue from catering, vending, and other contracting services to restore operating losses?

In arrangements where school food service labor is used to prepare goods for an outside entity (e.g., catering and vending), the school food service must ensure all costs are covered by the entity served by the school food service operations. For example, an SFA may use NSFSA funds to purchase and prepare hamburgers for a Parent Teacher Association (PTA) that runs a high school concession stand during football games. In this example, if the cost associated with purchasing and preparing the hamburgers is $2 per hamburger, the SFA must recoup at least $2 per hamburger from the PTA; the PTA then may sell each hamburger for $3 and keep the $1 profit per burger.

When entering into arrangements with outside entities, the school food service is best served having an agreement in place regarding costs and all other terms and conditions, including a stipulation that all risk relating to revenue losses must be covered by the outside entity and not the NSFSA. For more information, see SP 13-2014: *School Food Service Account Revenue from the Sale of Non-Program Foods*, December 12, 2013, http://www.fns.usda.gov/school-food-service-account-revenue-sale-nonprogram-foods and SP 20-2016: *Nonprofit School Food Service Account Nonprogram Food Revenue Requirements*, December 23, 2015, http://www.fns.usda.gov/nonprofit-school-food-service-account-nonprogram-food-revenue-requirements.

28. Are revenues from the sale of competitive foods purchased using the general fund also restricted?

Revenue earned from the sale of competitive foods purchased with funds outside of the NSFSA (i.e., the general fund) may be used to cover bad debt.

29. If a child has money to purchase a meal but has outstanding meal charge debt, can the SFA require repayment and refuse to provide the child a meal?

No. If a child has money to purchase a reduced price or paid meal at the time of the meal service, the child must be provided a meal. SFAs may not use the child's money to repay previously unpaid charges if the child intended to use the money to purchase that day's meal.

30. Are SFAs required to maintain records related to bad debt?

Yes. According to SP 47-2016, once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 CFR 210.9(b)(17) and 7 CFR 210.15(b).

Types of records that should be maintained to document establishment and handling of bad debt include:

- Evidence of efforts to collect unpaid meal charges in accordance with the policy,
- Evidence that collection efforts fell within the timeframe and methods established by the policy,
- Financial documentation showing when the unpaid meal charge became an operating loss. and
- Evidence that the funds written off as bad debt were restored to NSFSA from non-Federal sources.

Unpaid Meal Charges: clarification

Can be found here: http://doe.sd.gov/cans/documents/SP47-2016-UPM.pdf

USDA United States Department of Agriculture

Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
VA 22302

DATE: July 8, 2016

MEMO CODE: SP 47-2016

SUBJECT: Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments

TO: Regional Directors
Child Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

The Food and Nutrition Service (FNS) recognizes that meal charge policies and delinquent accounts are important issues for school food authorities (SFAs), schools, students, and their families. It is very difficult for school food service professionals to see a hungry child in the cafeteria without the funds needed to pay for a meal. Further, unpaid meal charges can create challenges for schools because they rely on student payments, in addition to Federal reimbursements, to provide healthy, appealing, and affordable meals to all students.

There has been confusion about how unpaid meal charges must be handled when all collection efforts have been exhausted. To help address these situations, this memorandum clarifies the processes of designating delinquent debt that has been determined to be uncollectable as bad debt and obtaining assistance to offset bad debt losses. Additionally, this memorandum clarifies how Federal Government regulations and the U.S. Department of Agriculture (USDA) definition of "bad debt" apply to the nonprofit school food service account (NSFSA) when unpaid meal charges are not collected.

Delinquent Debt

Unpaid meal charges, like any other money owed to the NSFSA, are considered "delinquent debt" when payment is overdue, as defined by State or local policies. The debt is classified as delinquent as long as it is considered collectable and efforts are being made to collect it. A debt owed to the NSFSA (i.e., an account receivable) is an asset. As such, the debt remains on the accounting documents until it is either collected or is determined to be uncollectable and written off.

Unpaid meal charges may be carried over at the end of the school year (i.e., beyond June 30) as a delinquent debt and collection efforts may continue into the new school

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year. This allows SFAs to work with families to establish longer repayment plans and to continue pursuing collection efforts when students change schools in the district or move outside the district.

SFAs must make reasonable efforts to collect unpaid meal charges classified as delinquent debt and the cost of these efforts is an allowable use of NSFSA funds. A reasonable timeframe and methods for collecting unpaid meal charges can be established either at the State or SFA level. The Federal Government does not define "reasonable" collection methods or regulate how long a debt may be considered delinquent. Instead, FNS expects SFAs to rely on State and local policies for such determinations.

In establishing policies regarding collection of delinquent debt, State agencies and SFAs should ensure that efforts do not have a negative impact on the children involved, but focus primarily on the parents or guardians responsible for providing funds for meal purchases. State agencies and SFAs also are encouraged to consider whether the benefits of potential collections outweigh the costs which would be incurred to achieve those collections. Policies regarding the collection of unpaid meal charges should be included in the written meal charge policy that is required of all SFAs participating in the Federal school meal programs no later than July 1, 2017 (see SP-46, *Local Meal Charge Policies*, July 8, 2016).

Bad Debt

When local officials determine that further collection efforts for delinquent debt are useless or too costly, the debt must be reclassified as "bad debt." Federal Regulations at 2 CFR 200.426 define bad debts as "debts which have been determined to be uncollectable…." Debts are considered assets because they represent money due to the NSFSA. However, once a delinquent debt is reclassified as a bad debt it is no longer considered an asset because it is, by definition, uncollectable. Therefore, bad debts must be written off as operating losses.

National School Lunch Program (NSLP) and School Breakfast Program (SBP) regulations require SFAs to "comply with the requirements to account for all revenues and expenditures of [its] nonprofit school food service" and to "meet the requirements for the allowability of nonprofit school food service expenditures in accordance with this part and 2 CFR 200, Subpart E" [7 CFR 210.19(a)(1) and 7 CFR 220.13(i)]. Therefore, expenditures from the NSFSA must meet the standards for allowable costs set out in the Federal cost principles at 2 CFR Part 200, Subpart E.

Section 200.426 of Subpart E states that "Bad debts…arising from uncollectable accounts and other claims, are unallowable. Related collection costs, and related legal costs, arising from such debts after they have been determined to be uncollectable are also unallowable." Therefore, NSFSA resources may not be used to cover costs related to the bad debt, such as continued legal and collection costs.

Additionally, while bad debt must be written off as an operating loss, this particular operating loss may not be absorbed by the NSFSA, but must be restored using non-Federal funds. These funds may come from the school district's general fund, special funding from State or local governments, school or community organizations, or any other non-Federal sources. Once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 CFR 210.9(b)(17) and 7 CFR 210.15(b).

Additional Resources

FNS is currently developing resources State agencies and SFAs can use in their effort to create effective meal charge and delinquent account policies. These resources are intended to provide a variety of strategies to use as a starting point for establishing policies that meet State and local needs. These resources will be made available on the school meal programs website (http://www.fns.usda.gov/school-meals/child-nutrition-programs) in 2016 and will include:

- A handbook summarizing best practices that FNS collected from State agencies, SFAs, schools, and other key stakeholders;
- Webinars sharing ideas and strategies submitted by local-level officials; and
- Other relevant policy memoranda and guidance documents developed by FNS.

State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Original Signed

Cynthia Long
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