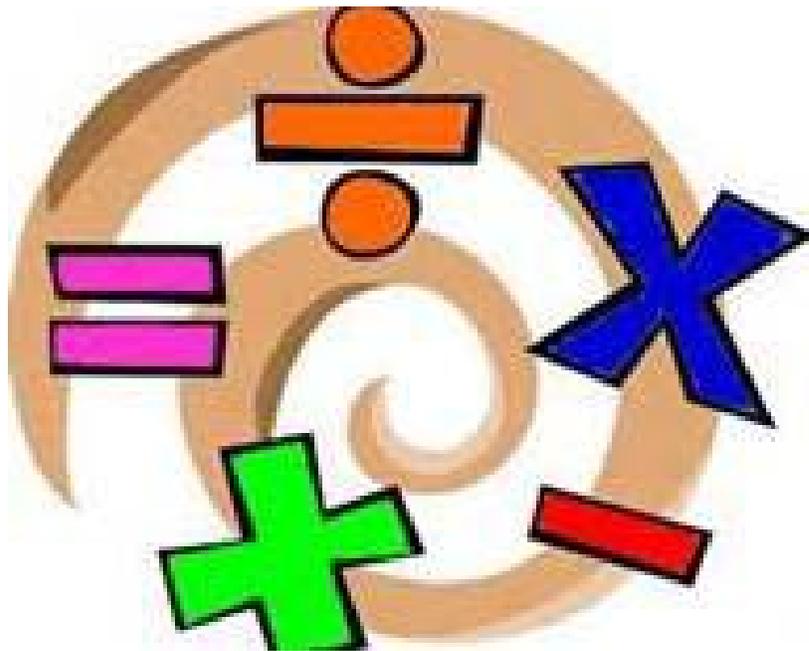


# Compliance Section



# **COMPLIANCE SECTION TABLE OF CONTENTS**

<b>Consultant Territories .....</b>	<b>C-3</b>
<b>Reimbursement Rates .....</b>	<b>C-4</b>
<b>Reporting Dates Checklist .....</b>	<b>C-5</b>
<b>List of Child Nutrition and Related Acronyms .....</b>	<b>C-6</b>
<b>After-School Snack Program (ASSP) .....</b>	<b>C-7</b>
<b>Charter School Procedures for Child Nutrition Programs (CNP) .....</b>	<b>C-17</b>
<b>Civil Rights .....</b>	<b>C-19</b>
<b>Financial Management .....</b>	<b>C-25</b>
<b>Fresh Fruit and Vegetable Program (FFVP) .....</b>	<b>C-61</b>
<b>Healthy School Environment (Wellness Policy) .....</b>	<b>C-63</b>
<b>Meal-Counting and Meal-Claiming Procedures .....</b>	<b>C-81</b>
<b>Special Milk Program (SMP) .....</b>	<b>C-111</b>
<b>Staffing Standards .....</b>	<b>C-113</b>
<b>Student Issues .....</b>	<b>C-117</b>
<b>Summer Meal Availability .....</b>	<b>C-129</b>
<b>Residential Child Care Institutions (RCCI) Additional Requirements .....</b>	<b>C-135</b>
<b>Compliance Section Index .....</b>	<b>C-149</b>

## CONSULTANT TERRITORIES

*Area consultants are available to provide technical assistance to school food authorities (SFAs). Following is a list of the area consultants, assigned counties, and telephone numbers where the consultants may be reached.*

<b>PATRICIA BEUTLER</b> 405-219-9015  Patricia.Beutler@sde.ok.gov	Blaine Kingfisher Logan Oklahoma (1/4)	<b>NANCY McCULLOUGH</b> 405-248-7840  Nancy.McCullough@sde.ok.gov	Caddo Comanche (1/2) Grady McClain
<b>DARREN BLANCHARD</b> 405-219-9637  Darren.Blanchard@sde.ok.gov	Creek Tulsa (1/2)	<b>RACHEL MCDANIEL</b> 405-248-8365  Rachel.McDaniel@sde.ok.gov	Coal Garvin Hughes Murray Okfuskee Pontotoc Seminole
<b>JERI BUCHANAN</b> 405-246-8342  Jeri.Buchanan@sde.ok.gov	Beckham Comanche (1/2) Cotton Greer Harmon Jackson Jefferson Kiowa Roger Mills Tillman Washita	<b>KENDRA MERVELDT</b> 405-249-7918  Kendra.Merveldt@sde.ok.gov	Oklahoma (1/4) Pottawatomie
<b>ALBERTA BURGESS</b> 405-213-8327  Alberta.Burgess@sde.ok.gov	Craig Delaware Mayes Ottawa Rogers Wagoner	<b>KRISTEN MILLER</b> 405-249-0274  Kristen.Miller@sde.ok.gov	Kay Lincoln Noble Osage Pawnee Payne
<b>TAMMY FLUTE</b> 405-249-0964  Tammy.Flute@sde.ok.gov	Adair Haskell Latimer Pittsburg Sequoyah	<b>JENNIFER WEBER</b> 405-301-7838  Jennifer.Weber@sde.ok.gov	Canadian Oklahoma (1/4)
<b>SHELLY FOX</b> 405-246-5985  Shelly.Fox@sde.ok.gov	Cleveland Oklahoma (1/4)	<b>FONDI WESEVICH</b> 405-306-0736  Fondi.Wesevich@sde.ok.gov	Nowata Tulsa (1/2) Washington
<b>PAT GOWER</b> 405-246-5648  Pat.Gower@sde.ok.gov	Cherokee McIntosh Muskogee Okmulgee	<b>DENISE WIELAND</b> 405-301-5786  Denise.Wieland@sde.ok.gov	Alfalfa Beaver Cimarron Custer Dewey Ellis Garfield Grant Harper Major Texas Woods Woodward
<b>KAREN JOHN</b> 405-301-7689  Karen.John@sde.ok.gov	Bryan Carter Johnston Love Marshall Stephens		
<b>JILLLOWE</b> 405-239-0598  Jill.Lowe@sde.ok.gov	Atoka Choctaw LeFlore McCurtain Pushmataha		

State Agency Telephone Number: 405-521-3327  
State Agency Fax Number: 405-521-2239

**REIMBURSEMENT RATES  
SCHOOL BREAKFAST PROGRAM (SBP),  
NATIONAL SCHOOL LUNCH PROGRAM (NSLP),  
SPECIAL MILK PROGRAM (SMP), AND  
AFTER-SCHOOL SNACK PROGRAM (ASSP)**

The United States Department of Agriculture (USDA) has announced the Child Nutrition Programs' (CNP) reimbursement rates. Reimbursement rates are revised annually to account for changes in the Consumer Price Index (CPI). The following rates are effective **July 1, 2014**.

Reimbursable Lunches Served to Students		SFAs that served 60 percent or more of their lunches free or at a reduced price in second preceding school year (2012-2013)
Free Lunches	\$ 2.98	\$ 3.00
Reduced-Price Lunches	2.58	2.60
Full-Price Lunches	.28	.30

**Additional Incentive Payment for Lunch Meals (\$.06) *Note: The above rates do not include the additional 6 cents at lunch.***

Reimbursable Breakfasts Served to Students	
Free Breakfasts	\$ 1.62
Reduced-Price Breakfasts	1.32
Full-Price Breakfasts	.28

Commodities Per Student Lunch \$.2475 + .0450 = \$.2925

**NOTE: Because Section 6(e) of the Richard B Russell National School Lunch Act (NSLA) requires that the value of USDA Food (commodity) assistance for schools is not less than 12 percent of all federal assistance provided under Sections 4, 6, and 11 of the NSLA each school year (SY), USDA has added an additional \$.0450 to the 2015 Commodity Meal Rate to include the shortfall in USDA purchases for the 2014 school year. This increase only applies to National School Lunch Program (NSLP) meals.**

Severe Need Breakfasts <sup>1</sup>		School sites within a district that served 40 percent or more of their lunches free or at a reduced price in the second preceding year (2012-2013)
Free Breakfasts	\$ 1.93	
Reduced-Price Breakfasts	1.63	
Full-Price Breakfasts	.28	

Special Milk Program <sup>2</sup>		
Nonpricing Program	\$ .2300	per half-pint served
Option 1 Pricing Program	NA	per full-price half-pint served and average cost of free half-pint served
Option 2 Pricing Program	.2300	per half-pint served

After-School Snack Program	
Free Snack	\$ .82
Reduced-Price Snack	.41
Full-Price <i>Not Eligible</i> Snack	.07

## REPORTING DATES CHECKLIST

The following reports are to be submitted electronically to the State Department of Education, hereinafter referred to as the *State Agency*, on or before the denoted date of each year.

Date Due	Report	Date Submitted
After August 2	Direct Certification Is Accessible Online at <https://thewave.sde.ok.gov> SFAs must do direct certification at least 3 times annually	_____
Prior to Submitting First Claim for Year	Renewal Application, Agreement, Policy Statement, and Changes to the Permanent Policy Statement—eClaims	_____
Due With Renewal	Student Paid Lunch Prices by site	_____
Twice Per Year	With On-Site Reviews of ASSP Sites	_____
Tenth of Each Month	Monthly Claim for Reimbursement—eClaims	_____
Fifteenth of Each Month	Monthly Claim for Reimbursement—Fresh Fruit and Vegetable Program	_____
August 1 Each Year (If Applicable)	Provision 1, 2, or 3 Application (Only for sites participating) <b>(Call 405-521-3327 for a copy of the application)</b>	_____
Before September Claim May Be Submitted	Food Safety Inspection Report—eClaims	_____
October 1	Verification Process to Begin	_____
After October Claim Has Been Processed, No Later Than November 21	Low-Income Student Count Report (Must be completed prior to submission of November claim)—eClaims	_____
November 15	Verification Process to Be Completed	_____
Before December Claim May Be Submitted	Verification Report—eClaims	_____
March	Registration for Summer Food Service Program Training	_____
Before March Claim May Be Submitted	Paid Lunch Equity Tool	_____
April 15	Application for Fresh Fruit and Vegetable Program—eClaims	_____
April 15	Application for Summer Food Service Program	_____
May 15	Seamless Summer Option Application Due	_____
August 31	Community Eligibility Provision Application Certified	_____

<b>The following reports must be completed and maintained in SFA files.</b>		
<b>October 31</b> <b>February 1 of Each Year</b>	<b>Civil Rights Compliance Checklist: page C-21</b> <b>On-Site Review (Only for sites with more than one eating site; a review must be completed for each site): page C-101</b>	<input type="checkbox"/> <input type="checkbox"/>
<b>Twice Annually</b>	<b>On-Site Review for After-School Snacks (Only for sites participating): page C-16</b>	<input type="checkbox"/>

## LIST OF CHILD NUTRITION AND RELATED ACRONYMS

ADA	Average Daily Attendance	LEA	Local Education Agency
ADM	Average Daily Membership	LWP	Local Wellness Policy
AF	Attendance Factor	NCLB	No Child Left Behind
ANSMP	Assisted Nutrient Standard Menu Planning	NET	Nutrition Education and Training
AR	Administrative Review	NFSMI	National Food Service Management Institute
ASSP	After-School Snack Program	NSLA	National School Lunch Act
CACFP	Child and Adult Care Food Program	NSLP	National School Lunch Program
CEP	Community Eligibility Provision	NSMP	Nutrient Standard Menu Planning
CFDA	Catalog of Federal Domestic Assistance	OCAS	Oklahoma Cost Accounting System
CN	Child Nutrition	OMB	Office of Management and Budget
CNA	Child Nutrition Act	PLE	Paid Lunch Equity
CNP	Child Nutrition Programs	RCCI	Residential Child Care Institution
CPI	Consumer Price Index	RDA	Recommended Dietary Allowance
DGA	Dietary Guidelines for Americans	RFP	Request for Proposal
DHS	Department of Human Services	SA	State Agency (also known as the State Department of Education)
DoD	Department of Defense	SBP	School Breakfast Program
EC	Early Childhood	SDE	State Department of Education (also known as the <i>State Agency</i> )
EPA	Environmental Protection Agency	SFA	School Food Authority
FDA	Food and Drug Administration	SFSA	School Food Service Account
FDPIR	Food Distribution Program on Indian Reservations	SFSP	Summer Food Service Program for Children
FFVP	Fresh Fruit and Vegetable Program	SMP	Special Milk Program
FMNV	Foods of Minimal Nutritional Value	SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamp)
FNS	Food and Nutrition Service (USDA)	SNB	Severe Need Breakfast
FSIS	Food Safety and Inspection Service (USDA)	SOP	Standard Operating Procedures
FSMC	Food Service Management Company	TANF	Temporary Assistance to Needy Families
FY	Fiscal Year	USDA	United States Department of Agriculture
HACCP	Hazard Analysis of Critical Control Points (USDA)	WIC	Special Supplemental Nutrition Program for Women, Infants, and Children
HUSSC	HealthierUS School Challenge		
IEG	Income-Eligibility Guidelines		
IEP	Individual Educational Plan		
ITB	Invitation to Bid		

### INTERACTIVE FORMS ON e-CLAIMS

C-41	PLE Nonfederal Source Funds
C-55	OCAS Expenditure Worksheet
C-57	Average Adult Meal Cost vs Actual Adult Meal Charge
C-97	Edit Check Worksheet
C-109	CEP Calculator
E-67	Free/Reduced Application
E-73	Notice of Approval/Denial of Benefits
E-81	Direct Certification Notice
CM-60	Recipe Form
CM-61	Recipe Analysis
CM-67	Food Production Record
CM-71	Salad Bar Production Record
CM-133	Inventory Record
	PLE Tool
	Smart Snack Calculator
	Permanent Policy Statement
	Meal Pattern Certification Form

## AFTER-SCHOOL SNACK PROGRAM (ASSP)

Sections 107 and 108 of Public Law 105-336 (the Child Nutrition Reauthorization Act of 1998) authorizes reimbursement for snacks served to children through the age of 18 (and to individuals, regardless of age, who are determined by the State Department of Education [the *State Agency*] to be mentally or physically disabled) who participate in programs organized to provide after-school care. The intent is to assist sites in operating organized programs of care which include education or enrichment activities known to help reduce or prevent children's involvement in juvenile crime or other high-risk behavior. (Reference 2000-CN-04)

### A. Eligible Programs

To be eligible to qualify for reimbursement under the National School Lunch Program (NSLP), after-school care programs must meet the following criteria:

1. They must be run by a site that is participating in the NSLP.
2. The purpose of these programs must be to provide care in after-school settings. This does not mean that the programs must offer formal child care as recognized by a licensing authority. There is no federal requirement for after-school care sites operating under this provision to have either federal, state, or local licensing or approval as a condition of eligibility. However, to qualify under this provision, these programs must be organized to provide children with regularly scheduled activities in a setting that is structured and supervised. By ***regularly scheduled***, it is not meant that the program must occur daily. Moreover, while eligible programs would not need to establish formal enrollment procedures, they must have a means of determining that children are present on a given day, such as a roster or sign-in sheet.
3. Eligible programs must include education or enrichment activities in organized, structured, and supervised environments. It must be stressed that any extracurricular activities such as the school choir, debate team, or drama society ***CAN*** qualify to participate under this provision ***only if*** their basic purpose is to provide after-school care as defined above.

It must be emphasized that ***under no circumstances*** can organized athletic programs engaged in interscholastic sports be approved as after-school care programs under this provision. In the Conference Report that accompanied Public Law 105-336, the Conference Committee declared its intent that support under this provision would not be provided to members of athletic teams. However, while athletic teams participating in interscholastic sports programs may not be approved, programs which include supervised athletic activity along with education or enrichment activities may participate. ***The key would be that they are open to all and do not limit membership for reasons other than space or security considerations or, where applicable, licensing requirements.***

### B. Oversight

Any site that is operating the NSLP may be reimbursed for snacks served to eligible children in eligible after-school care programs. While the ASSP must be sponsored or operated by a school food authority (SFA), this does not mean that the SFA must carry out the day-to-day management of the program. For example, the Parent-Teacher Association (PTA) or Young Men Christian's Association (YMCA) could operate the program under an arrangement with the site. However, the SFA must retain final administrative and management responsibility for the snack service. Furthermore, the SFA for the school must be the party that enters into the agreement with the State Agency and must assume full responsibility for meeting all program requirements.

### C. Reimbursement

Under this provision, sites may claim reimbursement for one snack, per child, per day. Children are eligible to participate through the age of 18, and if a student's nineteenth birthday occurs during the school year, reimbursement may be claimed for snacks served to that student during the remainder of the school year. Reimbursement may also be claimed for individuals, regardless of age, who are determined by the State Agency to be mentally or physically disabled.

After-school programs operated by a school at a site in which **at least 50 percent of the enrolled children (based on the previous October site data)** are certified eligible for free or reduced-price meals. The school then receives reimbursement at the free rate. Sites which are not in areas served by a site in which at least 50 percent of the enrolled children are certified eligible for free or reduced-price meals must count meals and claim reimbursement by type (free, reduced-price, and full-price) and must have documentation of eligibility for all meals served free or at a reduced price. Under no circumstances may a site charge children for snacks claimed at the free reimbursement rate. Charges for reduced-price snacks may not exceed 15 cents, as stipulated in 7 CFR §210.9(c)(4). The eClaims system will automatically display the ASSP claim for reimbursement for any SFA approved.

### D. Times of Operation

1. This change in the law applies **ONLY** to programs that provide care for children after their school day has ended. Under no circumstances may snacks be reimbursed in programs operated before or during the child's school day except when a school site is implementing an expanded learning time program.\* (Reference USDA Policy Memo SP-04-2011) Sites **MUST** be in session during the day for an after-school snack to be served. If a school participates in the NSLP during the school year, the site **does not** necessarily need to be participating in the NSLP during summer school to be able to claim snacks served in an ASSP. Sites are not eligible to receive reimbursement under this provision for snacks on weekends or holidays, including vacation periods, with one exception: if school, which is an integral part of the curriculum or an extension of the local educational program, is in session, snacks may be served at the end of the school day; i.e., Saturday school is in session to make up for days missed because of inclement weather. **This means snacks can be claimed only if served on educational days (after the school day has ended) that are counted as part of the accreditation requirement, whether or not the breakfast and/or lunch meals are served.** Refer to USDA Policy Memo 2000-CN-04.
2. However, a child's eligibility is based on when **his or her** scheduled school day ends and not on whether or not the site continues in session. For example, if a kindergarten program ends at noon but the children remain in school under a care program, snacks served to these children may be reimbursed under this provision. The same would be true for older children enrolled in sites that have split sessions. If children enrolled in the early session remain on campus to participate in an approved after-school care program, they may receive reimbursable snacks even though the site continues to operate a later academic session.

\* The ASSP was established to support afternoon programs with educational and enrichment activities for children in the late afternoon or evening when they might otherwise be unsupervised and engage in risky behaviors. USDA regulations define after-school care programs as those *providing organized care to enrolled school-age children after school hours for the purpose of care and supervision of children* (7 CFR 210.2 and 226.17A[b]). Recently, educational programs aimed at serving at-risk children have evolved to include schools operating expanded learning times longer than the traditional school day. *Expanded learning time* is a common term used in the educational area to describe schools or school districts that add significantly more school time for academic and enrichment opportunities to improve student achievement.

Therefore, a school operating longer than the traditional school day may be eligible for after-school snack reimbursement through NSLP, provided that it operates a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located.

3. An RCCI may participate in the After-School Snack Program (ASSP) in the same manner as a regular school district. The snack service would not be in place of the evening meal, but in addition to the evening meal. The snack can be served either before or after the supper meal. (Reference USDA Policy Memo 2000-CN-04)

#### E. Content of Snacks

Snacks served under this provision must meet the meal pattern for snacks set forth in 7 CFR §210.10(a)(ii) and §210.10(n). Both snack components in the quantities required must be served to each student. ***Snacks cannot be taken off-site for consumption. (Reference 7 CFR §210.7[d])*** Portions for children aged 13 through 18 shall be not less than the portions stipulated for children aged 6 through 12. In fact, it is recommended that sites offer larger portions for older children (aged 13 through 18), based on their greater food energy requirements. ***This means that Offer versus Serve is not an allowable option.***

#### F. Record Keeping

It is the intention of the law to keep any record-keeping burden to the minimum necessary to ensure that federal reimbursement is properly paid. At a minimum, SFAs participating under this provision must maintain the following records for the time periods required in 7 CFR §210.23(c):

1. Documentation that the site is located in an area served by a site in which at least 50 percent of the enrolled students are certified eligible for free or reduced-price meals (if all snacks are claimed free).
2. Documentation of free and reduced-price eligibility for all children for whom free and reduced-price snacks are claimed (for all other sites).
3. Documentation of an individual child's attendance/participation on a daily basis.
  - a. For school sites that must claim categorical counts (sites that are less than 50 percent free and reduced-price):
    - (1) The snack attendance/meal count record must show each child in attendance and whether a meal was served.
    - (2) Each child in attendance that was served a meal must then be placed in the proper category.
  - b. For school sites that are not required to claim categorical counts (sites that are more than 50 percent free and reduced-price): The record must indicate when a child in attendance received a meal.
4. Food production records indicating components and quantities of food prepared.
5. **On-Site Reviews:** Review each ASSP two times a year; the first review shall be made during the first four weeks that the school is in operation each school year, except that an ASSP operating year-round shall be reviewed during the first four weeks of its initial year of operation, once more during its first year of operation, and twice each school year thereafter. (Reference 7 CFR §201.9[c][7])

## MINIMUM MEAL REQUIREMENTS FOR SNACKS UNDER THE NATIONAL SCHOOL LUNCH PROGRAM (NSLP)

When the meal pattern is properly used, the meals will include foods which supply needed nutrients and energy. The nutritional goal for meals and snacks is to furnish high-quality meals to all students in accordance with the Recommended Daily Dietary Allowance of the National Research Council/National Academy of Sciences.

SNACK (Choose two of the following components)	Children Ages 1 Through 2 Years	Children Ages 3 Through 5 Years	Children Ages 6 Through 18 Years
<b>Milk<sup>1</sup></b>			
Milk, fluid	1/2 cup	1/2 cup	1 cup
<b>Vegetables and Fruits<sup>2</sup></b>			
Vegetable(s), fruit(s), full-strength juice <sup>9</sup>	1/2 cup	1/2 cup	3/4 cup
<b>Bread and Bread Alternates<sup>3</sup></b>			
Enriched or whole-grain bread	1/2 serving	1/2 serving	1 serving
Cereal (cold, dry)	1/4 cup or 1/3 oz <sup>4</sup>	1/3 cup or 1/2 oz <sup>4</sup>	3/4 cup or 1 oz <sup>4</sup>
Cooked pasta or noodle products	1/4 cup	1/4 cup	1/2 cup
Cooked cereal or cereal grains	1/4 cup	1/4 cup	1/2 cup
<b>Nonsweet snack products<sup>11</sup></b>	<b>1/2 serving</b>	<b>1/2 serving</b>	<b>1 serving</b>
<b>Meat and Meat Alternates<sup>5</sup></b>			
Lean meat, poultry, or fish <sup>6</sup>	1/2 oz	1/2 oz	1 oz
Cheese	1/2 oz	1/2 oz	1 oz
Eggs	1/2 egg	1/2 egg	1/2 egg
Cooked dry beans or peas <sup>7</sup>	1/8 cup	1/8 cup	1/4 cup
Peanut butter, soynut butter, or other nut or seed butters	1 Tbsp	1 Tbsp	2 Tbsp
Peanuts, soynuts, or tree nuts or seeds <sup>8</sup>	1/2 oz	1/2 oz	1 oz
Yogurt, plain or flavored, unsweetened or sweetened <sup>10</sup>	2 oz or 1/4 cup	2 oz or 1/4 cup	4 oz or 1/2 cup

<sup>1</sup> Must offer pasteurized milk in at least two choices from the following: fat-free milk, unflavored or flavored; lowfat (1%) milk, unflavored; fat-free or lowfat lactose-reduced milk; fat-free or lowfat lactose-free milk; fat-free or lowfat buttermilk; and fat-free or lowfat acidified milk. Such products must be pasteurized fluid milk that meets state and local standards.

<sup>2</sup> Or an equivalent quantity of any combination of vegetable(s), fruit(s), and juice.

<sup>3</sup> Or an equivalent quantity of any combination of bread/bread alternate.

<sup>4</sup> Either volume (cup) or weight (ounce), whichever is less.

<sup>5</sup> Or an equivalent quantity of any combination of meat/meat alternate.

<sup>6</sup> Cooked lean meat without bone.

<sup>7</sup> May be used as the meat alternate or as part of the vegetable/fruit component, but not as both components in the same meal.

<sup>8</sup> Tree nuts and seeds that may be used as meat alternates are listed in program guidance.

<sup>9</sup> Juice may not be served when milk is served as the only other component.

<sup>10</sup> Applies to commercially prepared yogurt, lowfat yogurt, and nonfat yogurt. It does not apply to nonstandardized yogurt products such as frozen yogurt, yogurt-flavored products, yogurt bars, or yogurt-covered fruit or nuts. Commercial flavorings may be added, such as fruit, fruit juice, nuts, seeds, or granola, but they shall not be credited toward meeting the second food component requirement in the supplement.

<sup>11</sup> Includes such products as hard pretzels or chips made of whole-grain or enriched meal or flour.



# AFTER-SCHOOL SNACK PROGRAM MEAL COUNT WORKSHEET

Name of After-School Snack Site: \_\_\_\_\_

Month: \_\_\_\_\_ Year: \_\_\_\_\_

DATE	CATEGORICAL COUNT SITES ONLY				50% ELIGIBLE SITES ONLY
	FREE	REDUCED- PRICE	FULL- PRICE	TOTAL	
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					
29					
30					
31					
<b>TOTALS</b>					

## MENUS AS SERVED/FOOD PRODUCTION RECORD

Snack	Menu	Qty. Served: Meat/Meat Alternate	Qty. Served: Bread/Cereal	Qty. Served: Fruit/Veg./Juice	Qty. Served: Milk
<b>DATE:</b> _____ Total children served: _____ Number of children served: 1-2: _____ 3-5: _____ 6-18: _____ Adults: _____ Contract: _____					
<b>DATE:</b> _____ Total children served: _____ Number of children served: 1-2: _____ 3-5: _____ 6-18: _____ Adults: _____ Contract: _____					
<b>DATE:</b> _____ Total children served: _____ Number of children served: 1-2: _____ 3-5: _____ 6-18: _____ Adults: _____ Contract: _____					
<b>DATE:</b> _____ Total children served: _____ Number of children served: 1-2: _____ 3-5: _____ 6-18: _____ Adults: _____ Contract: _____					
<b>DATE:</b> _____ Total children served: _____ Number of children served: 1-2: _____ 3-5: _____ 6-18: _____ Adults: _____ Contract: _____					

**AFTER-SCHOOL SNACK  
MENUS AS SERVED/FOOD PRODUCTION RECORD**

**INSTRUCTIONS**

1. The snack menus are recorded on the menu-planning pages under the *Menu* column.
2. Each meal component being credited must be recorded in the proper component box.
3. Total quantities of food served from each meal component must be recorded. Remember to indicate package size, poundage, ounces, fresh, frozen, etc.
4. Remember to always record the following daily:
  - a. Date, including year
  - b. Total number of children served
  - c. Number of children served in each age group
  - d. Number of adults served
  - e. Number of contract snacks served
5. The menu-planning pages must be kept on-site at all times.
6. Maintain the menu-planning pages on a fiscal year basis beginning July 1 and ending on June 30 of each fiscal year.
7. Keep the menu-planning pages on file with all other CNP records at the close of the fiscal year.

Example:

Snack	Menu	Qty. Served: Meat/Meat Alternate	Qty. Served: Bread/Cereal	Qty. Served: Fruit/Veg./Juice	Qty. Served: Milk
<b>DATE:</b> <u>2/15/14</u> Total children served: <u>47</u> Number of children served: 1-2: _____ 3-5: _____ 6-18: <u>47</u> Adults: <u>0</u> Contract: <u>0</u>	<i>Fresh strawberries &amp; bananas Milk</i>			<i>8 1/2# strawberries 8 1/2# bananas</i>	<i>39 1/2-pints of fat-free chocolate milk 2 1/2-pints of 1% white milk</i>
<b>DATE:</b> <u>2/17/14</u> Total children served: <u>44</u> Number of children served: 1-2: _____ 3-5: _____ 6-18: <u>44</u> Adults: <u>0</u> Contract: <u>0</u>	<i>Assorted cold cereals Milk</i>		<i>44 1-oz boxes of assorted cereals</i>		<i>43 1/2-pints of 1% white milk 1 1/2-pint of fat-free chocolate milk</i>

# AFTER-SCHOOL SNACKS MENU\* EXAMPLE

Monday	Tuesday	Wednesday	Thursday	Friday
Sausage (1 oz) Biscuit (0.9 oz) Water	Fresh Vegetables (3/4 cup) Ranch Dressing, fat-free** Milk (8 oz) Variety	Chocolate Chip Granola Bar (2.2 oz) Milk (8 oz) Variety	Peanut Butter** Crackers (0.7 oz) 100% Fruit Juice (3/4 cup)	Bran Muffin (1.8 oz) Milk (8 oz) Variety
Breakfast Cereal (1 oz) Milk (8 oz) Variety	Tortilla Chips (0.9 oz) Salsa** Cheese (1 oz) Water	Grapes (21 large) Milk (8 oz) Variety	Oatmeal Raisin Cookie (2.2 oz) 100% Fruit Juice (3/4 cup)	Fish-shaped Crackers (0.7 oz) Milk (8 oz) Variety
Graham Cracker (0.9 oz) Milk (8 oz) Variety	Fig-filled Cookie (2.2 oz) Milk (8 oz) Variety	Apple, sliced (Medium) Yogurt (4 oz) Water	Animal Crackers (0.9 oz) 100% Fruit Juice (3/4 cup)	Carrot Sticks (9 1/2" x 4") Ranch Dip, fat-free** Milk (8 oz) Variety
Bread Stick (0.9 oz) Pizza Sauce** String Cheese (1 oz) Water	Cereal Bar (2.2 oz) Milk (8 oz) Variety	Applesauce (3/4 cup) Toaster Pastry, unfrosted (1.8 oz) Water	Cheese (1 oz) Saltine Crackers (0.7 oz) Water	Brownie (4 oz) Milk (8 oz) Variety
Orange 1 1/2 (Medium) Milk (8 oz) Variety	Soft Pretzel (0.9 oz) 100% Fruit Juice (3/4 cup)	Peaches, canned (3/4 cup) Milk (8 oz) Variety	Peanut Butter** Jelly** Bread (0.9 oz) Milk (8 oz) Variety	Pineapple Chunks (3/4 cup) Blueberry Muffin Square (1.8 oz) Water

**\*NOTE:** After-School Snack Program may use the Child and Adult Care Food Program (CACFP) Grains/Bread Chart. The above menu is based on the CACFP Grains/Breads Chart. This menu does not meet the definition of the new Smart Snack Rule.

\*\*Extra Food

**NOTE:** Milk variety includes fat-free chocolate and 1% white milk daily.

**AFTER-SCHOOL SNACK PROGRAM (ASSP)  
ON-SITE REVIEW**

**SITE:** \_\_\_\_\_ **YES** **NO** **N/A\***

**A. ATTENDANCE**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 1. Is an attendance list used in the meal count system?     | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Is attendance list updated as needed (at least daily)?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Is there an educational or enrichment component offered? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**B. MEAL COUNT RECORDING AND EDIT CHECKS**

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| 1. Are snacks served after the students' school day has ended?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Are all snacks consumed in their entirety on-site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Does the site use proper procedures for counting and recording snacks?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. For any day during the review month, does the number of snacks claimed exceed the daily attendance?                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Does the site have proper procedures to manage and safeguard cash (reconciliation, extra item sales, adult meals, etc.)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**C. MINIMUM MEAL PATTERN REQUIREMENTS**

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| 1. Do all snacks served include the required components (two of the four)?                                       | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Do all snacks served meet the quantity requirements for the age groups served?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Do all students receive both the required components in the correct quantities before the snacks are claimed? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 4. Are adequate food production records being maintained?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Are at least two choices of milk offered from the following?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
- Unflavored or flavored fat-free
  - Cultured buttermilk lowfat (1%) or fat-free
  - Unflavored lowfat (1%)
  - Acidified milk lowfat (1%) or fat-free
  - Lactose-reduced lowfat (1%) or fat-free
  - Lactose-free lowfat (1%) or fat-free

<b>FOR SITES NOT MEETING 50 PERCENT ELIGIBILITY ONLY</b>	<b>YES</b>	<b>NO</b>	<b>N/A*</b>
<b>D. APPLICATION APPROVAL</b>			
1. Are applications approved at the school? Responsible party: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Are applications on file correctly approved?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Do names on the attendance list match approved applications on file?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Are snacks made available free or at a reduced price to all students who are determined by the school food authority (SFA) to be eligible for such benefits?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>E. MEAL COUNT SYSTEM</b>			
1. Does the meal count system produce an accurate count of reimbursable snacks (free, reduced-price, full-price) served to eligible children?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. If students are charged for snacks, do the collection procedures in use match the approved collection procedures in the Policy Statement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If the meal count is not taken at the time the snack is served, does the school have a system to account for reimbursable snacks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does the meal count system prevent overt identification?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Is the medium of exchange made available to all students at the same location?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the medium of exchange used prohibit codes for identifying students as free, reduced-price, or full-price?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Comments (List any problems that need corrective action):**

Signature of Reviewer: \_\_\_\_\_ Date: \_\_\_\_\_

\*Not Applicable

## CHARTER SCHOOL PROCEDURES FOR CHILD NUTRITION PROGRAMS (CNP)

- A. A charter school is treated as its own local education agency (LEA) or school district for all Federal Programs, including Child Nutrition.
1. The charter school is assigned a county/district code. The charter school completes its own application/agreement/policy statement with the CNP Section of the State Agency.
  2. The charter school is responsible for the distribution and collection of the free/reduced-price applications, the approval of these applications, Direct Certification activity, and any issuance of benefits for the charter school students.
  3. The charter school is responsible for its own meals (self-operating) or can contract for its meal services:
    - a. Every meal claimed for reimbursement must meet minimum meal pattern requirements.
    - b. A charter school may contract its meals with a school district participating in the National School Lunch Program (NSLP)/School Breakfast Program (SBP) that *is not* under a food service management company (FSMC) contract—in this case, a simple contract (*National School Lunch/School Breakfast Programs Agreement to Furnish Food Service*) (see **page C-105**) can be used. The charter school is not obligated to bid this service competitively as long as the service is provided by a school district that is self-operating.
    - c. A charter school is not allowed to contract its meals/food services with a school district that is *NOT* participating in the NSLP/SBP unless these services are bid competitively. Further, a charter school is not allowed to contract its meals/food services with a school district that *IS* participating in the NSLP/SBP that *IS* under an FSMC contract. This would cause a *substantive* change to the FSMC contract that would require the school district to have to rebid its FSMC contract.
    - d. A charter school may contract its food service operations with an FSMC—in this case, the *Food Service Management Company (FSMC) Request for Proposal (RFP)/Contract* prototype must be used.
    - e. A charter school may contract for food delivery only (not preparation) with an outside entity—in this case, the National School Lunch/School Breakfast Programs Agreements to Furnish Food Service may be used. This service must be procured under federal procurement regulations.
  4. The charter school will collect all of its own meal counts and eligible counts each month to report on its own claim for reimbursement. The federal reimbursement from its claim will be deposited into whatever bank account the charter school has set up with the State Department of Education. However, all State Match funds will be deposited into the sponsor's account.
  5. The charter school is responsible for establishing and implementing the following policies and plans:
    - a. Wellness Policy
    - b. Hazard Analysis Critical Control Point (HACCP) Plan
    - c. Procurement Plan
  6. The charter school is responsible for the submission all CNP reports:
    - a. Claim for reimbursement
    - b. Food safety inspection report
    - c. Low-income report
    - d. Verification report

7. Economically disadvantaged data for the charter school LEA is collected on the claim for reimbursement and the Low-Income Report. This data is used in the calculation of State Aid, Title I, e-Rate, and grant formulas.

B. Additional Two-Cent Reimbursement

An LEA, in the second preceding year, that served 60 percent of its lunches to students who qualified for free or reduced-price meals will automatically receive an additional \$.02 for each lunch claimed. This means that a new charter LEA must be in its third year of participation before the additional reimbursement is paid.

C. Severe Need Breakfast (SNB)

Each site under a charter LEA *MAY* receive additional reimbursement for breakfast. A site, in the second preceding year, that served 40 percent of its lunches to students who qualified for free or reduced-price meals will receive additional funding for each breakfast claimed. This means a new charter school site must be in its third year of participation before it would qualify for the additional breakfast funding.

D. USDA Foods

Once a charter school LEA has been approved to participate in CNP for a full school year, the meal counts from that LEA will be sent to the Department of Human Services to determine the USDA Foods allocation for the *FOLLOWING* school year. This means that the charter LEA will participate in CNP for one year before USDA Foods are received. Once the charter school begins to receive USDA Foods, if it is contracting its meals with another school district, the charter school should allow the district to have the USDA Foods and the rate per *LUNCH* that the charter school is paying the district should be reduced by the USDA Foods rate.

E. Procurement

Because CNP funds are federal, charter schools must follow Federal Procurement Regulations when purchasing anything acquired with CNP funds.

F. About the CNP Section of the SDE

1. CNP staff:
  - a. State is divided into 16 territories.
  - b. Each territory has assigned to it a CNP consultant.
  - c. CNP area consultants are available for technical assistance at any time requested.
2. CNP staff conducts a review of each LEA.

G. Record Maintenance

1. All records pertaining to CNP must be maintained for a period of three years after the fiscal year has ended.
2. Records involved in a state or federal review or audit must be maintained until the review/audit issues are resolved.

## CIVIL RIGHTS

United States Department of Agriculture (USDA)/Food and Nutrition Service (FNS) Instruction 113-1 (dated 11/8/05) delineates the civil rights requirements for participants in Child Nutrition Programs (CNP). The following is required at the local school food authority (SFA) level.

### A. Public Information Responsibilities

1. Ensure that all forms of communication and printed program information that are disseminated include the following *nondiscrimination statement*.

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

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

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

USDA is an equal opportunity provider and employer.

***NOTE: If material is too small to permit the full statement, this institution is an equal opportunity provider and employer will be included at a minimum in print size no smaller than the text.***

2. Inform parents or guardians of students in sites participating in the CNP, as well as local minority and grassroots organizations, of the availability of program benefits and services, the nondiscrimination policy, and all significant changes in existing requirements that pertain to program eligibility and benefits.
3. Display in a prominent place, where meals are served, the nondiscrimination poster developed by USDA. The poster is required to measure 11 inches x 17 inches.
4. Make available to the public, and to participants and potential participants upon request, information about program requirements and the procedures for filing a complaint in English and/or in the appropriate translation to non-English-speaking persons.

### B. Data Collection

1. Develop a method for collection of data. Methods include determination of the information by a school official through observation, personal knowledge, or voluntary self-identification by an applicant on the Application for Free and Reduced-Price School Meals or the Application for Free Milk forms.
2. Maintain information on file for three years.

3. Establish procedures to ensure that the information is made available only to authorized state and federal personnel during reviews or as a part of federal- or state-approved surveys.
  - a. The nondiscrimination statement must be included on all of the forms that sites send to parents. The public release will satisfy the provisions of Item A2 (above).
  - b. A Civil Rights Compliance Checklist is included on **page C-21**. This checklist, which is to be completed by each school site by October 31 of each year and maintained by each SFA, furnishes an overview of the requirements.

#### C. Civil Rights Complaints

1. All written or verbal complaints alleging discrimination on the bases of race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income is derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by USDA, shall be processed within 90 days upon receipt in the manner prescribed by this instruction.
2. The Office of Minority Affairs (OMA) has been delegated the authority to determine the manner in which all civil rights complaints, investigations, preliminary inquiries, and compliance reviews are to be handled. Regardless of the administrative or operational level of the CNP where a civil rights complaint is filed, it must be forwarded in accordance with Item D2 (below) to the Director, Civil Rights (CR) Division, for submission to the OMA. The OMA will prepare and issue letters of acknowledgment to the complainant(s).
3. A preliminary inquiry or an investigation will be conducted on all valid complaints to substantiate or refute the allegations.

#### D. Procedure for Filing Complaints of Discrimination

1. **Right to File a Complaint:** Any person alleging discrimination based on race, color, national origin, age, disability, sex, gender identity, religion, reprisal, and where applicable, political beliefs, marital status, familial or parental status, sexual orientation, or all or part of an individual's income derived from any public assistance program, or protected genetic information in employment or in any program or activity conducted or funded by USDA, has a right to file a complaint **within 180 days** of the alleged discriminatory action. Under special circumstances, this time limit may be extended by OMA.
2. **Acceptance:** All complaints must be in writing and signed by the complainant. All complaints shall be accepted by the SFA, Oklahoma State Department of Education (the **State Agency**), or Food and Nutrition Service Regional Office (FNSRO). The complaints will be forwarded to the FNSRO (as applicable), and then forwarded at once to the CR Division. It is necessary that the information be sufficient to determine the identity of the agency or individual toward which the complaint is directed and to indicate the possibility of a violation. Please see a Civil Rights Complaint Form on **page C-22**. The person who has allegedly been discriminated against must complete and sign the form.

#### E. Required Staff Training

Annual training on civil rights is required for all SFA employees. Online training may be accessed through eClaims. Documentation with names of participants must be maintained at the SFA for all staff training.

**CIVIL RIGHTS COMPLIANCE CHECKLIST**  
**SCHOOL YEAR \_\_\_\_\_**

United States Department of Agriculture (USDA) regulations outline each site’s responsibility with regard to civil rights compliance in the Child Nutrition Programs (CNP). The following checklist furnishes a quick overview of requirements.

	YES	NO	N/A*
1. Does the letter to households include:			
a. The required nondiscrimination statement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Where a complaint may be filed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Is a USDA/Food and Nutrition Service (FNS)-approved poster displayed in a prominent place and visible to recipients?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Is the correct nondiscrimination statement included on appropriate program materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. Has the school food authority (SFA) sent out a public release to community/grassroots organizations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Are foreign language translations available when a significant number of persons speaking only a foreign language are in the population?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6. Are procedures established to receive complaints alleging discrimination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
a. Have there been any written or verbal complaints alleging discrimination?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. If <b>YES</b> , have these complaints been reported to the State Department of Education (the <b>State Agency</b> )?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Do admission procedures used restrict enrollment by minority persons?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Are incorrectly denied Applications for Free and Reduced-Price Meals disproportionately composed of minority applications?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Are disabled students provided program benefits as prescribed by regulations (including special dietary needs), as appropriate?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\*Not Applicable

**Ethnicity:**

- Hispanic or Latino
- Not Hispanic or Latino

**TOTAL STUDENTS BY ETHNICITY**

**Race:**

- American Indian or Alaska Native
- Asian
- Black or African American
- Native Hawaiian or Other Pacific Islander
- White

**TOTAL STUDENTS BY RACE**

Enrollment	Number Approved for Free and Reduced-Price Meals/Free Milk	Number Denied

This form should be duplicated and completed each year by each site within the SFA. The completed form will be reviewed during the AR.

*Please complete by October 31 of each year, and retain in your CNP files.*

**PROGRAM DISCRIMINATION COMPLAINT FORM**

First Name: \_\_\_\_\_ Middle Initial: \_\_\_\_\_ Last Name: \_\_\_\_\_

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

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

E-Mail Address (If You Have One): \_\_\_\_\_

Telephone Number, Starting With Area Code: \_\_\_\_\_

Alternate Telephone Number, Starting With Area Code: \_\_\_\_\_

Best Time of Day to Reach You: \_\_\_\_\_

Best Way to Reach You (Check One): Mail \_\_\_\_\_ Phone \_\_\_\_\_ E-Mail \_\_\_\_\_ Other: \_\_\_\_\_

Do you have a representative (lawyer or other advocate) for this complaint? Yes \_\_\_\_\_ No \_\_\_\_\_

If **Yes**, please provide the following information about your representative:

First Name: \_\_\_\_\_ Last Name: \_\_\_\_\_

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

Telephone: \_\_\_\_\_ E-Mail: \_\_\_\_\_

1. Who do you believe discriminated against you? Use additional pages, if necessary. Name(s) of person(s) involved in the alleged discrimination (if known):

Please name the program you applied for (if known/if applicable): \_\_\_\_\_

Please check (✓) the United States Department of Agriculture (USDA) agency below that conducts the program or provides federal financial assistance for the program (if known):

- |  |  |
|--|--|
| <input type="checkbox"/> Farm Service Agency | <input type="checkbox"/> Food and Nutrition Service            |
| <input type="checkbox"/> Rural Development   | <input type="checkbox"/> Natural Resource Conservation Service |
| <input type="checkbox"/> Forest Service      | <input type="checkbox"/> Other: _____                          |

2. What happened to you? Use additional pages, if necessary, and please include any supporting documents that would help show what happened.

3. When did the discrimination occur?

Date: \_\_\_\_\_  
Month Day Year

If the discrimination occurred more than once, please provide the other dates:

4. Where did the discrimination occur?

Address of location where incident occurred:

\_\_\_\_\_  
Number and Street, P O Box, or RD Number

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

5. It is a violation of the law to discriminate against you based on the following: race, color, national origin, religion, sex, disability, age, marital status, sexual orientation, family/parental status, income derived from a public assistance program, and political beliefs. (Not all bases apply to all programs.) Reprisal is prohibited based on prior civil rights activity.

I believe I was discriminated against based on my:

6. Remedies: How would you like to see this complaint resolved?

7. Have you filed a complaint about the incident(s) with another federal, state, or local agency or with a court? Yes \_\_\_\_\_ No \_\_\_\_\_

If **Yes**, with what agency or court did you file? \_\_\_\_\_

When did you file? \_\_\_\_\_  
Month Day Year

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

**Mail Completed Form to:**

USDA  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW, Stop 9410  
Washington, D.C. 20250-9410

**Telephone Numbers:**

Local Area: 202-260-1026  
Toll-Free: 866-632-9992  
Local or Federal Relay: 800-877-8339  
Spanish Relay: 800-845-6136  
Fax: 202-690-7442

E-Mail Address:  
[program.intake@usda.gov](mailto:program.intake@usda.gov)

**United States Department of Agriculture (USDA)**  
**Program Discrimination Complaint Form**  
**Instructions**

**PURPOSE:** The purpose of this form is to assist you in filing a USDA program discrimination complaint. For help filling out the form, you may call any of the telephone numbers listed at the bottom of the complaint form. You are not required to use the complaint form. You may write a letter instead. If you write a letter, it must contain all of the information requested in the form and be signed by you or your authorized representative. Incomplete information will delay the processing of your complaint.

You may also send a complaint by fax or e-mail. We must have a signed copy of your complaint, so if you send your complaint by e-mail, be sure to attach the signed copy to your e-mail. Incomplete information or an unsigned form will delay the processing of your complaint.

**FILING DEADLINE:** A program discrimination complaint must be filed no later than 180 days of the date you knew or should have known of the alleged discrimination, unless the time for filing is extended by USDA. Complaints sent by mail are considered filed on the date the complaint was signed, unless the date on the complaint letter differs by seven days or more from the postmark date, in which case the postmark date will be used as the filing date. Complaints sent by fax or e-mail will be considered filed on the day the complaint is faxed or e-mailed. Complaints filed after the 180-day deadline must include a *good cause* explanation for the delay. For example, you may have *good cause* if:

1. You could not reasonably have been expected to know of the discriminatory act within the 180-day period.
2. You were seriously ill or incapacitated.
3. The same complaint was filed with another federal, state, or local agency and that agency failed to act on your complaint.

**USDA POLICY:** Federal law and policy prohibits discrimination against you based on the following: race, color, national origin, religion, sex, disability, age, marital status, sexual orientation, family/parental status, income derived from a public assistance program, and political beliefs. (Not all bases apply to all programs.)

USDA will determine if it has jurisdiction under the law to process the complaint on the bases identified and in the programs involved. Reprisal that is based on prior civil rights activity is prohibited.

**PROPERTY ADDRESS:** If this complaint involves a farm or other real estate property that is not your current address, write in the address for that farm or real estate property. Otherwise, this part of the form can be left blank.

**PLEASE READ IMPORTANT LEGAL INFORMATION BELOW CONSENT**

This USDA Program Discrimination Complaint Form is provided in accordance with the Privacy Act of 1974, 5 U.S.C. §552a, and concerns the information requested in the form to which this Notice is attached. The USDA's Office of the Assistant Secretary for Civil Rights requests this information pursuant to 7 CFR Part 15.

If the completed form is accepted as a complaint case, the information collected during the investigation will be used to process your program discrimination complaint.

Disclosure is voluntary. However, failure to supply the requested information or to sign the form may result in dismissal of your complaint. If your complaint is dismissed, you will be notified. The information you provide in this complaint may be disclosed to outside parties where USDA determines that disclosure is:

1. Relevant and necessary to the Department of Justice, the court or other tribunal, or the other party before such tribunal for purposes of litigation.
2. Necessary for enforcement proceedings against a program that USDA finds to have violated laws or regulations.
3. In response to a Congressional office if you have requested that the Congressional office inquire about your complaint.
4. To the United States Civil Rights Commission in response to its request for information.

**REPRISAL (RETALIATION) PROHIBITED**

No agency, officer, employee, or agent of the USDA, including persons representing the USDA or its programs, shall intimidate, threaten, harass, coerce, discriminate against, or otherwise retaliate against anyone who has filed a complaint of alleged discrimination or who participates in any manner in any investigation or other proceeding raising claims of discrimination.

**PAPERWORK REDUCTION ACT AND PUBLIC BURDEN STATEMENTS**

The Paperwork Reduction Act of 1995 (44 U.S.C. 3501 et seq.) requires us to inform you that this information is being collected to ensure that your complaint contains all of the information required to file a complaint. The Office of the Assistant Secretary for Civil Rights will use the information to process your complaint of program discrimination.

Response to this request is voluntary. The information you provide on this form will only be shared with persons who have an official need to know and will be protected from public disclosure pursuant to the provisions of the Privacy Act, 5 U.S.C. §552a(b).

The estimated time required to complete this form is 60 minutes. You may send comments regarding the accuracy of this estimate and any suggestions for reducing the time for completion of the form to USDA, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Washington DC 20250-9410.

An agency may not conduct or sponsor, nor is a person required to respond to, a collection of information unless it displays a currently valid OMB Control Number. The OMB Control Number for this form is 0508-0002.

## FINANCIAL MANAGEMENT

### A. Cash Management Improvement Act—Electronic Funds Transfer

The Office of the State Treasurer and the Legislature have established provisions to comply with the Cash Management Improvement Act (CMIA), Public Law 101-453. An electronic system for fund transfer of federal assistance program payments and state match payments to each school food authority (SFA) was implemented, effective July 1, 1993. Therefore, no paper warrants can be issued for Child Nutrition Program (CNP) reimbursement.

### B. Oklahoma Cost Accounting System (OCAS)

1. CNP funds are to be deposited into a separate appropriated fund (Fund 22) or into the General Fund account (Fund 11). Fund 22 is a special revenue fund reserved exclusively for the receipt of CNP funds, including state revenue, federal revenue, and local collections. This fund is under the auspice of the SFA treasurer. CNP funds shall be used only for the benefit of the CNPs. ***NOTE: The Activity Fund (Fund 60) can be used to deposit CNP revenues. These revenues can then be transferred to Fund 22 or Fund 11 at the end of the school year.***
2. The beginning fund balance each year, combined with all actual revenues, including collected and estimated revenues, must be appropriated before being expended. Purchase orders shall be issued against available appropriations; and once goods and services have been received, either payable or nonpayable warrants shall be issued in payment of all purchase orders. Fund 22 shall be reported as a separate appropriated fund in all the financial reports of the SFA, including the Estimate of Needs and Financial Statement.
3. Federal, state, and local funds may be appropriated on temporary appropriations based on 100 percent collections from last year. The budget for September will give the SFA full authority to spend these funds. A supplemental appropriation for cash collections will need to be filed on Form 150. If state and federal reimbursements exceed the estimated amount, a supplemental appropriation may be filed under Form 307.
4. ***The amount that may be appropriated by such temporary appropriations shall in no event exceed the entire amount that the governing board making the application estimates will be available for the entire fiscal year for each purpose for which a temporary appropriation is requested.***
5. Nonpayable warrants may be written, and blanket purchase orders for supplies, etc., may be established.
6. SFAs may elect to have a single bank account for all their funds, tracking them through fund codes; or they may elect to have a separate bank account for CNP funds. The State Department of Education (the *State Agency*) only requires the CNP Fund account to be appropriated and warrants issued through the SFA treasurer, whether using Fund 22 or Fund 11.
7. By resolution of the District School Board, an SFA may opt to establish a bank account in the local area for local collections ***ONLY***. The only checks issued will be to deposit those funds with the SFA treasurer. At the end of the fiscal year, the balance in that account will be closed. ***No other checks may be issued from this account except refunds for students who leave the district.*** This will ease the problem of districts utilizing the services of a county treasurer and daily district travel for deposits (62 O.S. 1991, § 516.5 requires that all funds received are deposited daily). It will also allow sites to clear checks written to their district and process insufficient checks back through the system before the funds are deposited into the appropriated account. This will be done as a school activity subaccount, and the custodian will need to be bonded for this subaccount.
8. This will be presented to the Board, along with other school activity fund subaccounts, listing income as local collections and ***expenses as checks written to the treasurer*** for payment of obligations. Even if SFAs elect this option, state and federal reimbursements will still be electronically transferred to the local or county SFA treasurer.

9. OCAS regulations prohibit the use of appropriated funds to pay for services not yet rendered.
10. School laws of Oklahoma only allow for one encumbrance clerk and one treasurer. A district may elect to have an assistant treasurer who could have the full capability of the SFA treasurer. One person may not be the encumbrance clerk and the treasurer. Those offices must be held by two separate individuals.
11. Auditors require a segregation of duties by two separate individuals whenever money is collected and deposited. Therefore, the CNP needs to have a minimum of two people counting and depositing the monies for CNP.
12. The CNP Fund custodian can become the SFA's CNP Fund specialist acting in the same capacity as the Title I coordinator or any special area administrator. They can complete requisitions, balance their budgets, make local collection deposits if the district elects to establish a local account for local collections only, and fulfill all duties as the coordinator of this project. The only difference will be that the purchase orders must be completed by the encumbrance clerk and the SFA treasurer must register the warrants and pay for them.
13. SFAs may appropriate funds from the General Fund to cover some expenses of the CNPs if special revenue funds are not sufficient to cover the cost of the program.
14. *Even though Oklahoma statutes do not allow sites to loan funds (Article 10 of the Constitution), the United States Department of Agriculture (USDA) does allow transfer of funds as long as a bona fide loan agreement exists at the time the funds are transferred.* A bona fide loan agreement *MAY* be made between a General Fund and the CNP Fund July 1 or prior to the funds being transferred if CNP operations cannot begin without this loan. USDA prohibits SFAs from retroactively designating a transfer of local funds as a loan to the school food service account. A loan agreement must be board-approved for the exact amount that is borrowed and must be repaid on or before June 30 of each year. Prior years' obligations must not be paid with current year funds. Do not borrow more money than can be paid back. If CNP costs exceed revenues, then those costs become a General Fund expense. Refer to **page C-49** for a copy of the Loan Agreement for Food Service Deficits.
15. All warrants on CNP funds must be issued in order of sequence, beginning with No. 1, during each fiscal year.

#### C. Revenues and Expenditures

1. Federal Child Nutrition funds must only be used for the operation and/or improvement of the school food service operations. Expenditures should never exceed revenues reported by each project reporting code.
2. Child Nutrition expenditures:
  - a. Child Nutrition expenses must meet the requirements of 2 CFR §225.
  - b. Expenses must be reasonable, necessary, and allowable.
  - c. Costs must be treated as direct or indirect.
  - d. Allowable costs
    - Salaries and wages/benefits
    - Travel
    - Training and staff development
    - Meetings and conferences
    - Printing and publications
    - Food service or business supplies

e. Allowable costs with prior State Agency approval

- Capital expenditures (equipment purchases, etc.)—Any item with an acquisition cost of \$5,000 or more.
- State Agency must give approval for any capital expenditures. **Note: A list of equipment that has been preapproved can be found on the e-Claims Web site under Other Documents.**

- There have been some questions concerning when a school district must gain approval from the State Agency for the purchase of equipment versus when approval is not necessary. The regulations state any piece of equipment with an acquisition cost of \$5,000 or more must have prior approval before an SFA can use its nonprofit school food service account for its purchase.
- This means that when **ONE** piece of equipment (i.e., oven, mixer) costs \$5,000 or more, prior approval is required. It does not mean that if the total amount of the invoice or purchase order (PO) is \$5,000 or more that the SFA needs approval. Further, it does not mean SFAs must gain approval for kitchen equipment **REPAIRS** that cost \$5,000 or more.
- **EXAMPLE:** An SFA wants to purchase **TWO** ovens, and each oven costs \$4,999.99; so the total invoice is \$9,999.98. In this case, **NO** approval from the State Agency is required (because each oven costs less than \$5,000). However, if each oven costs \$5,000 and the total invoice was \$10,000, the SFA would be required to gain approval from the State Agency prior to the purchase being made.

f. Unallowable costs

- Alcoholic beverages
- Entertainment
- Costs of general government lobbying
- Contribution to contingency funds
- Bad debts

g. SFAs must document expenditures in OCAS accurately.

h. All expenditures must be supported with source documents; i.e., canceled checks, paid bills.

3. Child Nutrition Revenue

a. Revenue for Child Nutrition will consist of reimbursement, State Match, local collections, and funds generated by fundraisers or interest.

b. SFAs must document revenues in OCAS accurately.

4. By September 1 of each year, each school district must report total expenditures/revenues to the OCAS office. The figures reported for Child Nutrition activity will be used by the State Agency to verify compliance that Child Nutrition funds were used and coded in accordance with CN regulations. For RCCIs and boarding schools, a Year-End Expenditure Report is in the RCCI section (**page C-147**).

**EXPENDITURES VERSUS REVENUES FORMULA**

A.	B.	C.	D.	E.
County/District Code	SFA Name	Total CNP Revenue (Program Code: 700; PR Code: 763, 764, 765, 385, 331, 332, 324, 335, 800, 000-199)	Total CNP Expenditures (Program Code: 700; PR Code: 763, 764, 765, 385, 331, 332, 324, 335, 800, 000-199)	Revenues Exceed Expenditures <b>YES/NO</b> (C is = to or greater than D) <b>YES =</b> Compliance)

5. Carryover

- a. Carryover funds from one fiscal year to another—Because CNP funds are now coded by the various federal, state, or local project reporting codes, if there are any carryover funds at the end of the year (June 30), each must be coded to the specific project reporting code originally assigned. **Example: If there are carryover funds in Project Reporting Code 763, then these funds must be coded specifically to Project Reporting Code 763 as cash forward. This coding would be Project Recording Code 763/Source of Revenue Code 6110.**
- b. The total of all CNP funds (federal, state, and local) that are carried over from one fiscal year to the next is what is used to ensure the SFA has not exceeded its three-month operating balance.
- c. **NOTE: The operating balance as of June 30 for any fiscal year must be carried over into the next fiscal year (Revenue Code 6110) and is counted toward the operating balance of the following fiscal year. The carryover funds must be coded to the specific Project Reporting Code (i.e., 763, 764, 765, 385)**

D. Nonprofit School Food Service Account

1. SFAs shall maintain a nonprofit school food service. (7 CFR §210.14[a])
2. Unlike other federal programs, CNP can have a carryover as of June 30 of each year. This carryover could be used for food for the new school year. Three-month operating balance: USDA regulation §210.14(b) requires an SFA to limit its net cash resources to an amount that does not exceed three months average expenditures for its nonprofit school food service. The State Agency uses the Oklahoma Cost Accounting System (OCAS) records to determine if an SFA has exceeded its three-month operating balance requirement. Total Child Nutrition (Program Code 700/Project Reporting Codes 763, 764, 765, 799, 385, 331, 332, 334, 335, 800, and 000-199) expenses are divided by 9 (months) and multiplied by 3 (months) to obtain an average 3-month operating balance. If the SFA's operating balance as of June 30 exceeds the 3-month operating balance, the SFA is out of compliance. The formula is below:

**FORMULA FOR CALCULATING AVERAGE THREE-MONTH OPERATING BALANCE**

A.	B.	C.	D.	E.	F.	G.	H.
County/ District Code	SFA Name	Total CNP Revenue (Program Code: 700; PR Code: 763, 764, 765, 385, 331, 332, 324, 335, 800, 000-199)	Total CNP Expenditures (Program Code: 700; PR Code: 763, 764, 765, 385, 331, 332, 324, 335, 800, 000-199)	Total Expenditures Divided by 9 Multiplied by 3 = Average 3-Month Operating Balance	Child Nutrition Revenue Minus Child Nutrition Expenditures = Operating Balance as of June 30 (C - D = Operating Balance)	District Exceeds 3-Month Operating Balance— <b>YES/NO</b> (F is greater than E)	Amount Exceeded, if Any

E. Revenue From Nonprogram Food Expenditures/Revenues Requirement—Healthy, Hunger-Free Act of 2010, Section 206 (Reference USDA Policy Memo SP-39-2011)

1. The purpose of the revenue from the nonprogram foods provision is to ensure that revenues from the sales of nonprogram foods generate at least the same proportion of SFA revenues as they contribute to SFA food costs.
2. For the purposes of this provision, a nonprogram food is a food (including beverages) that is sold in a participating school other than a reimbursable meal and is purchased using funds from the school food service account of the school.

These include, but are not limited to:

- a. À la carte items sold in competition with school meals.
  - b. Adult meals.
  - c. Contract meals.
  - d. Items purchased for fundraisers, vending machines, school stores, etc.
  - e. Items purchased for catering and vended meals.
3. Revenue is all money that is provided to the nonprofit school food service account. This includes, but is not limited to:
    - a. Federal reimbursement.
    - b. State or local funds such as per meal subsidies and state revenue matching funds.
    - c. Children’s payments for reimbursable meals and à la carte sales.
    - d. Payments for items purchased for fundraisers, vending machines, etc.
    - e. Income from contract, catering, adult meals, vended meals, etc.
  4. The cost to obtain a nonprogram food includes only the cost of the food. If a nonprogram food is made from scratch, the SFA would determine the price of ingredients to calculate the food cost. The SFA should not include labor or other costs in this calculation.

This same principle applies to calculating program food costs for the purpose of this provision.

5. The SFA **MUST** determine its total food cost and the proportion of that total that is nonprogram food. The SFA would then calculate the share of total revenue generated from nonprogram food sales over the same period. If the second figure is at least as great as the first figure, then the SFA is generating sufficient revenue from nonprogram food costs. The State Agency tracks the nonprogram food costs and revenues through OCAS using the following formula:

## NONPROGRAM FOOD REPORT FORMULA

A.	B.	C.	D.	E.	F.	G.	H.	I.
County/ District Code	SFA Name	All Food Expenditures (Program Code: 700; PR Code: 000-199, 385, 763, 764, 765, and 800; Function Code: 3110, 3150, and 3155; Object Code 630)	Nonprogram Food Expenditures (Program Code: 700; PR Code: 385, 763, 764, and 765; Function Code: 3110 and 3155; Object Code 630)	% of Nonprogram Food to All Food Expenditures	All Food Revenue (Program Code: 700; PR Code: 000-199, 385, 763, 764, 765, and 800; Revenue Source Code: 1710, 1720, 1730, 1760, 1790, 3720, 4710, 4720, and 4730)	Nonprogram Food Revenue (Program Code: 700; PR Code: 000-199, 385, 763, 764, 765, and 800; Revenue Source Code: 1720, 1730, and 1760)	% of Nonprogram Food Revenue to All Revenues	Meets USDA Requirement—E Is Equal to or Less Than H <b>YES/NO</b> <b>YES =</b> Compliance

6. An SFA can price some nonprogram foods lower than their actual cost as long as the total revenue generated from all nonprogram food sales meets the proportional requirement described above.
7. The SFA uses the revenue and costs for a school year to calculate revenue targets. For the current school year, the revenue and costs for the previous school year are used.
8. All SFAs must do the revenue calculations through eClaims. If the proportion of revenue is equal to or greater than the proportion of the food costs, no additional action is needed. If not, the SFA must review the prices charged for nonprogram foods and make necessary adjustments.
9. If a district is not charging enough for the adult meals or à la carte and the district does not want to raise prices, then the district **MUST** charge some of its **FOOD** purchases to the General Fund (Project Reporting Code 000, Function Codes 3110 and 3155).
10. If a district is paying for all of Child Nutrition **UTILITIES** from the General Fund in an effort to show it is paying for **ADULT** meals, this will **NOT** work with OCAS coding. The district needs to pay for the **ADULT/À LA CARTE FOOD** from the General Fund (Project Reporting Code 000/Function Code 3155/Object Code 630). The Child Nutrition Fund could then be coded to pay the **UTILITIES** up to that amount. This way, the General Fund is not paying **ANY MORE** than it was to begin with, but the Nonprogram Food Report would be in compliance. (Reference **page C-57** for the Chart on Adult Meal Costs.)
11. Child Nutrition OCAS Code Expenditure Worksheet—To assist districts in knowing how to break down invoices of food/beverage purchases, this worksheet can be used. See **page C-55** for a copy of this worksheet.

### F. Direct Costs/Indirect Costs

1. **Direct costs**—Incurred **SPECIFICALLY** for a program or other cost objective; clearly identifiable.

Examples:

- Wages and salaries of food service workers
- Cost of food purchased
- Food service supplies

- Food service equipment purchases
  - Prorated Direct Costs that would usually be charged as Indirect Costs; i.e., prorated utility costs
2. **Indirect costs**—Incurred for the benefit of multiple programs, functions, or other cost objectives; not readily identifiable.

Examples:

- Payroll services
  - Human resources
  
  - Workers' compensation
  - Electricity
  - Gas
  - Trash
3. Cost assignments to direct costs or indirect costs are unique to each SFA.
4. SFAs who are charging indirect costs to Child Nutrition must:
- a. Have an approved indirect cost statement with the State Agency showing the approved indirect cost rate.
  - b. Allowable indirect costs (as well as direct costs) must be identified in a consistent manner.
  - c. An SFA must identify indirect costs by using the same methodology to allocate certain shared costs across the entire spectrum of its federal programs.
  - d. The SFA must not charge indirect costs previously paid by the General Fund.
  - e. Any direct costs prorated for Child Nutrition (i.e., utilities) that would normally be considered an indirect cost must be subtracted from the indirect cost rate charged to Child Nutrition if the district is applying indirect cost to Child Nutrition.

#### G. OCAS Codes

Child Nutrition (CN) financial transactions shall be coded in fund dimension as a Special Revenue Fund Code **22** or General Fund Code **11**. All CN expenditures and revenues must be coded to Program Code 700. Each Child Nutrition Program has its own Project Reporting Code in the 700 series. The 700 series under the Project Reporting Codes represents **FEDERAL FUNDS** (which is what Child Nutrition Programs are). Because the Teachers' Retirement System requires a **MATCH** to be paid on any salaries paid from federal funds, **a district using federal funds (Project Reporting Codes 763, 764, 765, 766, 768, and 769) to pay its employees must also pay a match to the Teachers' Retirement System as per Oklahoma Statute (O.S.) 715:10-13-7**. This rule only applies to those employees who qualify for Teachers' Retirement. The required match is a legitimate expense under Child Nutrition.

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**CHILD NUTRITION**  
**OKLAHOMA COST ACCOUNTING CODES (OCAS)**  
**Fund 22, Fund 11, or Fund 60—Program Code 700**

REVENUE	EXPENDITURE
FEDERAL	FEDERAL
<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>763 Lunches (includes ASSP and SSO)</li> <li>764 Breakfasts</li> <li>765 Special Milk</li> <li>766 Summer Food Service Program</li> <li>768 Fresh Fruit/Veg</li> <li>769 Child and Adult Care Food Program</li> <li>791 Equipment Grant</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Revenue Code:</b></p> <ul style="list-style-type: none"> <li>4710 Lunches, Snacks</li> <li>4720 Breakfasts</li> <li>4730 Special Milk</li> <li>4740 Summer Food Service Program</li> <li>4750 Child and Adult Care Food Program</li> <li>4760 Fresh Fruit/Veg</li> <li>4780 Equipment Grant</li> <li>6110 Carryover From Previous Fiscal Year</li> </ul> <p><i>NOTE: There is no federal revenue for à la carte sales.</i></p>	<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>763 Lunches (includes ASSP and SSO)</li> <li>764 Breakfasts</li> <li>765 Special Milk</li> <li>766 Summer Food Service Program</li> <li>768 Fresh Fruit/Veg</li> <li>769 Child and Adult Care Food Program</li> <li>791 Equipment Grant</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Function Code:</b></p> <ul style="list-style-type: none"> <li>2318 Audit Services</li> <li>3110 Food and Milk Purchases for À la Carte/Catering</li> <li>3120 Direct Labor/Benefits and FSMC</li> <li>3130 Food and Supplies/Delivery Services</li> <li>3140 Other Direct and/or Related Child Nutrition Program Services; Equipment Grant</li> <li>3150 Food and Milk Purchases for Students (Reimbursable Meals)</li> <li>3155 Food and Milk Purchases for Adult/Contract Meals Only</li> <li>3160 Nonreimbursable Services</li> <li>3180 Nutrition Education and Staff Development</li> <li>3190 Other Child Nutrition Programs Operations</li> <li>5200 Fund Transfers</li> <li>5400 Indirect Costs for Child Nutrition</li> <li>5600 Other Refunds (Lost Lunch Tickets)</li> </ul>
STATE	STATE
<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>332 Flex Benefits (Support Staff With Health)</li> <li>335 Flex Benefits (Support Staff Without Health)</li> <li>385 State Match Revenue</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Revenue Code:</b></p> <ul style="list-style-type: none"> <li>3710 State Reimbursement <i>NOTE: Not available at this time.</i></li> <li>3720 State Matching</li> <li>6110 Carryover From Previous Fiscal Year</li> </ul>	<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>332 Flex Benefits (Support Staff With Health)</li> <li>335 Flex Benefits (Support Staff Without Health)</li> <li>385 State Match Expenditures</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Function Code:</b></p> <ul style="list-style-type: none"> <li>2318 Audit Services</li> <li>3110 Food and Milk Purchases for À la Carte/Catering</li> <li>3120 Direct Labor/Benefits and FSMC</li> <li>3130 Food and Supplies/Delivery Services</li> <li>3140 Other Direct and/or Related Child Nutrition Program Services</li> <li>3150 Food and Milk Purchases for Students (Reimbursable Meals)</li> <li>3155 Food and Milk Purchases for Adult/Contract Meals Only</li> <li>3160 Nonreimbursable Services</li> <li>3180 Nutrition Education and Staff Development</li> <li>3190 Other Child Nutrition Programs Operations</li> <li>8100 Restricted Repayment Funds</li> </ul>
LOCAL	LOCAL
<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>000-199</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Revenue Code:</b></p> <ul style="list-style-type: none"> <li>1710 Student Lunches, Breakfasts, Snacks, Special Milk (Reimbursable Meals)</li> <li>1720 À la Carte or Catering Revenue</li> <li>1730 Adult Lunches, Breakfasts, Snacks</li> <li>1740 Summer Food Service Adult Revenue</li> <li>1760 Contract Lunches, Breakfasts, Milk, and Snacks</li> <li>1790 Other District Revenue (CN)</li> <li>1794 Commodity Rebates</li> <li>1795 Promotional Rebates</li> <li>5120 Cash or Change</li> <li>5150 Reimbursement From Another Fund</li> <li>5300 Insufficient Funds</li> <li>5600 Correcting Entry</li> <li>6110 Carryover From Previous Fiscal Year</li> </ul>	<p><b>Project Reporting Code:</b></p> <ul style="list-style-type: none"> <li>000-199</li> </ul> <p><b>Program Code:</b></p> <ul style="list-style-type: none"> <li>700 Child Nutrition Program</li> </ul> <p><b>Function Code:</b></p> <ul style="list-style-type: none"> <li>2318 Audit Services</li> <li>3110 Food and Milk Purchases for À la Carte/Catering</li> <li>3120 Direct Labor/Benefits and FSMC</li> <li>3130 Food and Supplies/Delivery Services</li> <li>3140 Other Direct and/or Related Child Nutrition Program Services</li> <li>3150 Food and Milk Purchases for Students (Reimbursable Meals)</li> <li>3155 Food and Milk Purchases for Adult/Contract Meals Only</li> <li>3160 Nonreimbursable Services</li> <li>3180 Nutrition Education and Staff Development</li> <li>3190 Other Child Nutrition Programs Operations</li> <li>5600 Other Refunds (Lost Lunch Tickets)</li> </ul>

**NSLP/SBP/SMP ADDITIONAL OCAS CODES**

EXPENDITURE	FUNCTION	OBJECT
<b>Building Renovations</b>	3190	450
Custodial Supplies (Warehouse)	3140	618
Department of Human Services (USDA Foods Assessment Fee)	3140	599
Health Department Fee for License	3140	810
Nonexpendable Equipment (\$5,000 or more) – Purchase	3140	730
<b>Equipment Grant</b>	3140	731 or 651
Equipment – Repair	3140	430
Expendable Equipment (less than \$5,000) – Purchase	3140	651
Extermination	3140	424
Forms – Publication Orders	3190	550
Insufficient Check Charge	3160	810
Inservice (Miscellaneous Items Purchased for Workshop for Cooks/Managers)	3180	619
Investment Accounts	5700	990
Inservice Speaker (Paying a Fee)	3180	360
Miscellaneous Office Supplies	3190	619
Miscellaneous Materials/Supplies	3140	619
Paper Products	3140	617
<b>Credit Card Machine</b>	3140	810
<b>Food Service Management Company (FSMC) Fee</b>	3140	570
Refund on Unused Lunch Tickets	8900	930
Refund to State Agency	8100	930
Postage	3140	530
Registration for Meetings/Workshops	3180	860
Reimbursement for Travel – In-District	3140	580
Reimbursement for Travel – Out-of-District	3140	580
Supplies (Nonedibles) (Vendor or Warehouse)	3140	651
Uncollected Meal Charges	3160	890
<b>Uniforms</b>	3140	657
Indirect Cost	5400	970

**SFSP/EQUIPMENT/FFVP/CACFP/BANQUETS/CATERING/ADULT KITCHENS  
OCAS CODES**

EXPENDITURES	REVENUE
<p><b>Fund:</b> 22 or 11</p> <p><b>Project Reporting:</b>                      Summer Food Service Program—766                      Fresh Fruit and Vegetable—768  <b>Equipment Grant—791</b>                      Child and Adult Care Food Program—769                      Banquets/Catering/Adult Kitchens—000-199                      (SFA assigns this number)</p> <p><b>Function:</b>                      Suggested Codes:                      SFSP/CACFP—3190                      FFVP—3120-3190                      Equipment Grant—3140                      Banquets/Catering/Adult Kitchens—3160                      Refund of Equipment Grant to State Agency—8100                      (Object Code—900)</p> <p><b>Object:</b> Anything that meets the need</p> <p><b>Program:</b> 700</p> <p><b>Subject:</b> 0000 (does not apply to CNP)</p>	<p><b>Fund:</b> 22 or 11</p> <p><b>Project Reporting:</b>                      Summer Food Service Program—766                      Fresh Fruit and Vegetable—768  <b>Equipment Grant—791</b>                      Child and Adult Care Food Program—769                      Banquets/Catering/Adult Kitchens—000-199                      (SFA assigns this number)</p> <p><b>Source of Revenue:</b>                      SFSP Federal Reimbursement—4740                      FFVP Federal Reimbursement—4760                      Equipment Grant—4780                      CACFP Federal Reimbursement—4750                      Banquets/Catering/Adult Kitchens—1790</p> <p><b>Program:</b> 700</p> <p><b>Operational Unit:</b> 0000 (does not apply to CNP)</p>

## G. Audits

### 1. Type A Audits (\$500,000 or more in federal award funds expended)

Oklahoma statutes allow SFAs a timeline of 11 months after the close of the school year for the completion and submission of an annual audit (70 O.S. 2001 §22-108). However, OMB Circular A-133 § 3052.320 states:

“The audit shall be completed and submitted within the earlier of 30 days after receipt of the auditor’s report(s) or *nine months after the end of the audit period* unless a longer period is agreed to in advance by the cognizant or oversight agency for audit.”

Therefore, any Type A audits (\$500,000 or more in federal award funds expended, including the value of USDA foods, reference USDA Policy Memo No.: FD-104 Feb. 18, 2010) are due in the Auditing Section’s office no later than March 31 of each year. ***Federal funds will be withheld on any Type A audits not received by March 31 of each year*** and will only be released upon notification of receipt of the audit(s) by the agency’s Auditing Section.

### 2. Type B Audits (less than \$500,000 in federal award funds)

For SFAs receiving less than \$500,000 in total federal funds, an audit conducted in accordance with Sections 452 through 461 of the School Laws of Oklahoma shall be submitted to the State Agency Auditing Section no later than May 31. Failure to submit such required audit shall result in the withholding of CNP reimbursement until the audit is received.

## H. Claim for Reimbursement

CNPs are performance-based reimbursement programs (entitlement programs). The SFA reports all meals (breakfasts, lunches, and/or snacks) served on a monthly reimbursement claim. The claim for reimbursement reports the number of meals served by category (free, reduced-price, or full-price) multiplied by the applicable reimbursement rates. SFAs participating in the Special Milk Program (SMP) will provide the number of half-pints of milk served to split-session preprimary or kindergarten students multiplied by the applicable reimbursement rates. If an SFA participates in the Seamless Summer Program, a separate claim must be submitted.

Prior to the first month’s claim submission for the school year, the SFA must have a completed and approved renewal application, agreement, and policy statement. Each claim must include only meals/milk served within that particular calendar month, except if the first or last month of the school year contains ten or less operating days. If the first or last month of the school year contains ten or less operating days, then such month may be combined with the claim for the appropriate adjacent month. However, claims may not combine operations occurring in two different fiscal years.

SFAs must maintain free and reduced-price eligibles of currently enrolled students, as well as categorical meal counts by school site, even though the claim reflects district totals.

Claims are to be submitted by the tenth of the month following the month covered by the claim. Although the State Agency may accept claims for reimbursement or claim revisions as late as 60 days following the end of the month that the claim covers, claims postmarked later than 60 days cannot be paid. A copy of the claim for reimbursement is on **page C-51**.

## I. CNP eClaims System

### 1. Introduction

The CNP eClaims system provides a quick and efficient method to process claim information and required forms.

Data is entered directly into the computer where it will immediately be edited, calculated, and prepared for transmission. Each report or claim will be electronically transmitted to the State Agency for processing. Status notification from the State Agency will be available shortly after transmission.

### 2. Username and Password

The superintendent or *log on administrator* may assign a username and password to any CN personnel. Depending on the type of role an individual has within CNP, the username and password assigned will allow the user to perform different functions. For example, several people could be assigned the role of *district user*, allowing each individual to view, enter, and save CN information for the district. However, ***at least one person per district must be assigned the role of authorized representative***. The authorized representative is the person with the authority to ***SUBMIT*** the information once it has been entered. This must be the same individual who signs the Certificate of Authority. The authorized representative has access to all eClaims functions in addition to the submission function. Using his or her username and password as a signature, the authorized representative is verifying that all submitted information is true and correct. To add a person as the SFA's authorized representative, refer to the instructions below:

- a. Log onto the State Agency Web site at [www.sde.ok.gov](http://www.sde.ok.gov). Click on the box that reads *School District Reporting Site*.
- b. The *Log On* screen will appear. Type in the superintendent's Username and Password that has been assigned by the OCAS Section of the State Agency. This password could be expired. If so, read the instructions as to how to enter a new password. Once a new password is established, enter your Username again with your ***NEW*** password.
- c. A *Welcome* page will appear. To the left of the *Welcome* message, you will see a list of several options. Click on the third option: *User Identification and Access*.
- d. The *User Identification and Access* screen will appear. Scroll to the bottom of this page to find the words *Add a new user*.
- e. Type in a Username and Password for the person you are designating to be the authorized representative for CNP. It is recommended that you use the person's first and last names for both the Username and Password. Be sure to use the pull-down menu to the right of the word *Role* to indicate what access level this person is being assigned. The *Role* bar should show *Authorized Representative*. Click the *Add* button. The name of the person added should now show up under the list of users for the district. This list of users is at the top of the current page.

- f. Click on this person's name. A screen will appear for that individual. Complete the *User Information* section for that person on the left side of the screen.
  - g. To the right of this screen, you will see an *Applications* section. Find the pull-down menu under *Applications*, and scroll down to *Child Nutrition*. Next, use the *Access Level* pull-down menu to indicate the access level of the individual is that of *Authorized Representative*. The access level assigned here should be the same access level assigned on the previous screen when the person was first added to the system. Click the *Add* button, and then click the *Save* button. This person is now set up in the district's system as the authorized representative of Child Nutrition.
  - h. The SFA must now submit a hard copy of the Certificate of Authority to the CNP office for approval. Once approval is granted, the new authorized representative will be able to access CNP eClaims.
3. How to Access CNP eClaims—
- a. Log onto the State Department of Education Web site at [www.sde.ok.gov](http://www.sde.ok.gov).
  - b. This will bring you to the SDE Web site. Click on *Site Index* on the upper right side of the page. Scroll down to Child Nutrition eClaims Programs, and click on it.
  - c. Type your Username and Password in the boxes indicated. Click the **Log On** button; click on the eClaims system link, then the main menu for your SFA will appear.
  - d. Now you may explore all that the CNP eClaims System has to offer:
    - Application Information and Application Processing
    - Claims Information and Claims Processing
    - Processing of All Reports Due During the School Year:
      - Low-Income Student Count Report
      - Consolidated Verification Summary
      - Year-End Revenue/Expenditure Report
    - Access to School Food Service Compliance Document and many record-keeping forms

J. Low-Income Student Count Report (RCCIs Not Required to Complete)

1. In a continuing effort to reduce paperwork, a single form has been developed for reporting free and reduced-price meal eligibility information that has previously been reported on several different forms. The data reported will be used to fulfill the following regulatory requirements:
  - a. Title I Allocations—Districts must report by site the number of enrolled students aged 5 through 17 eligible for free or reduced-price meals.
  - b. Public Law 101-647 and Public Law 101-325—Replaces Low-Income Student Count Survey formerly sent to districts each January (Federal Perkins and National Direct Student Loan Cancellation Benefits).
  - c. Public Law 104-193—Provides that SFAs must disclose the names of the elementary sites where 50 percent or more of enrolled students are eligible for free or reduced-price meals.
  - d. Public Law 105-336—Provides that SFAs may claim snacks free for those sites operating an after-school educational or enrichment program in which 50 percent or more of enrolled students are eligible for free or reduced-price meals.
  - e. E-rate Information—Provides for Internet discounts from the U.S. Department of Libraries.
2. The eClaims System must process the October claim for reimbursement before it will allow the SFA to submit the Low-Income Student Count Report. This is so the computer can edit the number of free and reduced-price eligible students reported to ensure that the numbers on both forms match. A hard copy of the form **MUST** be printed, dated, signed, and submitted to the State Agency by **November 21, 2014**. (Refer to information concerning carryover applications in the Eligibility Section.) The report represents the highest number of free and the highest number of reduced-price eligible currently enrolled students for the entire month of October (the last number of Column 6 [for free] and the last number of Column 10 [for reduced-price] from each site's Edit Check Worksheet added together). So—even if the district has its October enrollment figures from Accreditation, it **may not** have its **HIGHEST** free and reduced-price eligible figures until the end of October. Every accredited site **MUST** be included. If an SFA has an unaccredited site (i.e., Head Start, alternative site, four-year-old site), those currently enrolled students should be counted at the accredited site where they would attend in the future or the accredited site they should currently be attending. Adult education students, out-of-home placement students, off-site virtual students, or students three years of age (preprimary) and under (unless they are enrolled) are **NOT** included in the number of free and/or reduced-price eligibles reported on the monthly claim for reimbursement or the Low-Income Student Count Report.
3. The **TOTAL** free and **TOTAL** reduced-price eligible counts (of current enrolled students) **for your entire SFA** must match the total counts for the free and reduced-price eligibles as reported on the **OCTOBER** CNP claim for reimbursement for your district. All numbers submitted on this report are subject to audit. Revisions to these numbers will only be accepted until **November 26, 2014**. Also be aware that if the Low-Income Student Count Report is revised, the October claim for reimbursement **MUST** also be revised and vice versa. Once the SFA has done a **Final Submit** on its Low-Income Student Count Report, any revisions must be completed by the State Agency. An example of the Low-Income Student Count Report is on **page C-53**.

4. Special Instructions for Provision 2 and Provision 3 Sites

Sites that are on Provision 2 or Provision 3 are handled differently than other sites for the Low-Income Student Count Report. After October 1 the SFA **MUST** go into the eClaims system and enter the enrollment per the accreditation report for each site participating in Provision 2/3. Once the enrollment is entered, the new free/reduced-price and paid eligibility figures for the current school year appear for that site. Once the site receives the new free/reduced-price and paid eligibility figures, the site will then take these numbers and determine the number of 4-and-under students and the number of 18-and-over students by using current year percentages and applying them to current year eligibility figures.

**EXAMPLE FOR PROVISION 2 AND PROVISION 3 SITES**

Elementary Site:	Current Enrollment—80	High School Site:	Current Enrollment—110
	Free Eligibles—60		Free Eligibles—64
	Reduced-Price Eligibles—10		Reduced-Price Eligibles—12

1. The district will need to figure out its 4-and-under count at the elementary site.

Figure the current percentage of free eligible students from the current elementary enrollment (60 divided by 80 = 75%)

Figure the current percentage of reduced-price eligible students from the current elementary enrollment (10 divided by 80 = 13%)

Apply the 75% to the number of 4 and under the site currently has to get the free eligible count for the 4- and-unders.

Apply the 13% to the number of 4 and under the site currently has to get the reduced-price eligible count for the 4- and-unders.

2. Use this same formula for the high school site to figure the 18 and over free and reduced-price eligibility numbers.
3. Once the free and reduced-price eligible numbers are obtained for the 4-year-olds at the elementary and the 18-year-olds and over at the high school, the remaining students who are free or reduced-price would be reported in the 5-17-year-old category.
4. To get the 5- to 17-year-old ENROLLMENT, the district should take the current site enrollment for the elementary and subtract out the students who are currently 4 and under at the elementary site. If a student turned 5 in the month of October, count that student in the 5-17-year-old group. Likewise, the district should take the current site enrollment for the high school and subtract out students who are 18 and over at the high school site. If a student turned 18 in the month of October, count that student in the 5-17-year-old group.

## K. Student Meal Prices

1. The prices charged by SFAs often require school board approval. Unfortunately, many people do not understand the financial responsibility of SFAs and do not realize that the costs involved are much like those paid by commercial restaurants. Factors to be considered when establishing prices include:
  - a. Actual cost of producing and serving the food.
  - b. Present prices charged and rates of reimbursement.
  - c. Economic situation at the time.
  - d. Reasons for needing to increase prices.
  - e. What competitors are charging—commercial and other nearby SFAs.
  - f. When the price was last increased.
  - g. Whether the price increase can be justified publicly (in media).
  - h. Whether reducing costs has been considered.
  - i. Reduction in participation or sales that usually follows price increases.
  - j. What the customer considers fair value.
2. Commercial cafeterias and restaurants often base price on food costs and a markup factor. This is not recommended for SFAs because labor costs may be greater than food costs. Instead, the total real costs should be used.
3. Paid Lunch Equity Requirement—Healthy, Hunger-Free Kids Act of 2010, Section 205
  - a. Schools are required to charge students for paid meals at a price that is, on average, equal to the difference between free meal reimbursement and paid meal reimbursement rates. This provision is for lunch only.  
**NOTE: Nonpricing schools are exempt from the requirement.**
  - b. Schools that currently charge less are required to gradually increase their prices over time until they meet the requirements (from 5¢ to 10¢ per year). Schools may choose to cover the difference in revenue with nonfederal funds instead of raising paid meal prices. SFAs may vary paid lunch prices by school as long as the average revenue requirement is met across the SFA.
  - c. Toward the end of the school year, the SFA will be required to complete the Paid Lunch Equity Tool. Once completed, this tool will show the SFA how much its student paid lunch meal price must be increased for the following school year or the amount of funds necessary to subsidize its CNP.
  - d. Schools are required to submit their student paid lunch prices (what they charge their paying students) to the State Agency with their Renewal Application.
  - e. New SFAs must charge paying students the required maximum amount (the difference between the free reimbursement rate and the paid reimbursement rate). Reference USDA Memo SP-39-2011 (Revised).
  - f. Financial support from nonfederal sources must be cash for direct support for paid lunches, including, but not limited to:
    - Any portion of state revenue matching funds that exceeds the minimum requirement established in 7 CFR §210.17 and that is provided for paid lunches. (Multiply total number of **PAID** lunches claimed in the previous school year by 2 cents.)
    - Per-meal nonfederal reimbursement for **ANYPAID** meal (breakfast, lunch, etc.).
    - Any funds provided by organizations for **ANYPAID** meal.
    - Any proportion attributable to **PAID MEALS** from direct payments made from school district funds to support lunch service.

Some examples of **UNALLOWABLE** nonfederal support are (see the formula on the next page):

- Any payments, including additional per-meal reimbursements, provided to the SFA for support of the SBP or other CNP.
- Any payments, including additional per-meal reimbursements, provided specifically to support free and reduced-price meals.

**FORMULA FOR USING NONFEDERAL FUND SOURCES  
FOR PAID LUNCHES  
(Reference USDA Memos SP-39-2011 and SP-34-2013)**

**STEP ONE:**

$$\frac{\text{A}}{\text{B}} = \text{C}$$

**A** Divided by **B** Equals **C**  
**Total STUDENT Lunches Claimed in Previous Year**      **Total STUDENT Breakfasts and Lunches Claimed in Previous Year**      **% of STUDENT Lunch Meals**

**STEP TWO:**

Total Dollar Amount of Expenditures From Fund 11 and Fund 60/Program Code 700/Project Reporting Code 000/Function Codes 3120, 3130, 3140, and 3150 = \$ \_\_\_\_\_

**D**  
**Nonfederal Fund Sources**

**STEP THREE:**

$$\text{D} \times \text{C} = \text{E}$$

**D** Multiplied by **C** Equals **E**  
**Nonfederal Fund Sources (Step Two)**      **% of STUDENT Lunch Meals (Step One)**      **SFA Subsidy for Total STUDENT Lunches**

**STEP FOUR:**

$$\frac{\text{F}}{\text{A}} = \text{G}$$

**F** Divided by **A** Equals **G**  
**Paid STUDENT Lunches Claimed in Previous Year**      **Total STUDENT Lunches Claimed in Previous Year (Step One)**      **% of Paid STUDENT Lunches**

**STEP FIVE:**

$$\text{E} \times \text{G} = \text{H}$$

**E** Multiplied by **G** Equals **H**  
**SFA Subsidy for Total STUDENT Lunches (Step Three)**      **% of Paid STUDENT Lunches (Step Four)**      **SFA Subsidy for Paid STUDENT Lunches**

**STEP SIX:**

$$\text{F} \times .02 = \text{I}$$

**F** X .02 = **I**  
**Paid STUDENT Lunch Meals Claimed in Previous Year (Step Four)**      **State Match Contribution for Paid STUDENT Lunches**

**STEP SEVEN:**

$$\text{H} + \text{I} = \text{J}$$

**H** + **I** = **J**  
**SFA Subsidy for Paid STUDENT Lunches (Step Five)**      **State Match Contribution for Paid STUDENT Lunches (Step Six)**      **TOTAL AMOUNT OF NONFEDERAL SOURCE FUNDS FOR PAID STUDENT LUNCHES**

L. Adult Meal Prices (Reference FNS Instruction 782-5 [6/6/98])

1. Revenue from the NSLP and SBP **CANNOT** be used to subsidize adult meals. If school employees are not charged the minimum amount required, the money for the meals must come out of the General Fund. SFAs report their adult meal prices during the renewal application process. Refer to page **C-54** to determine how much of the General Fund must be used to subsidize adult meals if the SFA is not charging what is required.

State Agency and federal regulations state that the adult must be charged:

- Adult lunch charge equals free reimbursement rate for lunch plus the additional incentive payment plus the value of USDA Foods.
  - Adult breakfast charge equals free reimbursement rate for regular breakfast.
  - Adult snack charge equals free reimbursement rate for snack.
  - The size of the adult meal should be no larger than the largest portions allotted to the students.
2. Adult meals other than CNP employee meals cannot be served free of charge unless the local LEA absorbs the cost. CNP employees are adults who are directly involved in the operation and administration of the school nutrition programs. If the LEA is absorbing the cost, food for these adult meals should be coded to Project Reporting Code 000/Function Code 3155.
  3. Meals served to any adults may **NOT** be claimed for reimbursement or counted toward the donated foods (USDA Foods) entitlement. The determination of individuals, positions involved, and the degree to which their services are attributed to the nonprofit food service program operations is left to local officials.
  4. The Nonprogram Food Expenditures/Revenues Report will indicate if an SFA is charging enough to cover its cost for adult meals.

M. Contract Meal Prices

1. An SFA that contracts meals to other institutions must charge, **at a minimum**:
  - Contract lunch charge equals free reimbursement rate for lunch plus the additional incentive payment plus the value of USDA Foods.
  - Contract breakfast charge equals free reimbursement rate for regular breakfast.
  - Contract snack charge equals free reimbursement rate for snack.
  - The size of the adult meal should be no larger than the largest portions allotted to the students.
2. A copy of the written contract agreement on **page C-105** must be kept on file for review.
3. If an SFA is contracting with an institution for which USDA Foods are allocated, the SFA should **NOT** include the commodity allocation rate in the formula when figuring the minimum amount to charge for contract lunches.
4. The Nonprogram Food Expenditures/Revenues Report will indicate if an SFA is charging enough to cover its cost for contract meals.

N. State Matching Reimbursement

Each school year USDA requires the state of Oklahoma to appropriate revenues to be used for NSLP purposes at the local level. Since some SFAs are operating on a **YEAR-ROUND** basis, state matching reimbursement is calculated on the total lunches served in the previous school year. The state matching reimbursement is paid in two payments per year, processed in January and May.

O. Reduced-Price Meal Charge

The Omnibus Reconciliation Act of 1981 mandated that the maximum amount which can be charged for a reduced-price lunch is 40 cents. The maximum reduced-price charge for breakfast is 30 cents. Public Law 105-336 of the Child Nutrition Reauthorization Act of 1998 mandated that the maximum amount which can be charged for a reduced-price snack is 15 cents. While these are the maximum amounts that may be charged, districts may elect to charge less for either lunch, breakfast, or snacks. Districts may also choose to provide meals at no cost to their reduced-price eligible students. The expenditures associated with covering the reduced-price student payments may be funded from the nonprofit school food service account. (Reference: USDA Memo SP-17-2014) Reduced-price meals must always be claimed at the reduced-price rate of reimbursement, whether the district charges the maximum amount, lesser amount, or not at all. **Note: Nonpricing schools are not required to send out the Notice of Approval/Denial of Benefits.**

P. Nonpricing Programs

Any site participating in the NSLP/SBP/ASSP that does not charge its students for any meals and/or snacks is considered a **nonpricing program**. Any site has the option of not charging its students for meals/snacks served and claimed for reimbursement; however, most sites that do this have very high percentages of free and reduced-price eligible students. Sites may want to use the Income Sources for Meals form on **page C-58** to determine if a nonpricing program is feasible. **NOTE: Nonpricing sites must make sure that all students are claimed in the correct eligibility category (free, reduced-price, or paid), even though all meals are served free. SFAs implementing nonpricing at all their sites are not required to do the Paid Lunch Equity Tool.**

Q. Use of CNP Funds

1. Funds for the operation of the NSLP, SBP, and SMP shall not be used to subsidize any other CNP; i.e., the CACFP and/or the SFSP. The same bank account may be used for all CNPs as long as a separate audit trail is maintained using the applicable OCAS codes for each program.
2. The standard for allowable expenditures of a nonprofit school food service is that it represents allowable costs under applicable federal cost principles and program regulations. (Reference USDA Policy Memo 2001-SP-04) These principles are established so that items of employee compensation may be allowed to the extent that:
  - a. **The costs must be necessary and reasonable for the services rendered.** Reasonableness is a matter of professional judgment. The cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.
  - b. **The cost must conform to written established policies of the governmental or private nonprofit organization.** Fringe benefits must be granted based on written policies. Additionally, a governmental unit is defined as **an entire state, local, or federally recognized tribal government, including any component thereof.** Components of governmental units may function independently of the governmental unit in accordance with the terms of the award. Applications of this definition that satisfy the criteria include, but are not limited to, the following:

- The bonuses or fringe benefits represent an integral part of the personnel compensation policy of the SFA, city, town, or other local governmental entity. In this respect, the bonuses or fringe benefits need not be available to all classes of the governmental unit's employees; their availability to any class of employees must simply represent official policy.
  - The school board or other elected governing body has budgeted for the fringe benefit. Such an official action would make the fringe benefit a *de facto* element of the SFA's personnel compensation policy.
  - An official responsible for the school food service organization has the discretionary authority to award the fringe benefit or bonus.
- c. ***Costs must be charged in relation to benefits received.*** Revenues received by the nonprofit SFSA may only be used for the operation or improvement of such food service. Consequently, no charges may be made to the nonprofit SFSA for salaries, fringe benefits, or bonuses which are not related to the time these employees have worked on behalf of that account.
- d. ***Costs must be applied uniformly to federal and nonfederal activities.*** A school food service operation may encompass both federal and nonfederal activities. The nonfederal activities may include catering, à la carte, adult meals, vending, concessions, etc. So long as any fringe benefits or bonuses are applied uniformly to employees for their federal and nonfederal activities, this requirement would be met.
3. Program regulations state, in part, that all **REVENUES** received by the CNP in any participating SFA shall be used only for the operation or improvement of such CNP.
- a. The regulations also define revenue as all monies received by or accruing to the CNP including, but not limited to, children's payments, earnings or investments, other local revenues, state revenues, and federal cash reimbursements. This means that if CNP funds are used totally or in part for investment purposes, the interest earned from such investments must accrue to the CNP and may be used only for authorized program purposes.
- b. The purchase of tea and/or coffee using CNP funds is an allowable expense as long as the tea and/or coffee is offered to the students. If these items are not available for the students, then they must be purchased as a banquet or catered item. Item P on the next page has more information concerning banquets and catering.
- c. CNP revenues shall not be used to purchase land or buildings or to construct buildings. The interpretation of the term ***construction of buildings*** has been revised to allow the expansion of existing facilities with State Agency written approval, but **NOT** the construction of new buildings. (Reference §210.14[a])
- d. The purchase of materials to improve participation and/or cafeteria appearance is an allowable expense.
- e. The charts on **page C-58** are provided in order for SFAs to calculate how much income per meal is received.
4. CNP funds may be used to pay expenses for meetings where technical information relating to the CNP is disseminated. This means that CNP funds may be used to provide informational materials and light refreshments in conjunction with a site's annual open house that would include a cafeteria open house. A CNP employee must be present, and information about the CNP must be provided. Production records documenting foods used must be completed for the occasion and filed with other monthly records. Additional documentation must include the type of activity, CNP employee present, informational materials provided and topic discussed, and number of persons attending. Refer to Item P on the bottom of this page for more information on banquets/ catering.
5. OMB Circular A-87 states that CNP funds may be used for professional development. This includes registration fees, travel, lodging, and per diem for attendance at professional meetings related to CNPs. However, individual membership dues of professional organizations are prohibited from being paid with CNP funds. CNP funds must be used to benefit the SFA and not an individual.

6. Late payment charges: Late payment charges may not be charged to the nonprofit SFSA, which includes all funds in that account, both state and federal funds. Consequently, SFAs must use other sources to pay any late charges. The late charges may not be paid from the nonprofit SFSA, however represented, whether as a percentage of the late payment or otherwise. (Reference USDA Policy Memo 2002-SP-03)
7. Computer/technological purchases: The acquisition of automatic data processing equipment, whether by outright purchase, rental-purchase agreement, or other method of purchase, is an allowable use of CNP funds. OMB Circular A-87, Appendix B, 19, states that the State Agency must approve all purchases using CNP funds that are more than \$2,500. The State Agency is granting approval for all automatic data processing purchases made by SFAs with CNP funds, as long as the purchases are specifically for CNP. Therefore, individual approvals are no longer necessary.
8. Penalty: Section 10 of Public Law 95-627 prescribes the criminal penalty for the misuse of funds, assets, or property in connection with federal feeding programs. Under this provision, anyone, whether administering the programs or receiving their benefits, who knowingly misuses funds, assets, or property, is subject to state and federal penalties.

R. Banquets/Catering/Adult Cafeterias

SFAs must purchase banquet items by using established procedures. Only *school site function* banquets/catering may be included in the bid and/or price quotes of other CNP purchases. *Nonschool function* banquets/catering must be procured completely separate from other CNP purchases.

Adult cafeterias feeding adults only should be set up as a catering account. The definition of an adult cafeteria is any location in the school used only for adult meal preparation and/or meal service where the foods prepared/served are only for adult consumption and **NOT** student consumption. Records must reflect that all foods are purchased without the procurement power of the cafeteria. USDA Foods must not be used for these meals. CNP funds may be used to purchase the food; however, the total cost of the meal must be recovered. A separate project reporting code must be used to track expenditures and revenues.

All records for both banquets and catering items, whether the function is school or nonschool in nature, must be maintained separately. In addition, the *total cost* of all meals must be recovered, including not only food but also labor, utilities, use of equipment, etc. All meals must be prepared outside regular site preparation hours unless the function is *school-related*. USDA Foods **must not** be used in the preparation of any banquet or catering service unless the function is *school-related*.

S. Equipment Depreciation for Nonexpendable Equipment

Nonexpendable equipment (equipment with an acquisition cost of \$5,000 or more) necessary in the operation of a food service facility are allowable costs when computing the cost of a school lunch and breakfast. They should be included as equipment and depreciated accordingly. This is a requirement under OMB Circular A-87 paragraph 19. (Refer to **page C-59** for the Nonexpendable Equipment Depreciation Schedule.) When automotive equipment is provided from a central source or shared with other users, such costs are allocated on a percentage basis. Food service equipment over 12 years old is considered fully depreciated and **CANNOT** be included in the value of equipment on hand.

1. In order to compute depreciation on a monthly and/or annual basis, the following information is required:
  - a. Acquisition is the net cost of equipment acquired, including any attachments, accessories, or auxiliary apparatus necessary to make it usable.
  - b. Normal installation and delivery costs would be the cost of making the necessary hookup to existing utilities adjacent to the equipment being installed.
  - c. If the acquisition cost is known and the equipment is more than one year old, use the chart below to figure how much of the original acquisition cost can be depreciated.
  
2. When the original acquisition cost is unknown, the following procedure may be used to estimate acquisition cost:
  - a. Obtain the current cost of replacing each item of food service or major kitchen equipment that will be used in the program for which the acquisition cost is unknown. This can be obtained from a local supplier, based on the item's cubic footage, energy source, etc.
  - b. Determine the age of each item of food service or major kitchen equipment for which an estimate is to be made.
  - c. Locate the multiplication factor in the chart below based on the age as determined.

**FACTOR CHART FOR COMPUTING DEPRECIATED ACQUISITION COST**

AGE IN YEARS	1	2	3	4	5	6	7	8	9	10	11	12
MULTIPLICATION FACTOR	1	.96	.92	.88	.84	.80	.78	.76	.74	.72	.70	.68

- d. The estimated original acquisition cost is found by multiplying the current cost, as determined in Item 2a, by the multiplication factor, as determined in Items 2b and 2c. If the estimated original acquisition cost determined is less than \$5,000, do not include it on nonexpendable equipment schedule.
3. Compute depreciation of newly purchased, rebuilt, or used equipment.
    - a. Provisions for depreciation of equipment should not differentiate between a new item and one that has been used.
    - b. Newly acquired used equipment should be listed on the Nonexpendable Equipment Depreciation Schedule (refer to **page C-59**) on a 12-year life expectancy basis. Column 6 would reflect the same figure as Column 5 because the piece of equipment is new.
  4. Obtain a monthly depreciation figure:
    - a. Total the depreciated acquisition costs on the Nonexpendable Equipment Depreciation Schedule.
    - b. From the schedule below, determine the length of service expected annually from the equipment.
    - c. Multiply by the percentage factor applicable for months in service. (Use schedule below.)

**SCHEDULE FOR MONTHLY DEPRECIATION FACTORS  
FOR NONEXPENDABLE EQUIPMENT**

.00694	(12-month school term)
.00757	(11-month school term)
.00833	(10-month school term)
.00926	(9-month school term)
.01042	(8-month school term)
.01190	(7-month school term)

5. Following is an example of equipment depreciation.
  - a. To depreciate a dish machine, the current cost would be \$8,200 from the local supplier. It is determined that this dish machine was acquired seven years ago. The estimated original acquisition cost is determined as follows:

$$\$8,200 \times .78 = \$6,396$$

- b. The acquisition cost to be reported is \$6,396. The dish machine would be depreciated for the 5 remaining years of its 12-year life expectancy.

$$\$6,396 \times .00833 = \$53.27 \text{ or } \$54.00$$

This would be the monthly allowable depreciation cost for the dishmachine for the remaining five years.

- c. Multiply monthly figure by number of months school district operates.

$$\$54.00 \times 10 \text{ (months)} = \$540.00 \text{ (yearly amount to record as Equipment Expenditure through OCAS Codes)}$$

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## LOAN AGREEMENT FOR FOOD SERVICE DEFICITS

This contract and agreement, made and entered into the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, by and between the General Fund, hereinafter referred to as First Party, and the Child Nutrition Program (CNP) account, hereinafter referred to as Second Party, of \_\_\_\_\_ school district, witnesseth:

The First Party contracts and agrees to furnish the Second Party the cost of an amount not to exceed \$ \_\_\_\_\_ as a contingent liability subject to repayment as funds become available from the party of the Second Party. This loan agreement must ensure that the party of the Second Party will use these funds only for the operation and improvement of the nonprofit CNP for children. This loan agreement may include items such as utilities, indirect costs/overhead, and the coverage of end-of-year shortfalls; i.e., salaries, inventory, etc.\*

The Second Party agrees to the loan and to pay as specified the costs of the same shown on the agreement on or before June 30, \_\_\_\_\_.

It is further mutually agreed between the parties hereto, as follows:

1. Any change in services or cost of services shall be made only by mutual agreement of each of the parties hereto in writing by attaching a copy of such change or changes to this contract as an addendum thereto.
2. Rights and obligations of the parties hereto shall be governed by the United States Department of Agriculture (USDA) Policy Memo 93-SP-23 and federal and state laws.
3. This contract and all provisions hereto shall be binding upon the successors and assigns of the parties hereto insofar as the parties may bind their successors and assigns under the laws of the state of Oklahoma.

Witness our hands the day and year first above written.

\_\_\_\_\_  
Clerk/Board of Education  
(General Fund Manager)

\_\_\_\_\_  
Child Nutrition Program Manager

Subscribed and  
sworn to before me \_\_\_\_\_, \_\_\_\_\_

My commission expires \_\_\_\_\_, \_\_\_\_\_

\_\_\_\_\_  
Notary Public

\* If utilities and indirect costs/overhead are to be paid from the CNP account, it must be a part of this contract.

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**Child Nutrition Programs E-Claims System  
Claim for Federal Reimbursement**

<b>SFA</b>	<b>County</b>	<b>District</b>	<b>Month</b>	<b>Year</b>

**1. GENERAL DATA**

<i>Number of Sites Participating</i>		<i>Number of Enrolled Students Who Have Access to a Meal</i>		
Lunch: _____	On-Site and On-Site Virtual Free: _____	Off-Site Virtual Free: _____		
Breakfast: _____	On-Site and On-Site Virtual Reduced: _____	Off-Site Virtual Reduced: _____		
Severe Need Breakfast: _____	On-Site and On-Site Virtual Paid: _____	Off-Site Virtual Paid: _____		
Days Operated This Claim Period: _____				

- Site Name: \_\_\_\_\_
- This site is claiming students who are not enrolled (visiting, adult education, or out-of-home placement).
- This site is claiming preprimary students who are not enrolled (preprimary children under the age of four).

**2. LUNCH AND SNACK**

<b>Lunches Served</b>		<b>After-School Snacks Served</b>	
Free _____ * _____ = \$ _____	Reduced _____ * _____ = _____	Free _____ * _____ = \$ _____	Reduced _____ * _____ = _____
Paid _____ * _____ = _____	Total _____ * _____ = \$ _____	Paid _____ * _____ = _____	Total _____ * _____ = \$ _____
Adults/Visitors _____	Contract _____	Adults/Visitors _____	Contract _____
		Lunch Reimbursement = \$ _____	Adjustment = _____
		Warrant Amount = \$ _____	

**3. BREAKFAST AND SEVERE NEED BREAKFAST**

<b>Breakfasts Served</b>		<b>Severe Need Breakfasts Served</b>	
Free _____ * _____ = \$ _____	Reduced _____ * _____ = _____	Free _____ * _____ = \$ _____	Reduced _____ * _____ = _____
Paid _____ * _____ = _____	Total _____ * _____ = \$ _____	Paid _____ * _____ = _____	Total _____ * _____ = \$ _____
Adults/Visitors _____	Contract _____	Adults/Visitors _____	Contract _____
		Breakfast Reimbursement = \$ _____	Adjustment = _____
		Warrant Amount = \$ _____	

**4. SPECIAL MILK PROGRAM**

	Special Milk Reimbursement = \$ _____
	Adjustment = _____
	Warrant Amount = \$ _____

**5. REIMBURSEMENT SUMMARY**

<b>Warrant Effective Date</b>	<b>Total Reimbursements</b>	<b>Adjustments</b>	<b>Total Warrant Amount</b>
_____	_____	_____	_____

# INSTRUCTIONS

Claims are due in the State Office by the tenth of the month following the month covered by this report. Each claim shall cover not more than one calendar month of operation. Claim reporting is done by site.

## 1. GENERAL DATA

- Enter the number of sites participating by meal type.
- Enter the highest number of on-site free eligible students during the month. On-site virtual students should be included. (Every student included **MUST** be enrolled in the site and have access to a meal service.) (Students enrolled in adult education courses or out-of-home placement students are not to be reported in the eligible counts.)
- Enter the highest number of on-site reduced-price eligible students during the month. On-site virtual students should be included. (Every student included **MUST** be enrolled in the site and have access to a meal service.) (Students enrolled in adult education courses or out-of-home placement students are not to be reported in the eligible counts.)
- Enter the number of all on-site paid students during the month. (Every student included **MUST** be enrolled in the site and have access to a meal service.) On-site virtual students should be included. (Students enrolled in adult education courses, off-site virtual students, or out-of-home placement students are not to be reported on the claim.)
- Enter the number of days meals were served.

---

Check the appropriate box if the district is claiming students who are not enrolled; i.e., visiting students or preprimary children under the age of four.

---

Name of Site: \_\_\_\_\_

## 2. LUNCH AND SNACK

- Free: Enter the number of lunches served during the month to students who qualify for free meal benefits.
- Reduced: Enter the number of lunches served during the month to students who qualify for reduced meal benefits.
- Paid: Enter the number of lunches served to students who do not qualify for free or reduced-price meal benefits.
- Free: Enter the number of snacks served during the month to students who qualify for free meal benefits.
- Reduced: Enter the number of snacks served during the month to students who qualify for reduced meal benefits.
- Paid: Enter the number of snacks served to students who do not qualify for free or reduced-price meal benefits.
- Enter the total number of lunches and snacks served to all adults/visitors. Do not include cafeteria workers.
- Enter the total number of contract lunches and snacks prepared for or served to children and adults.

## 3. BREAKFAST AND SEVERE NEED BREAKFAST

- Free: Enter the number of breakfasts served during the month to students who qualify for free meal benefits.
- Reduced: Enter the number of breakfasts served during the month to students who qualify for reduced meal benefits.
- Paid: Enter the number of breakfasts served to students who do not qualify for free or reduced-price meal benefits.
- Free: Enter the number of Severe Need breakfasts served during the month to students who qualify for free meal benefits.
- Reduced: Enter the number of Severe Need breakfasts served during the month to students who qualify for reduced meal benefits.
- Paid: Enter the number of Severe Need breakfasts served to students who do not qualify for free or reduced-price meal benefits.
- Enter the total number of breakfasts served to all adults/visitors. Do not include cafeteria workers.
- Enter the total number of contract breakfasts prepared for or served to children and adults.

## 4. SPECIAL MILK PROGRAM

Enter the number of half-pints served.

## 5. REIMBURSEMENT SUMMARY

Automatically calculated.

**CERTIFY BUTTON:** Once the claim has been completed, the authorized representative will need to certify that the information is true and correct.

(NOTE: RCCIs are not required to complete this form.)

**LOW-INCOME STUDENT COUNT REPORT**

County/District Code: \_\_\_\_\_ District Name: \_\_\_\_\_

School Site Information		On-Site Students (Including On-Site Virtual Students) Enrolled and Eligible for Free/Reduced-Price						
Site Code	Site Name	Grade Span Low-High	Site Enrollment Aged 5 through 17	Free/Reduced-Price	Aged 4 and Under	Aged 5 Through 17	Aged 18 and Over	Total Free/Reduced-Price
				Free				
				Reduced-Price				
				Free				
				Reduced-Price				

**INSTRUCTIONS FOR E-CLAIMS SUBMISSION:**

- Once your October claim has a gold lock, click on the Low-Income Report—On-Site Students Only (enrolled students who have access to a meal) (including on-site virtual students). Once opened, complete the information required for each accredited site under your district by clicking on the drop down box and filling in the numbers that represent your school district. Once the site information is completed, click the SAVE button.
- Once the report is SAVED and the numbers on the report added together match your October claim for reimbursement, you will be able to certify your Low-Income Report.
- Once the report is certified, print out a copy, sign it in blue ink, and fax to 405-521-2239. Once faxed, mail the hard copy to the address below.

By signing this report, the superintendent is stating that the number of students counted on this report are **ONLY** students who are **CURRENTLY ENROLLED** and have access to a meal at the district during the month of **OCTOBER**. This report **MUST NOT** include any seniors who graduated last May, any students who left the district **PRIOR** to **OCTOBER 1**, or any students who do not have access to a meal service.

Mail to:  
 State Department of Education  
 Child Nutrition Programs Section, Room 310  
 2500 North Lincoln Boulevard

\_\_\_\_\_  
 Superintendent's Signature Date

\_\_\_\_\_  
 Signature required in blue ink by Title I.

# LOW-INCOME STUDENT COUNT REPORT INSTRUCTIONS

**School Site Information:** Complete the form for each accredited site. When entering the information on the Web site, verify that the site numbers and names are correct. **PLEASE contact 405-521-3327 if there are any discrepancies.** Include the Grade Span that will be the lowest grade to the highest grade for each site. Valid grades are: Early Childhood (EC), kindergarten (KG), and 1 through 12. If **OPENING** a site, please contact the Accreditation Section at (405) 521-3333 before adding the new site to this form.

**Site Code:** Counts must be reported by accredited site number; i.e., 105, 705. If one cafeteria serves more than one school site, report each school site separately—not as one. Every accredited school site must be included. Nonaccredited sites must not be included.

**Site Name:** The name of the site identified by site number in Column 1.

**Grade Span Low-High:** Grades included at site identified in Columns 1 and 2.

**Site Enrollment Aged 5-17:** Current enrollment for **ALL on-site** students at this site **who have access to a meal**, aged 5 through 17 as of **October 1**. Enrolled students who attend a nonaccredited site must be reported at the **ACCREDITED** site they should be attending. This figure must come from the October 1 Accreditation Report.

**NOTE: This information is used for Title I purposes only. The actual statewide Low-Income Report will use TOTAL current enrollment figures verified by the Accreditation Section as of October 1.**

**Students Enrolled and Eligible for Free/Reduced-Price:**

Enter the number of **on-site** students who are **CURRENTLY ENROLLED** and **ELIGIBLE** for **FREE** or **REDUCED-PRICE** meals in the following categories. Enrolled students who attend a nonaccredited site must be reported at the **ACCREDITED** site they should be attending. Ages are as of the month of **October**. **Off-site virtual students or students enrolled in adult education courses or out-of-home placement students are not to be reported on the Low-Income Report.** Adult education classes are those conducted for the following purposes or groups: General Education Development [GED], Temporary Assistance for Needy Families [TANF], English as a Second Language (ESL), family literacy, life skills, etc.)

## STUDENTS ELIGIBLE FOR FREE MEALS

**Aged 4 and Under:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 4 years of age and younger, who are **ELIGIBLE** for **FREE** meals during the month of October.

**Aged 5 Through 17:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 5 through 17 years of age, who are **ELIGIBLE** for **FREE** meals during the month of October.

**Aged 18 and Over:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 18 years of age and older, who are **ELIGIBLE** for **FREE** meals during the month of October.

**Total:** Total number of **CURRENTLY ENROLLED** students who have access to a meal **ELIGIBLE** for **FREE** meals. If entering the information on to the Web site, this figure will be calculated by the system.

## STUDENTS ELIGIBLE FOR REDUCED-PRICE MEALS

**Aged 4 and Under:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 4 years of age and younger, who are **ELIGIBLE** for **REDUCED-PRICE** meals during the month of October.

**Aged 5 Through 17:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 5 through 17 years of age, who are **ELIGIBLE** for **REDUCED-PRICE** meals during the month of October.

**Aged 18 and Over:** Enter the highest number of **CURRENTLY ENROLLED** students who have access to a meal, 18 years of age and older, who are **ELIGIBLE** for **REDUCED-PRICE** meals during the month of October.

**Total:** Total number of **CURRENTLY ENROLLED** students who have access to a meal **ELIGIBLE** for **REDUCED-PRICE** meals. If entering the information on the Web site, this figure will be calculated by the system.

**Submitting the Report:** Click the **Submit** button to save this information at the State Department of Education (the **State Agency**). Print a hard copy, have the district superintendent sign the report in blue ink, and mail the hard copy to the office of Child Nutrition Programs (CNP).

# CHILD NUTRITION OCAS CODE EXPENDITURES WORKSHEET

## FOOD/BEVERAGE EXPENDITURES ONLY

### CHILD NUTRITION OCAS CODING FOR EXPENDITURES

Enter the district's total expenditures for the previous year for Child Nutrition Programs, using PROGRAM CODE 700 FOR PROJECT REPORTING CODES 000, 385, 763, 764, AND 765. **DO NOT UTILIZE PROJECT CODES 766, 768, OR 769 FOR THIS REPORT.**

<b>Total Expenditures for Last Year</b>			\$ 1	-	
<b>Total Labor Expenditures for Child Nutrition</b>			\$	-	To Be Completed by the Institution
Function Code	3120		\$ 2	-	
<b>Less Total Amount of Other Direct Costs</b>			\$	-	
Function Code	3130		\$ 3	-	To Be Completed by the Institution
Function Code	3140		\$ 4	-	
Function Code	3160		\$ 5	-	
Function Code	3180		\$ 6	-	
Function Code	3190		\$ 7	-	

### À la Carte Revenue Calculation

<b>Total Revenue From Last School Year</b>			\$	-	
Revenue Source Code	1710		\$ 8	-	To Be Completed by the Institution
Revenue Source Code	1720		\$ 9	-	
Revenue Source Code	1730		\$ 10	-	
Revenue Source Code	1760		\$ 11	-	
Revenue Source Code	1790		\$ 12	-	
Revenue Source Code	4710		\$ 13	-	
Revenue Source Code	4720		\$ 14	-	
Revenue Source Code	4730		\$ 15	-	
Revenue Source Code	4740		\$ 16	-	
Revenue Source Code	4750		\$ 17	-	
Revenue Source Code	4760		\$ 18	-	
Revenue Source Code	6110		\$ 19	-	
Revenue Source Code	3720		\$ 20	-	

**Percentage of À la Carte Revenue** 0

<b>Total Expenditures Less Labor and Other Direct Costs</b>	\$	-
<b>Total Food/Beverage Expense Less À la Carte %</b>	\$	-

**Total Meals Served From Last School Year** 0

**Number of Lunches Served** 0

<b>Student</b>	21	0	To Be Completed by the Institution
<b>Adult</b>	22	0	
<b>Number of Breakfast</b>			0
<b>Student</b>	23	0	To Be Completed by the Institution
<b>Adult</b>	24	0	

<b>Percentage of Lunch</b>	0	\$
<b>Percentage of Student</b>	0	\$
<b>Percentage of Adult</b>	0	\$
<b>Percentage of Breakfast</b>	0	\$
<b>Percentage of Student</b>	0	\$
<b>Percentage of Adult</b>	0	\$

### Invoice Breakdown Calculations

<b>Invoice Amount</b>	\$ 25	-	To Be Completed by the Institution
<b>Meal Type</b>	<b>Coding</b>	<b>Breakdown</b>	

À la Carte	Reporting Code 000, Function Code 3110	\$	-	
Student Lunch	Reporting Code 000, 385, <i>OR</i> 763 Function Code 3150	\$	-	
Adult Lunch	Reporting Code 000, Function Code 3155	\$	-	
Student Breakfast	Reporting Code 000 <i>OR</i> 764, Function Code 3150	\$	-	
Adult/Contract Breakfast	Reporting Code 000, Function Code 3155	\$	-	

## OCAS CODING AND CHILD NUTRITION HOW TO BREAK DOWN FOOD/BEVERAGE EXPENDITURES SEPARATELY ON INVOICES

School districts only need to enter information requested in the **GREEN** boxes.

**Green Box 1:** Enter the district's total expenditures for the previous year for CNP, using Program Code 700 for Project Recording Codes 000, 385, 763, 764, and 765. **DO NOT UTILIZE PROJECT REPORTING CODES 766, 768, OR 769 IN THIS REPORT.**

**Green Box 2:** Enter the district's total expenditures for the previous year for CNP **LABOR**, using Function Code 3120.

**Green Boxes 3-7:** Enter the district's expenditures for each **Function Code** listed, if applicable, for the previous school year. Refer to the OCAS Codes in the Child Nutrition Manual Compliance Section to identify the individual Function Codes.

**Green Boxes 8-20:** Enter the district's revenues for each Revenue Source Code, if applicable, for the previous school year. Refer to the OCAS Codes in the Child Nutrition Manual Compliance Section to identify the individual Revenue Source Codes.

**Green Boxes 21-22:** Enter the total number of LUNCH meals served to the STUDENTS, and then enter the total number of LUNCH meals served to ADULTS during the previous school year. (Reference: All claims for reimbursement for the previous school year)

**Green Boxes 23-24:** Enter the total number of BREAKFAST meals served to the STUDENTS, and then enter the total number of BREAKFAST meals served to ADULTS during the previous school year. (Reference: All claims for reimbursement for the previous school year)

*Save the data entered above so that it does not have to be reentered each time.*

**Green Box 25:** Enter the total amount of one FOOD/BEVERAGE invoice, FOOD/BEVERAGE invoices added together for one month, or FOOD/BEVERAGE invoices added together for the entire year.

*Once the invoice amount is entered, the coding will show up at the bottom of the document.*

**NOTE:** *labor and Other Direct can be coded to Project Reporting Code 000, 385, 763, or 764, Function Codes 3120 and 3140). It is recommended that all State Match funds (Project Reporting Code 385) be used for Other Direct (Function Code 3140). Districts do need to be aware that any LABOR coded to a Federal Project Reporting Code (763, 764, or any other Project Reporting Code in the 700 series) must pay Teachers' Retirement a matching amount on any salaries of employees who are members of Teachers' Retirement.*

**AVERAGE ADULT LUNCH/BREAKFAST COST  
VERSUS  
ACTUAL ADULT LUNCH/BREAKFAST CHARGE FORMULA**

**Lunch:**  
**Step 1**

$$\frac{\$ \quad \quad \quad}{\text{Free Reimbursement Rate for Lunch Plus the Value of USDA Foods}} - \frac{\$ \quad \quad \quad}{\text{Actual Adult Lunch Charge}}$$

$$= \frac{\$ \quad \quad \quad}{\text{Lunch Difference}}$$

**Step 2**      Record the number of adult lunch meals served at a charge lower than the free reimbursement rate plus the value of USDA Foods. Multiply by the difference as calculated in Step 1.

**Breakfast:**  
**Step 1**

$$\frac{\$ \quad \quad \quad}{\text{Free Reimbursement Rate for Breakfast}} - \frac{\$ \quad \quad \quad}{\text{Actual Adult Breakfast Charge}}$$

$$= \frac{\$ \quad \quad \quad}{\text{Breakfast Difference}}$$

**Step 2**      Record the number of adult breakfast meals served at a charge lower than the free reimbursement rate. Multiply by the difference as calculated in Step 1.

LUNCH MEALS	# OF ADULT MEALS	LUNCH X DIFFERENCE	= \$ VALUE
JULY		\$	\$
AUGUST		\$	\$
SEPTEMBER		\$	\$
OCTOBER		\$	\$
NOVEMBER		\$	\$
DECEMBER		\$	\$
JANUARY		\$	\$
FEBRUARY		\$	\$
MARCH		\$	\$
APRIL		\$	\$
MAY		\$	\$
JUNE		\$	\$
<b>TOTAL LUNCH</b>		\$	\$ *

BREAKFAST MEALS	# OF ADULT MEALS	BREAKFAST X DIFFERENCE	= \$ VALUE
JULY		\$	\$
AUGUST		\$	\$
SEPTEMBER		\$	\$
OCTOBER		\$	\$
NOVEMBER		\$	\$
DECEMBER		\$	\$
JANUARY		\$	\$
FEBRUARY		\$	\$
MARCH		\$	\$
APRIL		\$	\$
MAY		\$	\$
JUNE		\$	\$
<b>TOTAL BREAKFAST</b>		\$	\$ *

\*The total in the \$ *Value* column of both breakfast and lunch **MUST** be added together. This sum is the amount that will be taken into consideration in the Nonprogram Foods calculation for the SFA's adult meals.

# INCOME SOURCES FOR MEALS

## AVERAGE INCOME RECEIVED FOR LUNCH/SNACKS (Including Seamless Summer Lunches, Snacks, and Suppers)

Source	FREE STUDENT	REDUCED- PRICE STUDENT	FULL-PRICE STUDENT		ADULT
			ELEMENTARY	SECONDARY	
Meal Charges		\$	\$	\$	\$
Federal Reimbursement (Total Per Meal)					
State Reimbursement					
<b>TOTAL INCOME</b>	\$	\$	\$	\$	\$

## AVERAGE INCOME RECEIVED FOR BREAKFAST (Including Seamless Summer Breakfasts)

Source	FREE STUDENT	REDUCED- PRICE STUDENT	FULL-PRICE STUDENT		ADULT
			ELEMENTARY	SECONDARY	
Meal Charges		\$	\$	\$	\$
Federal Reimbursement (Total Per Meal)					
State Reimbursement					
<b>TOTAL INCOME</b>	\$	\$	\$	\$	\$

Additional sources of income for all meals include:

- Commodity entitlements (lunch only)
- Local funds; i.e., à la carte



## NONEXPENDABLE EQUIPMENT DEPRECIATION SCHEDULE

### INSTRUCTIONS

1. Check the type of equipment the schedule includes. Keep food service equipment and vehicles purchased on a separate schedule.
2. Describe each piece of equipment.
  - a. List the oldest equipment first, newest equipment last in order that old equipment may be deleted from the top of the list as expiration dates are reached.
  - b. A piece of equipment over 12 years old is considered fully depreciated and cannot be included on the schedule.
3. Enter the serial number and/or size and capacity.
4. Enter the month and year the equipment was put into service. This is the date the life expectancy begins.
5. Enter the acquisition cost of the equipment. In cases where the original acquisition cost is not known, follow instructions on estimating cost as discussed in Item 2 of **page C-46**.
6. Enter expected life termination date:
  - a. Food service equipment—12 years
  - b. Light trucks (empty weight less than 13,000 pounds) and tractor units (over the road)—four years
  - c. Heavy trucks (empty weight 13,000 pounds or more) and trailers—six years
7. Check the reason for the deletion(s) from the schedule, and enter the month and year of the deletion(s).

## **FRESH FRUIT AND VEGETABLE PROGRAM (FFVP)**

The FFVP initially began as a pilot project authorized by Congress in 2002. The tremendous success of this pilot led to the enactment of legislation in 2004 to expand the FFVP and to make it a permanent program under the National School Lunch Act. Effective for the school year beginning July 1, 2008, the Omnibus Appropriation Act provided funds to expand the FFVP to those states, including Oklahoma, that were not previously authorized to participate on a permanent basis. Under the Act:

- States are limited to an amount of \$50-\$75 per enrolled student per year.
- FFVP is a cost-reimbursement program.
- Fresh fruits and fresh vegetables must be served outside the normal mealtimes while school is in session.
- This is not Department of Defense (DOD) Fresh Fruit and Vegetable Program.

The FFVP provides all children in participating schools with a variety of free fresh fruits and fresh vegetables throughout the school day. It is an effective and creative way of introducing fresh fruits and fresh vegetables as healthy snack options. The FFVP also encourages community partnerships to support the schools when they offer free fresh fruits and fresh vegetables to children during the school day.

The goal of the FFVP is to:

- A. Create healthier school environments by providing healthier food choices.
- B. Expand the variety of fresh fruits and fresh vegetables children experience.
- C. Increase children's fresh fruit and vegetable consumption.
- D. Make a difference in children's diets to impact their present and future health.

***Geographic Preference***—The use of statutorily or administratively imposed in-state or local geographic preferences for procurements under USDA entitlement programs is prohibited, except for unprocessed locally grown or locally raised agricultural products. The Food, Conservation, and Energy Act of 2008 (Public Law 110-246, Section 4302), amended Section 9(j) of the NSLA to allow institutions receiving funds through CNP to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products.

When geographic preference is used, an SFA must still get quotes from several farmers when procuring unprocessed locally grown or locally raised agricultural products so that competitors have an opportunity to compete for the bid. The way in which a geographic preference is applied could depend on whether the procurement method is informal or formal. If informal (i.e., falling below the small purchase threshold), an SFA may simply want to approach a minimum of three local producers and obtain price quotes. Competition is ensured by developing a solicitation that contains criteria that all the respondents will be subject to. If the procurement exceeds the small purchase threshold, a formal procurement method must be used that would involve the sealed bidding process (i.e., IFB) or the competitive negotiation process (i.e., RFP). This would entail public notification of the solicitation; however, when procuring locally unprocessed agricultural products, the notification may be focused on the locale in which the school is situated as a criteria of the solicitation. In a situation where the solicitation for locally unprocessed agricultural products is in fact open to offerors beyond the local area, a way in which to apply a geographic preference is to grant preference points to the local farmers who respond to the solicitation. (Reference USDA Policy Memo 2009-SP-11)

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## HEALTHY SCHOOL ENVIRONMENT (WELLNESS POLICY)

### A. Nutrition Education and Training

Oklahoma's food service and nutrition education efforts were augmented with the passage of the Child Nutrition Act of 1977, as amended, creating the NET program. Goals of this federal legislation were to:

1. Teach children the relationship between food and health and encourage good eating habits.
2. Train food service personnel in nutrition and food service management and encourage use of the school cafeteria as an environment for learning about food and nutrition.
3. Instruct educators in nutrition education and in the use of the cafeteria as a learning laboratory.
4. Develop or purchase appropriate nutrition education and training materials and curricula.

To help meet these goals, the United States Department of Agriculture (USDA) created Team Nutrition to produce resource materials available for purchase from the National Food Service Management Institute (NFSMI). In addition, Oklahoma Team Nutrition was created as a part of USDA National Team Nutrition to provide technical assistance and training to Oklahoma Child Nutrition Program (CNP) participants.

All children, teachers, and food service personnel in public or private nonprofit sites and Child and Adult Care Food Program (CACFP) institutions are eligible to participate in Oklahoma Team Nutrition workshops/training and have access to the Oklahoma Team Nutrition Resource Library.

USDA funds all of these programs. If you would like more information on the NET program or on Oklahoma Team Nutrition, please call the SDE at 405-521-3327.

5. Nutrition education materials available upon request:

a. Bread-in-a-Bag supplies

This is a hands-on activity that allows children the opportunity to make their own bread loaf that corresponds with a nutrition education curriculum for teachers and students Grades 3-6. This activity is intended to encourage students to realize the importance of breads and grains in the diet.

b. Oklahoma Team Nutrition Resource Library

The resource library contains a variety of curriculum and videos that are available to CNP participants to be used for nutrition education activities or staff development. The materials may be borrowed for up to two weeks at a time by submitting a Materials Request Form to our office or by calling 405-521-3327.

6. Statewide training

a. Workshops

Workshops and training are available to CNP participants and educators who contribute to improving the nutrition environment for Oklahoma's children. Workshops are presented on an as-needed basis, and some of them are available online.

- b. Application, Approval, Benefit Issuance, Verification, and Meal Counting and Claiming (ABVM) training, annually mandated by USDA for at least one per person SFA, is now available in an online module. This online training is made available as an alternate option to fulfill the requirement other than on-site workshops offered through your Child Nutrition consultant. (Reference Public Law 108-265, Section 126)

Go to the Web site <<http://web20.sde.ok.us/moodle>>, and follow the instructions in the box labeled *Is this your first time here?* on the right. When asked to enter an *enrollment key*, please enter the word *feeding*.

Either of two processes is allowed once the participant enters the site:

- Review each of the slides with accompanying notes, then proceed to the assessment. With a score of 80 percent or above on the assessment, a *Certificate of Completion* may be accessed.
- Go directly to the assessment without reviewing the slide presentation and notes. With a score of 80 percent or above on the assessment, a *Certificate of Completion* may be accessed.
- *With either choice of completion*, the certificate **must be printed** and kept on file with all Child Nutrition documents to verify participation in the training. During any future review/audit process, the *Certificate of Completion* serves as the **proof** of participation for the mandated training.

- c. Technical assistance

The State Agency strives to provide school food authorities (SFAs) and their staffs with quality service and on-site technical assistance. The State Agency has an outstanding staff of area consultants available to offer their expertise and guidance in all areas or issues pertaining to child nutrition. Some of the areas are as follows:

- (1) Qualifying for Severe Need Breakfast (SNB) Program.
- (2) Analyzing meals per labor hour (MPLH) to determine food service labor productivity.
- (3) Determining the highest free and reduced-price eligible students enrolled at school sites.
- (4) Conducting a financial analysis of school food service income and expenditures.
- (5) Conducting a nutrient analysis of site menus and identifying areas of improvement.
- (6) Training new staff in CNP duties.
- (7) Qualifying for the ASSP.
- (8) Completion of the annual NSLP and SBP Application and Agreement and Policy Statements.
- (9) Assistance with the electronic claims software.

## B. Local Wellness Policy

Section 204 of the Healthy, Hunger-Free Kids Act of 2010 (Public Law 111-296) added Section 9A to the Richard B. Russell National School Lunch Act (42 USC 1758b), Local School Wellness Policy Implementation. The provision set forth in Section 204 expands upon the previous local wellness policy requirement from the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants and Children (WIC) Reauthorization Act of 2004 (Public Law 108-265).

The scope of local school wellness policies brings in additional stakeholders in its development, implementation, and review, and requires public updates on the content and implementation of the wellness policies. The intent is to strengthen local school wellness policies so they become useful tools in evaluating, establishing, and maintaining healthy school environments, and to make clear to the public (including parents, students, and others in the community) about the content and implementations of local school wellness policies.

1. The Act requires each local educational agency (LEA) participating in the National School Lunch Program (NSLP) or other federal CNP to establish a local school wellness policy for all schools under its jurisdiction. Each LEA must designate one or more LEA officials or school officials to ensure that each school complies with the local wellness policy. At a minimum, a local school wellness policy must:
  - a. Include goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness.
  - b. Include nutrition guidelines to promote student health and reduce childhood obesity for all foods available in each school district.
  - c. Permit parents, students, representatives of the school food authority (SFA), teachers of physical education, school health professionals, the school board, school administrators, and the general public to participate in the development, implementation, and review and update of the local wellness policy.
  - d. Inform and update the public (including parents, students, and others in the community) about the content and implementation of local wellness policies.
  - e. Be measured periodically on the extent to which schools are in compliance with the local wellness policy, the extent to which the LEA's local wellness policy compares to model local school wellness policies, and the progress made in attaining the goals of the local wellness policy, and make this assessment available to the public.

**NOTE:** Federal legislation requires one school wellness policy *per district*. Team Nutrition just launched a new Web site (<http://healthymeals.hal.usda.gov/school-wellness-resources>) that consolidates school wellness resources in a way that will make them easier to find.

## 2. Six steps for establishing a local school wellness policy

Check to see if your school district or school already has written policies. If so, review them to ensure that they meet current Oklahoma law and federal requirements.

There are no standard procedures for developing a school wellness policy. The following steps, adapted from the National Association of State Boards of Education's (NASBE) *Fit, Healthy, and Ready to Learn*, may get you started.

### a. Step 1: Form a team.

It is important to recognize any existing efforts underway in the school or community. This might help you determine whether a new team is necessary or whether you can establish a local wellness policy through existing efforts. The law requires parents, students, representatives of the SFA (a school food service employee or someone who works directly with the CNP), the school board, school administrators, **teachers of physical education and school health professionals**, and the public to be involved in the process. The SFA may use the school's Healthy and Fit School Advisory Committee and add the required Wellness Policy Team members. **This team must be involved with the development, implementation, and periodic review of the local wellness policy.**

**LEAs are required to designate one or more LEA officials or school officials to ensure that each school complies with the local wellness policy.**

Additional local stakeholders can be invited to join the Wellness Policy Team to provide necessary resources and assist schools in developing appropriate, science-based wellness policies. Examples of potential stakeholders include:

- **Health care providers**, especially pediatricians, dietitians, public health professionals, dentists, and orthodontists.
- **Hospitals and public health departments**, especially those with pediatric services and diabetic clinics.
- **Nonprofit health organizations** such as the American Cancer Society, American Diabetes Association, and the American Heart Association.
- **Physical activity groups** such as the YMCA/YWCA, youth sports leagues, and commercial fitness centers.
- **Community youth organizations** such as Boys and Girls Clubs, Boy/Girl Scouts of America, and faith-based groups for young people.
- **University departments and other governmental agencies**, especially those involved in nutrition, physical activity, and education (e.g., Cooperative Extension Service).

Frequently, members of **EFFECTIVE** policy teams offer a combination of qualities. Often, they:

- Demonstrate interest in improving school nutrition and physical activity in schools.
- Are effective communicators and team players.
- Possess some understanding of the district's policy of procedural requirements.
- Have policy-related experience in the district.

b. Step 2: Assess the needs.

Before making plans to develop policies, you should assess the needs of your students. Look for data on the education and health status of students through the following Web sites:

<[www.cdc.gov/healthyyouth](http://www.cdc.gov/healthyyouth)>  
<[www.actionforhealthykids.org](http://www.actionforhealthykids.org)>

The following resources will help you assess your school's needs:

- **Changing the Scene Improvement Checklist** at <[www.teamnutrition.usda.gov](http://www.teamnutrition.usda.gov)> is a simple checklist to help you take an honest look at where things stand in your school and to help focus on exactly what needs to be done.
- **School Health Index: A Self-Assessment and Planning Guide** at <[www.cdc.gov/healthyyouth](http://www.cdc.gov/healthyyouth)> is the Centers for Disease Control and Prevention's (CDC's) self-assessment and planning guide for physical activity and healthy eating. This tool enables schools to identify the strengths and weaknesses of nutrition policies and programs and to develop an action plan for improvement.
- **Keys to Excellence: Standards of Practice for Nutrition Integrity** at <[www.schoolnutrition.org](http://www.schoolnutrition.org)>. The School Nutrition Association identifies the elements of a quality school nutrition program. This publication provides an easy-to-use evaluation form for assessing program quality and tracking progress.
- **It's Time for Your School's Physical Education Check-Up (PDF)** at <[www.aahperd.org/naspe/pdf\\_files/2004Echecklist.pdf](http://www.aahperd.org/naspe/pdf_files/2004Echecklist.pdf)> offers a checklist of physical activity measurements. It was created by the National Association for Sport and Physical Education.

c. Step 3: Create policies.

A policy provides officially determined objectives that guide the actions of students and employees in the educational system. Policies typically express what should be done, why it should be done, and who should do it. The following resources are available to assist you in wellness policy development.

- ***Making It Happen! School Nutrition Success Stories*** at <[www.cdc.gov/healthyouth/nutrition/making-it-happen](http://www.cdc.gov/healthyouth/nutrition/making-it-happen)> was developed by Team Nutrition and the CDC. Thirty-two success stories are featured, and six specific approaches for improving the nutritional quality of competitive foods are identified.
- ***Fit, Healthy, and Ready to Learn*** at <[www.nasbe.org](http://www.nasbe.org)> is a school health policy guide developed by the NASBE that provides sections on nutrition and physical activity policy development.
- ***Changing the Scene: Improving the School Nutrition Environment—A Guide to Local Action*** at <[www.teamnutrition.usda.gov](http://www.teamnutrition.usda.gov)> was developed by Team Nutrition to help schools take action in improving their nutritional environment.
- ***CDC Model for Coordinated School Health Programs*** at <[www.cdc.gov/healthyouth](http://www.cdc.gov/healthyouth)>. This model identifies strategies most likely to be effective in promoting lifelong healthy eating, physical activity, and overall wellness.

Once local input has been gathered, schools can develop goals and guidelines to address their specific situations.

Goals and guidelines can be developed to best fit the needs and concerns of each local school district—and they may be adopted over time. As the initial goals are met, new nutrition and physical activity goals can be chosen.

The five basic elements which should be addressed in a district's school wellness policy are:

1. **Nutrition Education:** Find lesson plans, activities, tips, strategies, resources, posters, and more to help make healthy eating a fun part of the school.
2. **Nutrition Promotion:** Create school environments that encourage healthy nutrition choices through messages and activities that inspire school community members to take action.
3. **Physical Activity:** Help motivate children to move more and sit less with these physical activity resources.
4. **All Foods Available on Campus:** Include healthy choices on the school campus—whether they be in the cafeteria, school store, vending machines, classroom, or fundraisers.
5. **Other School-Based Activities:** Promote student health and wellness through other activities and programs for the school.

d. Step 4: Public Notification Required

LEAs are required to inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policy. This very important step enlists widespread support for the goals and strategies of your school wellness policy. Steps that can assist you in building this support include:

- (1) Involving those affected by the policy.
- (2) Anticipating, responding to, and involving critics.
- (3) Applying communication strategies.

- (4) Involving other student-serving agencies in the community.
- (5) Involving people from a variety of community groups.

It is important to obtain support from schools and your community in order for the policy to be smoothly adopted and widely implemented. Student involvement is also an important component of building awareness and support. Use the resources in *Changing the Scene* to help educate various audiences about your policy initiative. Enlist local media to spread awareness of the district's needs and community leaders to speak out in favor of the proposed solutions. Be prepared for challenges that may arise, and ensure that all spokespeople for the policy are providing a consistent message. When dealing with the education community, it is helpful to identify the potential benefits the policy can have on student learning and academic achievement.

*Making It Happen* contains numerous success stories of districts that built broad local support for school health policy goals.

e. Step 5: Implement policies.

Developing and adopting a sound policy is only the beginning. The adoption of a policy does not automatically mean that it will be implemented. Implementation requires good planning and management skills, the necessary resources, consistent oversight, and widespread buy-in by the school staff and the local community. Leadership, commitment, communication, and support are the keys to your success.

Implementation can occur all at once or may be phased-in over time. Your team is in the best position to determine which approach is likely to be the most effective in your district.

The attitude of all school personnel, from individuals serving the food to the personnel who stock vending machines, students, coaches, teachers, and administrators, can have a significant effect on the response to the policy. A positive attitude toward new foods, new physical activity options, or other changes from everyone in the school community can make a huge difference.

Marketing can be an important tool for policy implementation. Consider how marketing principles of product, price, placement, and promotion can work to help with policy implementation.

f. Step 6: Measuring Implementation

LEAs are required to periodically measure and make available to the public an assessment on the implementation of the local wellness policy, including the extent to which schools are in compliance with the local wellness policy, the extent to which the local wellness policy compares to the model local wellness policy, and a description of the progress made in attaining goals of the local wellness policy.

A sustained effort by each district is necessary to assure that new policies are faithfully implemented. Periodically assess how well the policy is being managed and enforced. Reinforce the policy goals with school staff. Be prepared to update or amend the policy as the process moves on. The school district or individual schools should celebrate policy success milestones.

Evaluation and feedback are very important in maintaining a local wellness policy. You need to document any financial impact to the school food service program, school stores, or vending machine revenues.

It is also important to assess student, parent, teacher, and administration satisfaction with the new policies. A good evaluation plan does not need to be extensive, formal, or put additional undue burdens on staff that are involved in the process. Through the evaluation process, you will be able to answer some basic questions that are very important to policymakers, students, school staff, parents, and the general public:

- ***What changes to nutrition education, nutrition promotion, physical activity, all foods available on campus, other school-based activities, and other aspects covered by the policy occurred in each school as a result of the district wellness policy?***

For example:

- Did the number of students participating in nutrition education change?
- Are more nutritious foods available at the beginning of the serving line?
- Did the students have a different number of minutes of physical activity?
- Did any of the campuses change available food options?
- Have there been other health and wellness activities added to the school curriculum?
- Did participation in the SBP or NSLP change?

- ***Did the policy and implementation address the issues identified in the needs assessment?***

For example:

- Is it making a difference?
- What is working?
- What is not working?

- ***How can the impact of the policy be increased to enhance its effect on student health and academic learning?***

Schools may use a variety of methods to measure the implementation of their wellness policy. For example, the school may want to use a checklist or assign implementation dates to its goals and objectives. In addition, the SFA could use the original needs assessment used prior to establishing the wellness policy to evaluate whether changes have been implemented and progress has been made.

#### g. Monitoring Process by State Agency

Through the Administrative Review process, the State Agency must assess how the LEA implements its local wellness policy responsibilities. Districts should keep the following *supporting documentation* on file:

- 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 the district's efforts to review and update the local school wellness policy, including the indication of who is involved in the update and methods the district uses to make stakeholders aware of their ability to participate
- A copy of the district's most recent assessment on the implementation of the local school wellness policy
- Documentation demonstrating the district's most recent assessment on the implementation of the local school wellness policy has been made available to the public

#### C. Healthy and Fit Kids Committee

Oklahoma Statutes Section 24-100a of Title 70 enacted the Healthy and Fit Kids Act of 2004. By September 1, 2004, each school site was required to establish a Healthy and Fit School Advisory Committee.

##### 1. Committee members:

- Must be composed of six members.
- May include teachers, administrators, parents of students, health care professionals, and business representatives.

##### 2. The committee may be combined with the school's Safe School Committee (established in Oklahoma Statute Section 24-100.5 of Title 70).

3. Each Healthy and Fit School Advisory Committee shall study and make recommendations to the school principal regarding:
  - a. Health education.
  - b. Physical education and physical activity.
  - c. Nutrition and health services.

D. Helpful Web Site Addresses/Phone Numbers

1. Food Safety

- a. Food safety links for school and school food service managers and employees: **<http://schoolmeals.nal.usda.gov/Safety/index.html>**
- b. *Serving It Safe: A Manager's Tool Kit*, a training program in safety and sanitation for all levels of food service employees: **<http://schoolmeals.nal.usda.gov/Safety/safe.html>**
- c. Gateway to Government Food Safety Information, includes recall information and food safety tips: **<http://www.FoodSafety.gov>**
- d. Information on commodity holds, recalls, and other food safety information: **<http://www.fns.usda.gov/fdd/foodsafety/foodsafety.htm>**

2. Meal Accountability

- a. Free and reduced-price guidance on the application approval and verification process: **<http://www.fns.usda.gov/cnd/Lunch/F&RP/Default.htm>**
- b. Prototype free and reduced-price applications and translations: **<http://www.fns.usda.gov/cnd/Lunch/F&RP/Spring2002/2002.prototypes.htm>** or **<http://www.fns.usda.gov/cnd/Translations/Default.htm>**

3. Healthy School Environment

- a. Information on improving the school nutrition environment and ordering information for *Changing the Scene*: **<http://www.fns.usda.gov/tn/Healthy/index.htm>**
- b. Statutory and regulatory requirements for foods in competition with school meals: **<http://fns.usda.gov/cnd/Lunch/CompetitiveFoods/fmnv.pdf>** and **[http://www.fns.usda.gov/cnd/Lunch/CompetitiveFoods/competitive\\_foods.report.to.congress.htm](http://www.fns.usda.gov/cnd/Lunch/CompetitiveFoods/competitive_foods.report.to.congress.htm)**

4. Food Safety Program—HACCP

- a. USDA Meat and Poultry Hotline: 1-800-535-4555
- b. FDA Food Information Line: 1-888-SAFE FOOD
- c. USDA Food Safety and Inspection Service **[www.fsis.usda.gov/thermy](http://www.fsis.usda.gov/thermy)**
- d. National Food Service Management Institute (NFSMI)  
The University of Mississippi: 1-800-321-3064  
**[www.nfsmi.org](http://www.nfsmi.org)**

## E. Smart Snacks in School/Competitive Foods

1. The Healthy Hunger-Free Kids Act of 2010 directed USDA to establish Nutrition Standards for all foods and beverages sold to students in school during the school day, including foods sold outside of the meals served through the NSLP and the SBP. The new Smart Snacks in School Nutrition Standards will help schools to make the healthy choice the easy choice by offering students more of the foods and beverages we should be encouraging—whole grains, fruits and vegetables, leaner protein, lower-fat dairy—while limiting foods with too much sugar, fat, and salt. This rule is effective July 1, 2014. To assist districts in determining if a food meets the Smart Snack Rule, go to: <[www.HealthierGeneration.Org/Productcalculator](http://www.HealthierGeneration.Org/Productcalculator)>.
2. Definitions
  - a. School Day—From midnight on any given day when school is in session to 30 minutes past when the last bell rings.
  - b. All Foods—Any foods sold on school premises during the school day, no matter what fund purchased the food. *All foods* includes all foods in snack shops, student stores, vending machines, etc.
3. Nutrition Standards for All Foods Sold in School

NUTRIENT STANDARDS FOR ALL FOODS SOLD IN SCHOOL		
Food/Nutrient	General Standard	Exemptions to the Standard
General Standard for Competitive Food	<p>To be allowable, a competitive <i>FOOD</i> item must:</p> <ol style="list-style-type: none"> <li>1. Meet all of the proposed competitive food Nutrient Standards; <i>AND</i></li> <li>2. Be a grain product that contains 50 percent or more whole grains by weight or have whole grains as the first ingredient*; <i>OR</i></li> <li>3. Have as the first ingredient* one of the nongrain main food groups: fruits, vegetables, dairy, or protein foods (meat, beans, poultry, seafood, eggs, nuts, seeds, etc.); <i>OR</i></li> <li>4. Be a combination food that contains at least 1/4 cup fruit and/or vegetable; or</li> <li>5. Contain 10 percent 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.</li> </ol> <p>* If water is the first ingredient, the second ingredient must be one of Items 2, 3, or 4 above.</p>	<ul style="list-style-type: none"> <li>• Fresh fruits and vegetables with no added ingredients except water are exempt from all Nutrient Standards.</li> <li>• Canned and frozen fruits with no added ingredients except water or are packed in 100 percent juice, extra light syrup, or light syrup are exempt from all Nutrient Standards.</li> <li>• 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.</li> </ul>
NSLP/SBP Entrée Items Sold À 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.	
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	<p>Elementary and middle school: foods and beverages must be caffeine-free with the exception of trace amounts of naturally occurring caffeine substances.</p> <p>High school: foods and beverages may contain caffeine.</p>	

**NUTRIENT STANDARDS FOR ALL FOODS SOLD IN SCHOOL continued**

Food/Nutrient	Nutrient Standard	Exemptions to the Standard
Total Fats	Acceptable food items must have $\leq 35$ percent calories from total fat as served.	<ul style="list-style-type: none"> <li>• Reduced-fat cheese (including part-skim mozzarella) is exempt from the total fat standard.</li> <li>• Nuts and seeds and nut/seed butters are exempt from the total fat standard.</li> <li>• 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.</li> <li>• Seafood with no added fat is exempt from the total fat standard.</li> </ul> <p>Combination products are not exempt and must meet all the Nutrient Standards.</p>
Saturated Fats	Acceptable food items must have $< 10$ percent calories from saturated fat as served.	<ul style="list-style-type: none"> <li>• Reduced-fat cheese (including part-skim mozzarella) is exempt from the saturated fat standard.</li> <li>• Nuts and seeds and nut/seed butters are exempt from the saturated fat standard.</li> <li>• 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.</li> </ul> <p>Combination products are not exempt and must meet all of the Nutrient Standards.</p>
Trans Fats	Zero grams of trans fat as served ( $\leq 0.5$ g per portion).	
Sugar	Acceptable food items must have $\leq 35$ percent of weight from total sugar as served.	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>
Sodium	<p>Snack items and side dishes sold à la carte: <math>\leq 230</math> mg sodium per item as served. Effective July 1, 2016, snack items and side dishes sold à la carte must be: <math>\leq 200</math> mg sodium per item as served, including any added accompaniments.</p> <p>Entrée items sold à la carte: <math>\leq 480</math> mg per item as served, including any added accompaniments.</p>	
Calories	<p>Snack items and side dishes sold à la carte: <math>\leq 200</math> calories per item as served, including any added accompaniments.</p> <p>Entrée items sold à la carte: <math>\leq 350</math> calories per item as served, including any added accompaniments.</p>	<ul style="list-style-type: none"> <li>• Entrée items served as an NSLP or SBP entrée are exempt on the day of or day after service in the Program meal.</li> </ul>

**NUTRIENT STANDARDS FOR ALL FOODS SOLD IN SCHOOL continued**

Food/Nutrient	Beverage Standard	
Beverages	<p><b>Elementary School</b></p> <ul style="list-style-type: none"> <li>• Plain water or plain carbonated water (no size limit).</li> <li>• Lowfat milk, unflavored (≤ 8 fl oz).</li> <li>• Nonfat milk, flavored or unflavored (≤ 8 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements.</li> <li>• 100 percent fruit/vegetable juice (≤ 8 fl oz).</li> <li>• 100 percent fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤ 8 fl oz).</li> </ul> <p><b>Middle School</b></p> <ul style="list-style-type: none"> <li>• Plain water or plain carbonated water (no size limit).</li> <li>• Lowfat milk, unflavored (≤ 12 fl oz).</li> <li>• Nonfat milk, flavored or unflavored (≤ 12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements.</li> <li>• 100 percent fruit/vegetable juice (≤ 12 fl oz).</li> <li>• 100 percent fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤ 12 fl oz).</li> </ul> <p><b>High School</b></p> <ul style="list-style-type: none"> <li>• Plain water or plain carbonated water (no size limit).</li> <li>• Lowfat milk, unflavored (≤ 12 fl oz).</li> <li>• Nonfat milk, flavored or unflavored (≤ 12 fl oz), including nutritionally equivalent milk alternatives as permitted by the school meal requirements.</li> <li>• 100 percent fruit/vegetable juice (≤ 12 fl oz).</li> <li>• 100 percent fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners (≤ 12 fl oz).</li> <li>• 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.</li> <li>• 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.</li> </ul>	

4. Fundraisers

- The sale of food items that meet nutrition requirements at fundraisers are not limited in any way under the standards.
- The standards do not apply during nonschool hours, on weekends, and at off-campus fundraising events.

5. **Nonfood Rewards**

Read a book.  
Sit by friends.  
Read outdoors.  
Teach the class.  
Have extra art time.  
Enjoy class outdoors.  
Have an extra recess.  
Play a computer game.  
Read to a younger class.  
Get a *No Homework* pass.  
Sing a silly song together.  
Make deliveries to the office.  
Listen to music while working.  
Play a favorite game or puzzle.

Earn play money for privileges.  
Walk with a teacher or principal.  
Start and maintain a vegetable garden.  
Dance to favorite music in the classroom.  
Get a *Free Choice* time at the end of the day.  
Listen with a headset to a book on audiotape.  
Have a teacher perform special skills (i.e., sing).  
Be first in line when the class leaves the room.  
Have a teacher read a special book to the class.  
Take a trip to the treasure box  
Watch a video.  
Enter a drawing for donated prizes.  
Receive a video store or movie theater coupon.

6. **Healthy Ideas**

**Things to Sell**

*Made in Oklahoma* products  
School event planners/calendars  
Discount coupon books  
Plants, bulbs, and flowers  
School spirit items  
Greeting cards  
Crafts  
Student artwork  
Football or basketball seats  
Gift wrap  
Holiday wreaths  
Gift certificates  
Books and cookbooks  
Football or basketball game shoutouts  
Christmas ornaments  
First-aid kits  
Emergency kits for cars  
Rent a parking space  
Bumper stickers  
License plate holders  
Gift baskets  
Halloween insurance  
Brick memorials  
Hats  
Newspaper space  
Stationery  
School supplies

**Things to Do**

Walk-a-thons  
Bike-a-thons  
Rent-a-teen helper  
Fun runs  
Car wash  
Gift wrapping  
Singing telegrams  
Talent shows  
Read-a-thons  
Carnivals  
Dances  
Festivals  
Recycling  
Golf tournament  
Bowling night  
Skate night  
Magic show  
Scavenger hunt/treasure hunt  
Tennis shoe/horseshoe pitching competition  
Raffle  
Craft fairs  
Family game night  
3 on 3 basketball tournaments  
Silent auctions

## 7. *Smart Snacks in School Nutrition Standards* Questions and Answers

### **What do the new *Smart Snacks in School Nutrition Standards* do?**

The new standards will allow schools to offer healthier snack foods for our children while limiting junk food served to students. Students will still be able to buy snacks that meet common sense standards for fat, saturated fat, sugar, and sodium while promoting products that have whole grains, lowfat dairy, fruits, vegetables, or protein foods as their main ingredients.

It is important to note that USDA has no role in regulating foods brought from home. The standards do not apply to any foods brought to school in bagged lunches or for birthday parties and special events, including after-school bake sales and fundraisers.

### **How will the new standards impact school revenue?**

At least 39 states currently have some kind of competitive foods standard already in place. In addition, thousands of schools have already taken voluntary steps to enact competitive food standards that meet or exceed those released in the new Smart Snack Rule. The new standards establish a consistent national baseline that will allow every student to enjoy the benefits of healthy snack food choices while providing greater certainty for food and beverage companies.

Exact revenue dollar figures vary by individual states, school districts, and individual schools. But USDA's review of the existing evidence on revenue impacts indicates that on a national scale, any changes would most likely be very minimal—in the range of 1 percent of total school food revenues.

### **How will food and beverage options be impacted by the new standards? What products will be in, and what products will be out?**

It is important to note that the new standards do *NOT* apply to foods brought to school in bagged lunches or for activities such as birthday parties, holidays, and other celebrations. The intent of the standards is not to limit popular snack items, but instead to provide snack foods for students that are healthier. For example, chips would still be allowed, in healthier versions such as baked tortilla chips, reduced-fat corn chips, and baked potato chips.

### **How will the new standards affect fundraising by school groups?**

According to USDA research, more than half of all schools currently do not allow fundraisers that sell sweet or salty foods.

And while only a small amount of snack foods are sold by school groups, USDA recognizes that revenues from school stores, vending machines, and occasional fundraisers can play an important role in supporting student clubs, parent/teacher organizations, and booster groups. That is why the new standards offer a significant amount of flexibility on food items sold by these groups:

- All foods that meet the standards could be sold during fundraisers during school hours.
- The standards do not apply to items sold during nonschool hours, weekends, or off-campus fundraising events such as concessions during sporting events and school plays.

**Do these standards prevent children from bringing cookies to school on their birthdays or special events?**

USDA has no role in regulating foods brought from home. These standards only affect foods that are sold on school campus during the school day. Time-honored traditions like treats for birthdays or foods at an after-school sporting event are not subject to these standards.

**How will the foods provided as part of the school meal, but sold separately as à la carte items, be affected by these standards?**

Based on extensive public comments and feedback from school food service personnel, the new standards exempt individual entrée items offered as part of lunch or breakfast from all competitive food standards when sold à la carte the day of or the day after they are served as part of a reimbursable meal.

**What is a combination food?**

A combination food is defined as a product that contains two or more components representing two or more of the recommended food groups: fruit, vegetable, dairy, protein, or grains. If a combination food does not meet the general standards by being: (1) A grain product that contains 50 percent or more whole grains by weight or have whole grains as the first ingredient; **OR** (2) Having one of the nongrain major food groups as a first ingredient (fruits, vegetables, dairy, protein food); **OR** (3) A food that contains 10 percent of the Daily Value of a nutrient of public health concern from the DGA (i.e., calcium, potassium, vitamin D, or dietary fiber), then such a combination food must contain 1/4 cup of fruit and/or vegetable. Combination foods must also meet the specific Nutrient Standards specified in the Smart Snacks rule. Examples of combination foods are blueberry muffins, stew, pizza, lasagna, etc.

**Are any combination foods exempt from the Nutrient Standards?**

There are only two types of combination foods exempt from all or some of the Nutrient Standards. Canned, fresh, and frozen fruits and vegetables that are combined may be exempt from all of the Nutrient Standards as long as there are no added ingredients except water. For example, fresh salsa made from tomatoes, onions, and garlic (with no other ingredients) is exempt from each of the Nutrient Standards.

While combination foods comprised entirely of fruits and/or vegetables are exempt from all of the Nutrient Standards, there are some other combination items that are exempt from a subset of Nutrient Standards. Specifically, items that are made from only dried fruit, nuts, and/or seeds are one specific type of combination food item that is exempt from the total fat standard, saturated fat standard, and the sugar standard as long as such products contain no added nutritive sweeteners or fats. Such products are still subject to the caloric, trans fat, and sodium standards.

**Would two items packaged together as a snack be considered a combination food as long as the package contains 1/4 cup of a fruit or vegetable?**

Yes. For example, a 100-calorie pouch of small chocolate chip cookies (approximately 21 grams) combined with one small banana (approximately 100 grams) is a combination item if packaged and sold together; the cookies contain grain and the small banana is about 1/2 cup of fruit. The nutrients for this example combination are 190 calories, 3 grams of fat (14 percent calories from fat), 1 gram of saturated fat (5 percent calories from saturated fat), 0 gram trans fat, 95 mg of sodium, and 20 grams of sugar (17 percent sugar by weight).

**Would a side salad meet the Nutrient Standards, and/or is it considered to meet the standards as a combination food?**

A side salad may qualify based either on the first ingredient being a vegetable or as a combination food. For example, 1 cup of romain lettuce, 1/4 cup sliced cucumbers, 8 cherry tomatoes, 4 croutons, and 1 tablespoon of low-calorie Caesar dressing (that contains 57 calories, 1 gram of fat (16 percent of calories from fat), 0 gram saturated fat, 0 gram trans fat, 191 mg of sodium, and 4 percent sugar by weight) would be allowable.

**May cheese and crackers be sold?**

To meet the general standard, the first ingredient in cheese and crackers packaged together must be either a dairy food or a whole grain. Cheese and crackers must also meet all of the specific Nutrient Standards. If the cheese and the crackers are packaged separately and sold as separate items, reduced-fat cheese or part-skim mozzarella would be exempt from the total and saturated fat standard but subject to all other standards, while the crackers would need to have as the first ingredient a whole grain and meet all other Smart Snacks Nutrition Standards.

**Now that the restrictions on the sale of other beverages during the meal service have been eliminated, may a student select juice or a diet soda instead of milk for a reimbursable meal?**

No, the Smart Snacks rule does not change the meal pattern and Nutrition Standards for the NSLP or the SBP. Milk is one component of a reimbursable meal. The milk component may be declined in the case of Offer versus Serve. However, beverages other than juice and smoothies offered as the fruit or vegetable component of the reimbursable meal would have to be purchased à la carte.

**How can I tell if my 20-fl oz beverage may be sold in high schools?**

Use the Nutrition Facts panel as the guide. Beverages with  $\leq 10$  calories per 20 fl oz may be sold in containers up to 20 fl oz. Additionally, if a beverage is labeled as  $< 5$  calories per 8 fl oz and there are not more than 2.5 servings in the 20-oz container, it may be sold.

**How do you determine if a soy product meets the general standard?**

Soy products such as tofu and textured protein product (TVP) are considered protein foods. If tofu, TVP, or soybean is listed as the first ingredient, the product meets the general standard and then will need to be evaluated to ensure that the product meets the Smart Snacks Nutrient Standards.

Soy nuts are **DRIED** soybeans that fall into both the protein group and the vegetable group. Since the fruit and vegetable Smart Snacks requirements exempt only *fresh, frozen, and canned vegetables with no added ingredients except water*, soy nuts would **NOT** be exempt from the Nutrient Standards. However, even though soy nuts would **NOT** be exempt from all Nutrient Standards as a vegetable, they **WOULD BE** exempt from the total fat, saturated fat, and sugar standards (if they have no added nutritive sweeteners or fat) under the nut/seeds exemption. Remember: Soy nuts are still subject to the caloric, trans fat, and sodium standards.

Fortified soy beverages are allowable milk alternatives in schools and, therefore, only need to adhere to the appropriate beverage standards for Smart Snacks.

**Is a cheese sandwich or a peanut butter sandwich considered an entrée item?**

Yes. A combination meat/meat alternate and whole grain-rich food meets the definition of an entrée item. Cheese or peanut butter alone is not considered to be an entrée; however, when combined with whole grain-rich bread, these sandwiches are entrée items. Unless served as an entrée in the NSLP on that day or the day after, all entrée items must also meet the Smart Snacks general and Nutrient Standards.

**How often may entrées served as part of a reimbursable meal that do not meet the Smart Snacks standards be sold à la carte to students?**

The final rule provides that entrées that have been served as part of the NSLP or SBP reimbursable meal are exempt from the Smart Snacks food standards on the *day of service* in the NSLP and SBP as well as the *day after* such an entrée is served in the NSLP or SBP as part of the reimbursable meal. This means that such entrée items may be sold to students à la carte on the same day that they are served as part of the reimbursable meal as well as the day after such an entrée item has been served as part of the NSLP or SBP meal.

**How do I calculate the percentage of calories from fat contained in an item?**

There are two methods of calculating this percentage based on the information found on the Nutrition Facts label. Both are acceptable, though they may yield slightly different results. The Nutrition Facts label includes total fat in two places: (1) Listed as calories from fat near the top, and (2) Listed in grams with the other nutrients. The percent of calories from fat may be calculated using either number.

To calculate using the calories from fat information, take the calories from fat listed on the label and divide by the total calories, then multiply by 100. Using the Nutrition Facts label example shown here to calculate the calories from fat method, the calculation would be as follows: 50 calories ÷ 140 calories x 100 = 35.7 percent of calories from fat

To use the grams of total fat method, take the grams of fat on the label and multiply by 9 (the calories in each gram of fat), divide that result by the total calories, then multiply by 100. Using the Nutrition Facts label example here, the calculation would be: 5 grams x 9 calories ÷ 140 calories x 100 = 32.14 percent of calories from fat.

<b>Nutrition Facts</b>	
Serving Size 1 oz (28g)	
Servings Per Container 1	
<b>Amount Per Serving</b>	
<b>Calories</b> 140	<b>Calories From Fat</b> 50
<b>% Daily Value*</b>	
<b>Total Fat</b> 5g	<b>8%</b>
Saturated Fat 0.5g	<b>3%</b>
<i>Trans</i> Fat 0g	
<b>Sodium</b> 200mg	<b>8%</b>
<b>Total Carbohydrate</b> 18g	<b>6%</b>
Dietary Fiber 3g	<b>12%</b>
Sugars 2g	
<b>Protein</b> 3g	<b>6%</b>
*Percent Daily Values are based on a 2,000 calorie diet.	

**It appears that these two methods may give different results when calculating the percentage of calories from fat. If so, which calculation should be used?**

These two methods will often provide slightly different results because the FDA has different rounding rules for the labeling of each of these nutrients on the Nutrient Facts label. However, if either method results in less than or equal to 35 percent of calories from fat (do not round the result), the product will meet the total fat standard. The previous example could be sold since the result, using the grams of total fat, is less than or equal to 35 percent of calories from fat.

**How do we calculate the percentage of calories from saturated fat in an item?**

To calculate the percentage of calories from saturated fat, take the grams of saturated fat and multiply by 9 (the calories in each gram of saturated fat), divide that result by the total calories, then multiply by 100. Using the Nutrition Facts label, the calculation would be:  $(0.5 \text{ grams} \times 9 \text{ calories}) \div 140 \times 100 = 3.2$  percent. Do not round the result since the standard is less than 10 percent of calories from saturated fat. A product with up to 9.9 percent of calories from saturated fat will meet the standard.

**How do I calculate the percent of sugar by weight?**

To calculate the percentage of sugar by weight, take the grams of sugar on the Nutrition Facts label and divide that by the total weight of the food in grams. Using the Nutrition Facts label, the calculation would be:  $2 \text{ grams (grams of sugar)} \div 28 \text{ grams (total weight of food)} \times 100 = 7.14$  percent sugar by weight. Total sugar must be no more than 35 percent by weight. Do not round the result.

**What is the trans fat requirement?**

Per FDA labeling requirements, a product must have less than 0.5 gram of trans fat to be labeled as a product that contains 0 gram trans fat. Program operators should only select foods that contain 0 gram of trans fat as stated on the Nutrition Facts label (unless it is a naturally occurring trans fat). This error will be corrected in the final rule. The requirement for Smart Snacks is that a product must be labeled as 0 gram of trans fat (contain less than 0.5 gram) to be allowable, consistent with the FDA labeling requirements.

**May popcorn qualify as a Smart Snack?**

Popcorn is whole grain and may be eligible as a Smart Snack, provided it meets all applicable standards. The ingredient label must list the first ingredient as popcorn to meet the general standard. There are many different types of popcorn available on the market—some with added fats and/or sugars; therefore, the Nutrition Facts label or product specifications must be checked to determine if the product meets the Nutrition Standards.

**If pizza or any other food is sold in a classroom, is it subject to the Smart Snacks rule?**

All food sold to students anywhere on the campus during the school day is subject to the Smart Snacks regulatory requirements. The Smart Snacks standards do not apply to food given to students without the exchange of currency/tokens/tickets or food brought to school by the students for their own consumption.

**Do the Smart Snacks requirements apply if items are sold to someone other than a student?**

The Smart Snacks nutrition requirements apply only when foods outside of the school meal programs are sold or available to be sold to students during the school day, on the school campus, as defined in the rule. The requirements of the rule are not applicable to food sold to nonstudents, such as parents or school faculty/staff members.

**If the school food service sells food items to the school for a special event, such as a school celebration, holiday party, etc., which will not be sold to students, will the Smart Snacks nutrition requirements apply?**

The Smart Snacks Nutrition Standards included in the rule apply only to food *SOLD* to students on the school campus during the school day. If such foods are provided to the students free of charge or *contribution*, or the exchange of any tokens or tickets of any sort, the competitive foods standards do not apply.

**How does this rule impact schools that also participate in the NSLP after-school snack program or any part of the CACFP?**

The Smart Snacks standards are applicable during the school day, which is defined as the midnight before to 30 minutes after the end of the instructional day. If such programs are operated in the school during the school day or if after-school snacks or meals are provided within the 30-minute window after the end of the instructional day, any other food available *for sale* to students at that time must comply with the Smart Snacks requirements.

## MEAL-COUNTING AND MEAL-CLAIMING PROCEDURES

### A. AccuClaim (Accurate Counting and Claiming System)

Federal reimbursement is provided for each meal that meets program requirements and is served to an eligible student. To obtain this reimbursement, site personnel must accurately count, record, and claim the number of meals actually served to students by category; i.e., full-price, reduced-price, and free. Additionally, the number of meals served free and reduced-price and claimed for reimbursement must have adequate documentation on file to support the claim. (Refer to **page C-95** for a self-review of accurate meal-counting and meal-claiming procedures.)

#### 1. Point of Service

Reimbursement shall be based on daily counts taken at the point of service that identify the number of free, reduced-price, and full-price reimbursable lunches served.

*Point of service* is defined as that point in the food service operation where a determination can accurately be made that a reimbursable free, reduced-price, or full-price lunch has been served to an eligible student. The meal-counting and meal-claiming procedures used by the SFA are a local decision. When establishing and evaluating a system for acceptability, always keep in mind the following requirements. ***Attendance records, classroom counts, and/or tray counts cannot be used as an acceptable point of service count.***

The meal-counting system chosen must provide a *point of service* count:

- Of reimbursable meals served (one per eligible student per day).
- By type (free, reduced-price, or full-price).
- Each day.
- Without overtly identifying students' eligibility categories. Codes used on rosters or other forms of exchange, such as tickets or debit cards, must not overtly identify the eligibility category of the student. Use of the following terms or codes are **NOT** allowed.
  - (1) Free, reduced-price, full-price, or paid
  - (2) F, R, or P
  - (3) One-digit numbers

***NOTE: Meals served on weekends may be reimbursed if the school activity on the weekend is an integral part of the curriculum or an actual extension of the school calendar (i.e., make up days to meet minimum hours students must attend). Meals served during vacations ARE NOT reimbursable. (Reference FNS Instruction 786-7, Rev. 2 and 786-9, Rev. 2) Meals are not reimbursable when school is not in session. For example: The school week is 4 days, and Friday is used for remedial purposes only; because Fridays are not part of the regular school calendar, meals served on Fridays are not reimbursable.***

#### 2. Edit Check

***NOTE: The Healthy, Hunger-Free Kids Act of 2010 now requires an Edit Check Worksheet to be completed daily for BOTH breakfast and lunch.***

Before submitting a monthly claim for reimbursement, each SFA shall compare each eating site's daily count against data that assists in the identification and correction of counts in excess of the number of reimbursable lunches served each day by category (free, reduced-price, and full-price). Edit Check Worksheets must be completed by individual eating sites and only include the grades that are eating at that particular site. There is a Site/School Food Authority (SFA) Edit Check Worksheet on **page C-97**.

3. Attendance Factor Notification

The State Department of Education (the *State Agency*) will determine each SFA's attendance factor based on enrollment. *Continue to use your attendance factor from last school year until your new attendance factor is posted in the Profile tab on the eClaims system.*

**EXAMPLE:**

Profile

Authorized Representative: JOHN DOE

Last Name	First Name	Authorized	
Doe	John		<a href="#">Edit</a>
			<a href="#">Edit</a>

Adjustment Percentage: 0.5

Attendance Factor: 0.9445

Special Milk Category: Not Participating in SMP

- 60% Qualifying (Add 2 cents)
- Agency Type 5911
- Seamless Summer

Severe Need Breakfast	Snacks	Provision 2 & 3
<input checked="" type="checkbox"/> SNB 40% All	<input type="checkbox"/> After-School Snacks	<input type="checkbox"/> Provision 2 All
<input type="checkbox"/> SNB 40% Partial	<input type="checkbox"/> Snacks All Free	<input type="checkbox"/> Provision 2 Partial
		<input type="checkbox"/> Provision 3 All
		<input type="checkbox"/> Provision 3 Partial

The following formula is used to calculate the attendance factor:

$$\text{Average Daily Attendance (ADA)} \div \text{Average Daily Membership (ADM)} = \text{Attendance Factor}$$

ADA represents an average of the total number of students in attendance on any particular day in a site.

ADM represents an average of the total number of students currently enrolled on any particular day in a site. This number fluctuates as students come and go. When a student checks out of a site, the student is immediately dropped from membership. If a student is absent ten consecutive school days, the student is automatically dropped from membership. (Refer to Section 232 of Public School Laws Records of Attendance.)

4. On-Site Review—Only required for lunch, but recommended for breakfast

Every school year each SFA with more than one school (eating site) shall perform no less than one on-site review for each site under its jurisdiction. The on-site review shall take place prior to February 1 of each school year. Further, if the review discloses problems with a site's meal-counting or meal-claiming procedures, the SFA shall ensure that the site develops and implements a corrective action plan. Within 45 calendar days of the review, it shall be the SFA's responsibility to conduct a follow-up on-site review to determine that the corrective action plan resolved the problems. Each on-site review shall ensure that the site's claim for reimbursement is based on a *point of service* meal count system and that the meal count system yields the actual number of reimbursable free, reduced-price, and full-price lunches served for each day of operation. **Page C-97** has a sample form for on-site reviews. The on-site review should be conducted by someone with knowledge of program regulations. This requirement may be contracted with an outside source. However, this review must not be conducted by the FSMC if the FSMC is in charge of the meal-counting and -claiming system. (Reference 7 CFR §210.8[a][1] and FSMC Guidance, page 7-2)

## B. Alternate Methods of Meal Counting and Meal Claiming

### 1. Provisions 1, 2, and 3

There are three counting and claiming alternatives that SFAs *MAY* implement to reduce their paperwork burden. SFAs interested in implementing any one of the provisions must contact the State Agency for the appropriate application.

Due to the fact that applications are not obtained by districts participating in one of the provisions after the base year, questions have arisen about how to determine free or reduced-price eligibility for the remaining years of the provision for State Aid, Title I, and other funding formulas. SFAs use base year percentages of children eligible for free or reduced-price meal benefits applied to the total enrollment to determine how many students in the site would qualify for free or reduced-price meals. The percentages established in the base year would be brought forward each year and applied to the current school year's enrollment figures. These figures are calculated by the State Agency once October enrollment data is collected. SFAs *MUST* complete an application on *each site* according to the Educational Directory. *Applications must be received prior to August 1 of the base year.* For districts participating in Provision 2 or Provision 3, a simplified **Edit Check Worksheet for both breakfast and lunch must be completed.** (Refer to **page C-103** for a copy.) (Reference USDA Policy Memo 2001-SP-30)

#### a. Provision 1

What it is:

SFAs of a site having at least 80 percent of its enrolled children determined eligible for free or reduced-price meals may, at its option, authorize the site to reduce annual certification and public notification for those children eligible for free meals to once every two consecutive school years.

How it works:

The following requirements apply:

- SFAs of a site operating under Provision 1 requirements shall publicly notify parents of enrolled children who are receiving free meals once every two consecutive school years and shall publicly notify parents of all other enrolled children on an annual basis.
- The 80 percent enrollment eligibility for Provision 1 shall be based on the site's March enrollment data of the previous school year.
- SFAs of a site operating under Provision 1 shall count the number of free, reduced-price, and full-price meals served to children in that site as the basis for monthly reimbursement claims.
- Before submitting a monthly claim for reimbursement, each SFA shall compare each site's daily count against data that assists in the identification and correction of counts in excess of the number of reimbursable lunches and breakfasts served each day by category (free, reduced-price, and full-price). There is an Edit Check Worksheet on **page C-97**.

#### b. Provision 2

What it is:

SFAs may certify students for free or reduced-price meals for up to four consecutive school years if a site serves meals at no charge to all enrolled children in that site provided that public notification was done and eligibility determinations were made correctly in the base year. The term *base year* means the last year for which eligibility determinations were made and meal counts by type were taken.

If an SFA operating under Provision 2 continues to collect income or SNAP, *Temporary Assistance to Needy Families* (TANF), or *Food Distribution Program on Indian Reservations* (FDPIR) information from households during the nonbase years for *non-National School Lunch Program (NSLP)* or *non-School Breakfast Program (SBP)* purposes, the applications may not be labeled as meal applications or give any indication that meal benefits are contingent upon a household returning the application.

In addition, because information about household income or information about participation in other assistance programs is not a requirement for NSLP or SBP purposes during nonbase years, funds in the nonprofit school food service account (SFSA) may not be used to pay the costs associated with collecting and processing such information.

An SFA operating under Provision 2 may not continue to conduct Direct Certification during the nonbase years *for other purposes* as a NSLP/SBP/Special Milk Program (SMP) request. The National School Lunch Act (NSLA) authorizes student matches with SNAP, TANF, and the Head Start programs *ONLY* for use in determining eligibility for the NSLP and SBP. During the nonbase years, such information is not necessary for operation of the NSLP or SBP. Consequently, any request for Direct Certification matching for purposes other than NSLP/SBP/SMP could not be conducted under NSLA authority nor could nonprofit SFSA funds be used to cover any of the administrative costs.

An SFA operating under Provision 2 that collects and processes meal applications from households and/or conducts Direct Certification during *ANY* nonbase year *MUST* use the approved applications to conduct meal-counting and meal-claiming by type at the point of service during that school year. Essentially, this becomes a new base year and new claiming percentages are established for the new cycle.

How it works:

Sites shall offer reimbursable meals to all students at no charge during the Provision 2 base year. The Provision 2 base year is the first year and is included in the four-year cycle. The following requirements apply:

- Free meals: Participating sites shall serve reimbursable meals, as determined by a *point of service* count, to all participating children at no charge during all four years of the cycle (base year included). Application approval, benefit issuance, and verification take place in the base year only.
- Cost differential: The SFA of a site participating in Provision 2 shall pay, with funds from nonfederal sources, the difference between the cost of serving the meals at no charge to all participating students and federal reimbursement.
- Meal counts: During the base year, even though meals are served to participating students at no charge, sites shall take daily meal counts of reimbursable meals by type (free, reduced-price, and full-price) at the point of service. During the nonbase years, participating sites shall take total daily meal counts (not by type) of reimbursable meals at the point of service. For the purpose of calculating reimbursement claims in the nonbase years, monthly percentages shall be established.

The monthly meal counts of the actual number of meals served by type (free, reduced-price, and full-price) during the base year shall be converted to monthly percentages for each meal type. These percentages shall be derived by dividing the monthly total number of meals served of one meal type (such as free) by the total number of meals served in the same month for all meal types (free, reduced-price, and full-price). The percentages for the reduced-price meal and full-price meal types shall be calculated in the exact same way.

These three percentages calculated at the end of each month of the first school year (base year) shall be multiplied by the corresponding monthly meal count totals for all reimbursable meals served in the second, third, and fourth consecutive school years, and applicable extensions, in order to calculate reimbursement claims for free, reduced-price, and full-price meals each month.

#### Extension of Provision 2:

At the end of the initial cycle and each subsequent four-year cycle, the State Agency may allow a site to continue under Provision 2 for another four years using the claiming percentages calculated in the most recent base year if the SFA can certify that base year records are still available and can establish, through available and approved socioeconomic data, that the income level of the site's population, as adjusted for inflation, has remained stable, declined, or has had only negligible improvement (5 percent or less) since the base year.

Approved sources of socioeconomic data that may be used by SFAs to establish the income level of the site's population are:

- Local data developed or collected by city or county zoning and economic planning offices.
- Unemployment data for the areas from which the site draws attendance, measuring the stability of the income level of the site's population.
- Direct Certification: Show the percentage of enrolled students directly certified in the base year, and compare it to the percentage of enrolled students directly certified in the last year of the current Provision 2 cycle.
- An SFA may collect free and reduced-price meal applications to develop socioeconomic data. Please note that this is a data collection process to establish the socioeconomic level of the site's population and does not require meal counts. The collection of Applications for Free and Reduced-Price Meals for extension purposes must be limited to the final school year in the Provision 2 cycle.

The SFA shall be notified by the State Agency when a site is in the last year of participation under Provision 2. This notification shall be sent to the SFA in February of the last year of participation. Documentation from the SFA to support extending participation must be received by the State Agency no later than August 1 of that same year.

The State Agency shall not approve an extension of Provision 2 procedures in those sites for which the available and approved socioeconomic data does not reflect the site's population; is not equivalent data for the base year and the last year of the current cycle; or shows over 5 percent improvement, after adjusting for inflation, in the income level of the site's population. Approval cannot be made for any site that does not submit the required data by the August 1 deadline.

Sites not approved for an extension shall:

- Return to standard meal-counting and meal-claiming procedures.
- Establish a new base year by taking new Applications for Free and Reduced-Price Meals, making new free and reduced-price eligibility determinations, and taking *point of service* counts of free, reduced-price, and full-price meals for the first year of the new cycle. **NOTE: All meals in the base year under Provision 2 must be served free of charge to all participating students.**

Record-keeping requirements:

SFAs of sites implementing Provision 2 shall retain records related to the implementation of the provision for as long as the entity is operating the provision. Failure to maintain sufficient records shall result in the State Agency requiring the site to return to standard meal-counting and meal-claiming procedures and/or fiscal action for the entire year in which records are not found.

- Base year records: SFAs shall ensure that records which support subsequent year earnings are retained for the base year for sites under Provision 2. Such base year records shall be retained during the period the provision is in effect, including all extensions, and three fiscal years after the submission of the last claim for reimbursement, which employed the base year data. If audit findings have not been resolved, base year records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.
- Nonbase year records: SFAs shall ensure that nonbase year records pertaining to total daily meal count information, edit checks, and on-site review documentation are retained for sites under Provision 2. Such records shall be retained for three years after submission of the final claim for reimbursement for the fiscal year. SFAs that are granted an extension of a provision shall retain records of the available and approved socioeconomic data that is used to determine the income level of the site's population for the base year and years in which extensions are made. Such records shall be retained at the SFA level during the period the provision is in effect, including all extensions, and three fiscal years after the submission of the last claim for reimbursement, which employed base year data. If audit findings have not been resolved, records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.

Upon request, the SFA shall make documentation that supports participation in the provision available at any reasonable time for monitoring and audit purposes.

#### How to Handle Student Mobility Moving From Provision Site

Children from schools participating in a Provision school (including Community Eligibility Provision) who transfer within the same LEA to a school not participating in a Provision must complete a free and reduced-price meal application or can be determined eligible for free meals through the direct certification notification. If a child's direct certification information or an approved application from the previous year is available, that child may receive free meals during the carryover period. In addition, if there is an approved application for another child in the household, that eligibility status can be used.

When a student in a Provision School (including Community Eligibility Provision) transfers to *another school district/LEA*, the new LEA may accept the eligibility determination from the student's former LEA if the eligibility for that student was based on current direct certification (i.e., transfers within the school year in which direct certification was conducted or there is an approved application for other children in the household that do not attend a Provision school. If current eligibility is not available from the sending LEA, the student must either be directly certified by the receiving LEA or submit an application.

c. Provision 3

What it is:

An SFA of a site that serves all enrolled students in that site reimbursable meals at no charge during any period for up to four consecutive school years may elect to receive federal cash reimbursement and commodity assistance for the same level as the total federal cash and commodity assistance received by the site during the last year that eligibility determinations for free and reduced-price meals are made and meals were counted by type—free, reduced-price, and full-price—at the point of service. Such cash reimbursement and commodity assistance shall be adjusted for each of the four consecutive school years based on a comparison of the site’s enrollment in the base year and the site’s enrollment in each consecutive year. The term *base year* means the last year for which eligibility determinations were made and meal counts by type were taken.

Reimbursable meals may be offered to all students at no charge, or students eligible for reduced-price or full-price meal benefits may be charged for meals during the Provision 3 base year. The Provision 3 base year immediately precedes, and is not included in, the four-year cycle.

If an SFA operating under Provision 3 continues to collect income or SNAP/TANF/FDPIR information from households during the nonbase years for *non-NSLP* or *non-SBP* purposes, the applications may not be labeled as meal applications or give any indication that meal benefits are contingent upon a household returning the application.

In addition, because information about household income or information about participation in other assistance programs is not a requirement for NSLP or SBP purposes during the nonbase years, funds in the nonprofit SFSA may not be used to pay the costs associated with collecting and processing such information.

An SFA operating under Provision 3 may not continue to conduct Direct Certification during the nonbase years *for other purposes* as an NSLP/SBP/SMP request. The NSLA authorizes student matches with the SNAP, TANF, and Head Start programs *ONLY* for use in determining eligibility for the NSLP and SBP. During the nonbase years, such information is not necessary for operation of the NSLP or SBP. Consequently, any request for Direct Certification matching for purposes other than NSLP/SBP/SMP could not be conducted under NSLA authority nor could nonprofit SFSA funds be used to cover any of the administrative costs.

An SFA operating under Provision 3 may collect applications for meal benefits and/or conduct Direct Certification during nonbase years for the purpose of requesting an extension of the provision.

An SFA operating under Provision 3 that collects and processes meal applications from households and/or conducts Direct Certification during *ANY* nonbase year *MUST* use the approved applications to conduct meal-counting and meal-claiming by type at the point of service during that school year. Essentially, this becomes a new base and new claiming percentages are established for the new cycle.

How it works:

Meal counts by category (F/R/P) are taken in the base year and submitted to the SA electronically. Once the current school year enrollment is known, the current enrollment is compared to the base year enrollment. Whatever percentage the enrollment increased or decreased from the base year to the current year is applied to the total meal counts by category collected in the base year. Once a total meal count for each category is determined for the current year, a daily meal count is determined by dividing the number of operating days into the number of meals by category.

The following requirements apply:

- Sites shall offer reimbursable meals to all students during the Provision 3 base year. Application, benefit issuance, and verification take place in the base year only.
- Free meals: Participating sites shall serve reimbursable meals as determined by a *point of service* count to all participating children at no charge during nonbase years of operation.
- Cost differential: The SFA of a site participating in Provision 3 shall pay, with funds from nonfederal sources, the difference between the cost of serving the meals at no charge to all participating students and federal reimbursement.
- Meal counts: Participating sites shall take daily meal counts of reimbursable meals served to participating students at the point of service during the nonbase years. Such meal counts shall be retained at the local level. In addition, SFAs must establish a system of oversight using the daily meal counts to ensure that participation has not declined significantly from the base year. If participation declines significantly, the SFA shall provide the site with technical assistance, adjust the level of financial assistance received through the State Agency, or return the site to standard application and meal-counting procedures, as appropriate.

The State Agency shall make annual adjustments for enrollment and inflation to the total federal cash and commodity assistance received by a Provision 3 site in the base year. The adjustments shall be made for increases and decreases in enrollment of children with access to the programs. The annual adjustment for enrollment shall be based on the site's base year enrollment as of October 1 compared to the site's current year enrollment as of October 1.

To the extent that the number of operating days in the current school year differs from the number of operating days in the base year, and the difference affects the number of meals, a prorated adjustment shall also be made to the base year level of assistance as adjusted by enrollment and inflation. Such adjustment shall be effected by multiplying the average daily meal count by type (free, reduced-price, or full-price) by the difference in the number of operating days between the base year and the current year and subtract that number from the meals claimed.

Extension of Provision 3:

At the end of the initial cycle and each subsequent four-year cycle, the State Agency may allow a site to continue under Provision 3 for another four years using the information from the most recent base year if the SFA can certify that base year records are still available and establish, through available and approved socioeconomic data, that the income level of the site's population, as adjusted for inflation, has remained stable, declined, or has had only negligible improvement (5 percent or less) since the base year.

Approved sources of socioeconomic data that may be used by SFAs to establish the income level of the site's population are:

- Local data developed or collected by city or county zoning and economic planning offices.
- Unemployment data for the areas from which the site draws attendance, measuring the stability of the income level of the site's population.

- Direct Certification: Show the percentage of enrolled students directly certified in the base year, and compare it to the percentage of enrolled students directly certified in the last year of the current Provision 3 cycle.
- SFAs may collect Applications for Free and Reduced-Price Meals to develop socioeconomic data of the site's population. Please note that this is a data collection process to establish the socioeconomic level of the site's population and does not require meal counts. The collection of Applications for Free and Reduced-Price Meals must be limited to the final school year in the Provision 3 cycle.

The SFA shall be notified by the State Agency when a site is in the last year of participation under Provision 3. This notification shall be sent to the SFA in February of the last year of participation. Documentation from the SFA to support extending participation must be received by the State Agency no later than August 1 of that same year.

The State Agency shall not approve an extension of Provision 3 procedures in those sites for which the available and approved socioeconomic data does not reflect the site's population; is not equivalent data for the base year and the last year of the current cycle; or shows over 5 percent improvement, after adjusting for inflation, in the income level of the site's population. Approval cannot be made for any site that does not submit the required data by the August 1 deadline.

Sites not approved for an extension shall:

- Return to standard meal-counting and meal-claiming procedures.
- Establish a new base year by taking new Applications for Free and Reduced-Price Meals, making new free or reduced-price eligibility determinations, and taking point-of-service counts of free, reduced-price, and full-price meals for the first year of the new cycle. ***NOTE: All meals in the base year under Provision 3 are not required to be served free of charge to all participating students.***

Record-keeping requirements:

SFAs of sites implementing Provision 3 shall retain records related to the implementation of the provision for as long as the entity is operating the provision. Failure to maintain sufficient records shall result in the State Agency requiring the site to return to standard meal-counting and meal-claiming procedures and/or fiscal action for the entire year in which records are not found.

- Base year records: SFAs shall ensure that records that support subsequent year earnings are retained for the base year for sites under Provision 3. Such base year records shall be retained during the period the provision is in effect, including all extensions, plus three fiscal years after the submission of the last claim for reimbursement, which employed the base year data. If audit findings have not been resolved, base year records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.
- Nonbase year records: SFAs shall ensure that nonbase year records pertaining to total daily meal count information, edit checks, and on-site review documentation are retained for sites under Provision 3. In addition, SFAs shall ensure that nonbase year records pertaining to annual enrollment data and number of operating days which are used to adjust the level of assistance are retained. Such records shall be retained for three years after submission of the final claim for reimbursement for the fiscal year. SFAs that are granted an extension of a provision shall retain records of the available and approved socioeconomic data which is used to determine the income level of the site's population for the base year and years in which extensions are made. Such records shall be retained at the SFA level during the period the provision is in effect, including all extensions, and three fiscal years after the submission of the last claim for reimbursement which employed base year data. If audit findings have not been resolved, records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit.

Upon request, the SFA shall make documentation which supports participation in the provision available at any reasonable time for monitoring and audit purposes.

### How to Handle Student Mobility Moving From Provision Site

Children from schools participating in a Provision school (including Community Eligibility Provision) who transfer within the same LEA to a school not participating in a Provision must complete a free and reduced-price meal application or can be determined eligible for free meals through the direct certification notification. If a child's direct certification information or an approved application from the previous year is available, that child may receive free meals during the carryover period. In addition, if there is an approved application for another child in the household, that eligibility status can be used.

When a student in a Provision school (including Community Eligibility Provision) transfers to *another school district/LEA*, the new LEA may accept the eligibility determination from the student's former LEA if the eligibility for that student was based on current direct certification (i.e., transfers within the school year in which direct certification was conducted or there is an approved application for other children in the household that do not attend a Provision school. If current eligibility is not available from the sending LEA, the student must either be directly certified by the receiving LEA or submit an application.

## 2. Community Eligibility Provision (CEP)

What it is:

SFAs are reimbursed for the total number of meals served from the percentage of directly certified students from enrollment.

By April 1 of each year, the SA will publish the number of directly certified students by site as indicated in the WAVE along with each site's enrollment.

The SFA will edit the figures and certify them as true and correct if participation is desired.

- Each site, group of sites, or the entire SFA must be 40 percent or more directly certified students.
  - Enrollment includes only students who have access to a meal service.
  - Identified directly certified student: any student who qualifies for free meal benefits without an application.
- Any sites, group of sites, or entire SFA participating must offer both breakfast and lunch, and all meals are served free of charge to all students. Nonfederal source funds shall be used to pay the difference between the cost of serving the meals at no charge to all participating students and the federal reimbursement.
- No application can be collected or approved for meal benefits. **CATEGORICAL** meal counts are no longer maintained.

How it works:

For each site, groups of sites, or entire SFAs participating, the total number of reimbursable meals served by type (breakfast and lunch) will be multiplied by the percentage of directly certified students times 1.6. These meals will be paid at the free reimbursement rate. The remaining meals will be paid at the paid reimbursement rate.

**NOTE: If the site, groups of sites, or SFA participates in an After-School Snack Program, the same rules apply. (No longer will all snacks be reimbursed at the free rate if the site was 50 percent or more free and reduced-price.**

or sites, groups of sites, or entire SFAs that reach 62.5 percent of directly certified students, all meals are paid at the free reimbursement rate.

It is recommended that sites, groups of sites, or entire SFAs be at 50 to 55 percent directly certified students in order to be financially viable. Although CEP sites do not take categorical counts, an edit check to document **TOTAL** meal counts is required. Refer to **page C-103** for a copy of the Edit Check Worksheet for both breakfast and lunch.

#### Extension of CEP:

Applications are taken each spring for the percentage of directly certified students by site, groups of sites, or entire SFAs as of April 1.

This percentage is used for the following four school years unless this site, groups of sites, or entire SFA's directly certified percentages increase as of April 1 in any of the four years. If an increase occurs, the site, groups of sites, or entire SFA may use the increased percentage. If the directly certified percentage decreases, then the initial percentage can be used for the entire four years.

In the fourth year, the site, groups of sites, or entire SFA must recalculate the directly certified percentage for the next four-year period. The percentage must be 40 percent or more for participation to continue, at which point the cycle would begin again.

Sites, groups of sites, or entire SFAs are encouraged to continue direct certification efforts during all four years of participation so that the fourth-year directly certified percentage will not fall below the 40 percent mark.

#### How to Handle Student Mobility Moving From Provision Site

Children from schools participating in a Provision school (including Community Eligibility Provision) who transfer within the same LEA to a school not participating in a Provision must complete a free and reduced-price meal application or can be determined eligible for free meals through the direct certification notification. If a child's direct certification information or an approved application from the previous year is available, that child may receive free meals during the carryover period. In addition, if there is an approved application for another child in the household, that eligibility status can be used.

When a student in a Provision school (including Community Eligibility Provision) transfers to *another school district/LEA*, the new LEA may accept the eligibility determination from the student's former LEA if the eligibility for that student was based on current direct certification (i.e., transfers within the school year in which direct certification was conducted or there is an approved application for other children in the household that do not attend a Provision school. If current eligibility is not available from the sending LEA, the student must either be directly certified by the receiving LEA or submit an application.

CEP Calculator: See **page C-109** for a formula to assist schools in detecting how much money, if any, could be lost.

### C. Alternatives to Meal Service Times (Nontraditional Meal Service)

#### 1. Exemptions to the Traditional Lunch Period (Strictly Optional for Each SFA)

- a. The primary standard for allowing meals to be served outside the regulatory time period is that the site is operating for traditional students at a nontraditional time. The United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) has approved exemptions contingent upon the understanding that:

- These alternative programs provide students of high school grade or under an opportunity to obtain the minimum requirements needed for graduation at a nontraditional time.
  - It is not possible to serve lunch at a more traditional time. For example, some work-study programs allow high school students to work in the morning or afternoon hours and attend high school classes in the late afternoon or evening.
- b. Although State Agency approval is required to initially begin claiming reimbursement for these meals, it is not necessary for each program to seek approval each year if the conditions upon which approval was initially granted remain unchanged. However, if the conditions upon which approval was granted change, the reimbursable status of the meal service would then need to be reexamined. (Reference USDA Policy Memo 2002-SP-14)
2. Claiming Adult Students (Reference USDA Policy Memo 2002-SP-08)

The key issue for adult participation in the CNP is enrollment, not whether the adults are attending some classes or whether they are part of an Even Start Literacy Program. The adult either must be enrolled in General Educational Development (GED) classes during the regular school day in accordance with USDA Policy Memo 776-7 or otherwise be enrolled in an education unit of high school grade or under, in accordance with the definition of *Child* in 7 CFR §210.2. Any adults meeting these criteria who wish to obtain free or reduced-price meal benefits under CNP must have a completed and approved application on file with the SFA. Under no circumstances can evening meals served to students in GED courses be reimbursable. GED students are **NOT** included in the number of free and reduced-price eligibles reported on the monthly claim for reimbursement or the Low-Income Student Count Report.

3. Out-of-Home Placement Students

Meals served to out-of-home placement students can be claimed for reimbursement. These are students who attend an institution administered by a public school that is not in the attendance area of their home SFA. In order to claim the meals for these students at the free or reduced-price rate, the serving SFA must have an approved application on file to verify that the student qualifies for such benefits. The SFA claiming the meals of out-of-home placement students does **NOT** include these students in the number of free or reduced-price eligibles reported on the monthly claim for reimbursement or the Low-Income Student Count Report because they are to be reported by their home district.

4. Virtual Students

Meals served to virtual students can be claimed for reimbursement if and when the students are on school grounds. **Virtual students must have access to meal services in order for the SFA to distribute and approve free and reduced-price applications.** In order to claim the meals for these students at the free or reduced-price rate, the SFA must have an approved application on file to verify that the student qualifies for such benefits.

5. Claiming Meals Served in Alternative Sites

There are two different options to consider if several different SFAs have enrolled students attending the same alternative school.

- a. One SFA assumes responsibility for all students.

Under this option, the SFA assuming responsibility would claim reimbursement for meals served to students attending the alternative school. The designated SFA would add the alternative school as a site on the *Schedule A* of the NSLP Agreement. The site code could be anything in the 700 Series. A copy of each student's Application for Free and Reduced-Price School Meals would be kept with the designated SFA's records, and the designated SFA would claim the number of meals served to each student by category each month along with all the other meals served to their enrolled students. The students qualifying as free or reduced-price at the alternative school **would not** be included in the number of free eligibles or reduced-price eligibles reported on the designated SFA's claim for reimbursement each month because these students are not **ENROLLED** in that SFA. The SFAs in which the students are enrolled **WOULD** report their students as part of **THEIR** free and reduced-price eligible count even though they would not claim any meals served to these students.

All NSLP requirements, including record keeping, Offer versus Serve, as well as safety and sanitation at the alternative school eating site, would be the responsibility of the SFA preparing, serving, and claiming the meals, just as it is with any other site listed on the district's Schedule A. Any purchases needed to be made for the alternative site (such as insulated delivery carts) could be purchased with school food service program funds.

- b. One SFA contracts with the other SFAs to provide meal service.

Under this option, one SFA would sign a contract with each student's home SFA (one contract per SFA). The contract would specify that the SFA providing the meal service would serve the required meal pattern to the students from each of the other SFAs. The contract should establish a daily time frame in which each contracting SFA reports to the preparing SFA the number of meals to be ordered each day. Each contracting SFA would be invoiced on a monthly basis for the total number of meals ordered during the invoice period. The contracting SFAs would be responsible for paying for the number of meals **ORDERED**, regardless of whether the meal was served.

The preparing SFA would be responsible for reporting to each contracting SFA the number of meals served to its students. Each contracting SFA would then claim the number of meals **SERVED** on its own monthly claim. The preparing site would report the meals as contract meals on its claim.

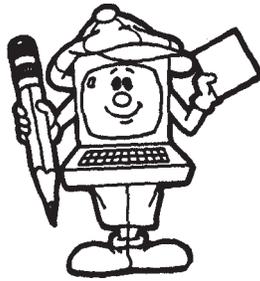
The charge established for these contract meals must **NEVER** be less than the cost of preparing the meals.

The preparing SFA is ultimately responsible for all NSLP requirements. Each of these requirements should be stated in the contract. The signed contract ensures each SFA that the meals its students receive will, in fact, meet requirements and therefore can be claimed for reimbursement. The prototype contract can be found on **page C-105**.

## 6. Claiming Meals for Visiting Students

- a. The SFA in which the students are visiting would obtain copies of the visiting students' free or reduced-price eligibility information from the SFA where the students are enrolled. The visiting students qualifying as free or reduced-price **would not** be included in the number of free and reduced-price eligibles reported on the claim for reimbursement; however, the **MEALS** served to these visiting students could be claimed for reimbursement according to their categorical eligibility.
- b. The SFAs in which students are enrolled would receive verification that reimbursable meals were served from the SFA in which the students are visiting. The SFA in which the students are enrolled would categorically claim the meals served to these students and reimburse the SFA where the visiting students were served. SFAs may want to have a contract in this situation. The SFA feeding the visiting students may want to invoice the SFA in which the students are enrolled.

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Lunch  
 Breakfast

### DO YOU HAVE AN ACCEPTABLE MEAL-COUNTING SYSTEM AT THE POINT OF SERVICE?

Answer the following questions about your counting system. If the answer to any of these questions is **YES**, your counting system is **NOT** acceptable and must be revised (unless approved as an alternative system by the State Department of Education [the *State Agency*]).

- |     |                          |    |                          |     |  |
|-----|--------------------------|----|--------------------------|-----|--|
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 1.  | Are claims based only on meal counts taken in the morning in the classroom or at any other location before the meal is served?   |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 2.  | Are claims based on attendance records?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 3.  | Are meal counts based on the number of tickets or tokens sold and distributed or the number of meals paid in advance?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 4.  | Is the number of free and reduced-price meals claimed based on the number of students eligible to receive such meals?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 5.  | Are meal counts by category taken at the beginning of the serving line without checking that the meals served are reimbursable?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 6.  | Are meal counts by category based on visual identification of students with no backup system available for persons not familiar with the students; e.g., checklists?                 |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 7.  | Are meal counts based on tray or plate counts?   |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 8.  | Are back-out systems used that subtract one number (e.g., number of free and reduced-price meals) from the total count to get another number (e.g., the number of full-price meals)? |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 9.  | Are the students who are eligible for meal benefits overtly identified?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 10. | Is this a system that does <b>NOT</b> yield a reliable, accurate count of meals served by category?  |
| YES | <input type="checkbox"/> | NO | <input type="checkbox"/> | 11. | Is a meal count being taken as the student actually receives his/her meal?   |

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## SITE/SCHOOL FOOD AUTHORITY (SFA) EDIT CHECK WORKSHEET

1. Site: \_\_\_\_\_ 3. Attendance Factor (AF): \_\_\_\_\_
2. Month: \_\_\_\_\_ 4. Total Daily Membership is the sum going across Columns 6, 10, and 14 on any given day.

5. Day of Month	6. Highest Enrolled Free Eligibles for Claim (Plus Only)	7. Daily Free Eligibles (Plus and/or Minus)	8. Daily Free Eligibles x AF	9. Free Meals Claimed	10. Highest Enrolled Reduced-Price Eligibles for Claim (plus Only)	11. Daily Reduced-Price Eligibles (Plus and/or Minus)	12. Daily Reduced-Price Eligibles x AF	13. Reduced-Price Meals Claimed	14. Paid Eligibles (Plus Only)	15. Daily Paid Eligibles x AF	16. Paid Meals Claimed	17. Total Meals Claimed Daily	18. (Average) Daily Attendance	19. Comments
1														
2														
3														
4														
5														
6														
7														
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31														
20. Monthly Totals:														

21. Signature: \_\_\_\_\_ 22. Date: \_\_\_\_\_

**Reminder: If the school is computerized, a roster, including the add/drop lists, must be printed at the end of every month and should match the last numbers in Columns 6 and 10.**

## SITE/SCHOOL FOOD AUTHORITY (SFA) EDIT CHECK WORKSHEET INSTRUCTIONS

All students must be enrolled and have access to meal services in order for the SFA to distribute and approve free and reduced-price applications.

Edit Check Worksheets must be completed by individual eating sites and only include the grades that are eating at that particular site. It must be completed separately for both the breakfast and lunch meal services. Indicate which meal service it is for at the top of the page.

1. Site: Record the name of the eating site.
2. Month: Record the month and year.
3. Attendance Factor (AF): Record the AF for the school food authority (SFA).
4. Total Daily Membership: This is the sum going across Columns 6, 10, and 14 on any given day. If the SFA needs a total monthly membership, use the last day of the month.
5. Day of Month: Locate the day of the month, and begin recording on the corresponding line. The site may wish to highlight any weekends, holidays, or professional days when the site was closed.
6. Highest Enrolled Free Eligibles for Claim: Record the current number of enrolled students eligible for free meal benefits on the first serving day of the month. These students may or may not actually participate in lunch; i.e., Special Milk applications, Head Start co-ops. Each day, add any newly enrolled students who are eligible for free meal benefits. Do not deduct any students who withdraw during the month since this column is used to determine the highest number of free eligibles for the overall month. The number of enrolled free eligibles on the last day of the month is to be reported on the claim for reimbursement. **On-site virtual students who have access to a meal service should be included.** (Students enrolled in adult education courses, **off-site virtual students**, or out-of-home placement students are not to be reported on the claim. Adult education classes are those conducted for the following purposes or groups: General Educational Development [GED], Temporary Assistance for Needy Families [TANF], English as a second language [ESL], family literacy, life skills, etc.) If a student is dropped during any month, that student has already been reported as free for the entire month; therefore, he or she must not be counted again if the student reenrolls during the same month.

**NOTE:** Any students who withdrew during this month need to be dropped after the last serving day of this month before starting next month's Site/School Food Authority (SFA) Edit Check Worksheet. This number should reflect the number in Column 7 at the beginning of the next month.

7. Daily Free Eligibles: Record the number of on-site students eligible for free lunches each day. This will include enrolled students as well as students who are not enrolled; i.e., visiting students, preprimary children under the age of four, adult education students, out-of-home placement, and virtual students. Daily, add any new students eligible for free lunches and drop any students as they withdraw during the month. Do not include children who are eligible for free benefits but do not participate in lunch as this is a daily check of lunch eligibles; i.e., Special Milk applicants who do not eat lunch, Head Start co-ops who do not eat lunch.
8. Daily Free Eligibles x AF: Multiply the number in Column 7 by the attendance factor recorded on No. 3. **DO NOT ROUND UP.**
9. Free Meals Claimed: Record the total number of reimbursable free lunches served/claimed each day to students.
10. Highest Enrolled Reduced-Price Eligibles for Claim: Record the current number of enrolled students eligible for reduced-price meal benefits on the first serving day of the month. These students may or may not actually participate in lunch; i.e., Special Milk applications, Head Start co-ops. Each day, add any newly enrolled students who are eligible for reduced-price meal benefits. Do not deduct any students who withdraw during the month because this column is used to determine the highest number of reduced-price eligibles for the overall month. The number of enrolled reduced-price eligibles on the last day of the month is to be reported on the claim for reimbursement. **On-site virtual students who have access to a meal service should be included.** (Adult education, **off-site virtual students**, or out-of-home placement students are not included.) If a student is dropped during any month, that student has already been reported as reduced-price for the entire month; therefore, he or she must not be counted again if the student reenrolls during the same month.

**NOTE:** Any students who withdrew during this month need to be dropped after the last serving day of this month before starting next month's Site/School Food Authority (SFA) Edit Check Worksheet. This number should reflect the number in Column 11 at the beginning of the next month.

**SITE/SCHOOL FOOD AUTHORITY (SFA) EDIT CHECK WORKSHEET INSTRUCTIONS continued**

11. Daily Reduced-Price Eligibles: Record the number of on-site students eligible for reduced-price lunches each day. This would include enrolled students as well as students who are not enrolled; i.e., visiting students, preprimary children under the age of four, adult education students, out-of-home placement students, and virtual students. Daily, add any new students eligible for reduced-price lunches and drop any students as they withdraw during the month. Do not include children who are eligible for reduced-price benefits but do not participate in lunch as this is a daily check of lunch eligibles; i.e., Special Milk applicants who do not eat lunch, Head Start co-ops who do not eat lunch.
12. Daily Reduced-Price Eligibles x AF: Multiply the number in Column 11 by the attendance factor recorded on No. 3. **DO NOT ROUND UP.**
13. Reduced-Price Meals Claimed: Record the total number of reimbursable reduced-price lunches served to students and claimed each day.
14. Paid Eligibles: Record the total number of on-site enrolled students who are not approved for free or reduced-price meal benefits. **Never subtract out of this column until the first day of the following month.** **NOTE:** Any students who withdrew during this month need to be dropped after the last serving day of this month before starting next month's Site/School Food Authority (SFA) Edit Check Worksheet.
15. Daily Paid Eligibles x AF: Multiply the number in Column 14 by the attendance factor recorded on No. 3.
16. Paid Meals Claimed: Record the total number of reimbursable paid lunches served to students and claimed each day.
17. Total Meals Claimed Daily: Add together the number of lunches served to students and claimed each day. Add the totals going across in Columns 9, 13, and 16.
18. Average Daily Attendance: Each site has one of two options to calculate the average daily attendance: (a) the actual daily attendance may be obtained each day from the school office and used to compare to the total claimed or (b) the average daily attendance may be calculated by multiplying the attendance factor in No. 3 by the sum of Columns 6, 10, and 14.
19. Comments: Record any comments necessary to explain variations in meal service.
20. Monthly Totals: Add the numbers going down in Columns 9, 13, 16, and 17. Record the totals of the free, reduced-price, full-price, and total meals at the bottom of each column.
21. Signature: The person completing the form must sign the form and accept responsibility for the form's accuracy.
22. Date: The person completing the form must record the date by his or her signature.

**NOTE: The last box in Columns 6 and 10 will be used to report the highest number of free and reduced-price eligibles on the claim for reimbursement each month. The last box in Column 14 will be used to report the number of paid eligibles on the claim for reimbursement each month. SFAs with multiple eating sites will need to consolidate the number of free, reduced-price, and paid eligibles from all eating sites.**

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## ON-SITE REVIEW CHECKLIST ASSESSMENT OF THE MEAL-COUNTING AND -CLAIMING SYSTEM

On-site review is required to be completed by February 1 for lunch sites; however, it is recommended that it also be completed for breakfast sites. The completed review must be maintained at the SFA level.

School Name: \_\_\_\_\_ Review Date: \_\_\_\_\_

SFA Reviewer: \_\_\_\_\_

The following questions are recommended at a minimum to complete the on-site review requirement:

**YES NO**

- |                          |                          |    |   |
|--------------------------|--------------------------|----|---|
| <input type="checkbox"/> | <input type="checkbox"/> | 1. | Is the method used for counting reimbursable meals in compliance with the approved <i>point of service</i> requirement? (Meal counts must be taken at the location where complete meals are served to children, including meals served in the classroom.) |
| <input type="checkbox"/> | <input type="checkbox"/> | 2. | Is the <i>point of service</i> meal count used to determine the school's claim for reimbursement?   |
| <input type="checkbox"/> | <input type="checkbox"/> | 3. | Is the person responsible for monitoring meals correctly identifying reimbursable meals for the menu-planning option selected by the SFA?   |
| <input type="checkbox"/> | <input type="checkbox"/> | 4. | Is the school correctly implementing policies for handling the following (as applicable):   |

**Yes No NA**

- |                          |                          |                          |  |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Incomplete meals?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Second meals?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Lost, stolen, misused, forgotten, or destroyed tickets, tokens, IDs, PINs? |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Visiting student meals?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Adult and nonstudent meals (and identifying program vs nonprogram)?        |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | À la carte?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Student worker meals?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Field trips?   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Charged and/or prepaid meals?  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | Offer versus Serve?  |

- |                          |                          |    |  |
|--------------------------|--------------------------|----|--|
| <input type="checkbox"/> | <input type="checkbox"/> | 5. | Is there a method of identifying nonreimbursable meals (i.e., not meeting meal pattern requirements, seconds, adult meals), distinguishing them from reimbursable meals? |
| <input type="checkbox"/> | <input type="checkbox"/> | 6. | Is someone trained as a backup for the monitor and the meal counter?   |
| <input type="checkbox"/> | <input type="checkbox"/> | 7. | Are there procedures for meal-counting and -claiming when the primary counting and claiming system is not available, and do staff know when and how to implement it?     |
| <input type="checkbox"/> | <input type="checkbox"/> | 8. | Are daily counts correctly totaled and recorded?   |
| <input type="checkbox"/> | <input type="checkbox"/> | 9. | If claims are aggregated, are the meal counts correctly totaled and consolidated?  |

YES NO

- 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 for reimbursement is made? Record today's meal counts by category, and compare to the number of students eligible by category.

<i>Number of Students Approved by Category</i>	<i>Today's Meal Counts by Category</i>
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 EXCEPT for SFAs on Provision 2 in nonbase years or RCCIs with only residential children:**

- 12. Is a current eligibility list kept up-to-date and used by the meal count system to provide an accurate daily count of reimbursable meals *by category* (free, reduced-price, paid)?
- 13. If applicable according to 7 CFR §210.8(a)(3), are edit checks completed and documented that compare the daily counts of free, reduced-price, and paid lunches against the product of the number of children currently eligible for free, reduced-price, and paid lunches, respectively, times an attendance factor (and any discrepancies accounted for)?

**CORRECTIVE ACTION PLAN** (for previous *NO* answers):

**SPECIFY DATE CORRECTIVE ACTION(S) WILL BE IMPLEMENTED:** \_\_\_\_\_

**BY WHOM:** \_\_\_\_\_

**SIGNATURE:** \_\_\_\_\_

School Representative

Title

Date

\_\_\_\_\_

SFA Reviewer

Title

Date

**FOLLOW-UP VISIT (must be conducted within 45 days if corrective action was required):** \_\_\_\_\_

Observations of corrective action implementation:

**SIGNATURE:** \_\_\_\_\_

School Representative

Title

Date

\_\_\_\_\_

SFA Reviewer

Title

Date

Lunch  
 Breakfast

**EDIT CHECKS FOR PROVISION 2/3 AND COMMUNITY ELIGIBILITY**

Site: \_\_\_\_\_ Attendance Factor: \_\_\_\_\_

Month: \_\_\_\_\_ Total Membership as of First Day of Month: \_\_\_\_\_

(1) Total Daily Meals Claimed Per eClaims: \_\_\_\_\_

(2) Day of Month	(3) Actual Daily Total Meal Count	(4) Average Daily Attendance
1		
2		
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
13		
14		
15		
16		
17		
18		
19		
20		
21		
22		
23		
24		
25		
26		
27		
28		
29		
30		
31		

1. Total Daily Meals Claimed Per eClaims: Check eClaims to determine this figure.
2. Day of Month: Locate the date of the month, and begin recording on the corresponding line. The site may wish to highlight any weekends, holidays, or professional days when the site was closed.
3. Actual Total **Lunch/Breakfast** Count: Record actual daily total meal count as taken by the SFA. Compare that number with the number on line 1 to ensure the school is neither overclaiming nor underclaiming.
4. Average Daily Attendance: The average daily attendance may be calculated by multiplying the attendance factor by the total membership. The average daily attendance will be the same number for the entire month.

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7. Provide meals to the receiving site based on the number of meals ordered, with adjustments made as needed.
8. Do not claim reimbursement for all or part of the meals provided to the receiving site under any other program administered by the SDE.
9. Charge/invoice the receiving site, itemizing the number of child/adult meals provided and the total amount owed for each month that meals are provided.

***The site receiving the meals agrees to (Recipient):***

1. Inform the preparing site of the number of meals needed by the receiving site for each meal service. The preparation site will be notified of any adjustments in meals ordered within the predetermined time frame of \_\_\_\_\_.
2. Notify the preparing site of any children who may require special dietary considerations to fulfill their nutritional needs.
3. Pick up or accept meals for each meal service prepared within contractual requirements for the receiving site.
4. Serve meals to children in accordance with Oklahoma State Department of Health guidelines.

**5. Reimburse the preparing site for meals at the following rates:**

- \$ \_\_\_\_\_ For each child's breakfast
- \$ \_\_\_\_\_ For each child's lunch
- \$ \_\_\_\_\_ For each child's snacks
- \$ \_\_\_\_\_ For each adult's breakfast
- \$ \_\_\_\_\_ For each adult's lunch
- \$ \_\_\_\_\_ For each adult's snacks

***MEAL PRICES MUST BE, AT A MINIMUM:***

6. Lunch charge equals free reimbursement rate for lunch plus additional incentive payment plus the value of USDA Foods.
7. Breakfast charge equals free reimbursement rate for regular breakfast.
8. Snack charge equals free reimbursement rate for snack.

***I agree with all provisions of this contract.***

\_\_\_\_\_

(Signature of Preparing Site)

\_\_\_\_\_

(Date)

\_\_\_\_\_

(Signature of Receiving Site)

\_\_\_\_\_

(Date)

Attachments: Meal Pattern Requirements

**CONTRACT MEAL SERVICE**

**DELIVERY RECEIPT**

**(Keep in your monthly folder. USE ONE RECEIPT PER MEAL SERVICE.)**

DATE: \_\_\_\_\_

MEAL TYPE: Breakfast \_\_\_\_\_ Lunch \_\_\_\_\_ After-School Snack \_\_\_\_\_

SITE PREPARING MEAL: \_\_\_\_\_

CHARTER SCHOOL RECEIVING MEAL: \_\_\_\_\_

DELIVERY TIME: \_\_\_\_\_ NUMBER OF MEALS ORDERED/DELIVERED: \_\_\_\_\_

**FOOD ITEMS PREPARED AND QUANTITIES DELIVERED**

Menu	<b>Quantity Delivered:</b> Number of Students _____ Bulk Delivery _____ Number of Adults _____ Preportioned _____	*Crediting/ Portioning Information
<b>Milk</b>	Milk provided by: SITE _____ VENDOR _____ (Circle One) Record Quantity: _____	
<b>Vegetable/Fruit/ Juice</b>		
<b>Bread/Bread Alternate OR Side</b>		
<b>Meat/Meat Alternate</b>		
<b>Extras OR Additional Sides</b>		

\* Crediting/portioning information for food-based menu planning: i.e., 1 cup spaghetti sauce = 2 ounces meat/meat alternate, 6 chicken nuggets = 2 ounces meat/meat alternate and 1 ounce bread/bread alternate serving, 2 cheese sticks = 1 ounce meat/meat alternate.

I acknowledge that the above items and quantities were delivered to this contract site. I did complete the necessary portioning/crediting information. Child Nutrition (CN) labels, product formulation statements, and/or recipes are available for all combination food items or other applicable components.

\_\_\_\_\_  
Signature of Preparer

I acknowledge that the above items and quantities were delivered to this contract site.

INSPECTION DELIVERY: Was the food delivered in a safe/sanitary method? Yes or No  
 Were food temperatures proper? Yes or No

\_\_\_\_\_  
Signature of Recipient

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## CEP CALCULATOR

This form is for:

**Breakfast**

Click here to select Lunch/Breakfast

### **Community Eligibility Provision—Will My School Lose Money?**

This must be done for breakfast and lunch and by site, groups of sites, or district.

The word *meals* is translated to *lunch* when completing this form for lunch meals.

The word *meals* is translated to *breakfast* when completing this form for breakfast meals.

This form can be found in an interactive format in the eClaims System.

**Please only enter information in the GREEN numerical fields.**

<b>Step 1:</b>	
Total Number of Meals Claimed in Previous School Year	
Enter the # of DC Students	
Enter the # of On-Site Enrolled Students	
Percentage of DC Students (Calculated by Dividing DC Students by On-Site Enrolled Students)	
Percentage of Meals to Claim at the FREE Rate (Calculated by Multiplying DC Students by 1.6)	
Number of Meals to Claim at the FREE Rate Under the CEP System (Total # of Meals x % of Meals to Claim at the FREE Rate)	
Enter the Free Rate	
Meal Reimbursement for FREE Meals (Meals to Claim at Free Rate x Free Rate)	
Number of Meals Reimbursed at the PAID Rate	

To determine how many meals will be reimbursed at the PAID rate:

Enter the PAID Rate	
Meal Reimbursement for PAID Meals (Calculated by Multiplying # of Meals at the Paid Rate)	
Total Meal Reimbursement Under the CEP System	

<b>Step 2:</b>			
<b>THIS WOULD BE COMPARED TO WHAT THE DISTRICT WOULD HAVE RECEIVED FOR ITS CATEGORICAL COUNTS FOR THE SAME AMOUNT OF TIME</b>			
	<b>Meals</b>	<b>Rate</b>	
Total Free Meals Claimed in Previous Year; Also Enter the Rate for That Meal			\$ -
Total Reduced-Price Meals Claimed in Previous Year; Also Enter the Rate for That Meal			\$ -
Total Paid Meals Claimed in 2013			\$ -
Total Meal Reimbursement Under SFA's Claiming System (Total of Free, Reduced-Price, and Paid Meals)	\$ -		
CEP Reimbursement versus SFA's Claiming System			
Or Percentage Gain or Loss			

### **Step 3:**

**Figure the amount of PAID student collections and REDUCED-PRICE student collections for the previous year.**

*NOTE: This information must come from the individual school site, groups of sites, or district.*

Paid Student Collections (Entered as a Negative)	
Reduced-Price Student Collections (Entered as a Negative)	
Total Collections (Sum of Paid and Reduced-Price Collections)	
CEP versus SFA's Claiming System Loss/Gain	
The Amount of Funds the Individual School Site, Groups of Sites, or District Would Gain/Lose	

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## SPECIAL MILK PROGRAM (SMP)

- A. In 1954 the Special Milk Program (SMP) was implemented to encourage fluid milk consumption by selling milk to students at the lowest possible price and serving milk free to students determined to be eligible. Beginning in 1961 and continuing through 1986, this program was available only to schools and nonprofit child care institutions not participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). In 1986 the SMP was expanded to include split-session kindergarten children who do not have access to the breakfast and/or lunch programs because of their half-day schedules. The benefits of the program were also extended to preprimary class students who do not have access to the breakfast and/or lunch programs because of their half-day schedules.

School districts that have split-session kindergarten and preprimary students who do not have access to the NSLP and/or SBP may receive reimbursement for milk served to these students. Schools may choose either to serve milk free to students qualifying according to family income, serve milk at a set price to all students, or serve milk free to all students.

1. **Nonpricing Program:** All children are served milk free of charge, and all milk served is claimed for reimbursement at the rate established by the United States Department of Agriculture (USDA).
  2. **Option 1 Pricing Program:** Children whose family size/income falls within the free guidelines are served free milk. Reimbursement is claimed for the average cost of milk served free to eligible children. Children who are not eligible for free milk pay for the milk served, and reimbursement is claimed for paid milk at the rate established by USDA.
  3. **Option 2 Pricing Program:** All children are charged for milk served regardless of family size/income. All milk served is claimed for reimbursement at the rate established by USDA.
- B. Sites **MUST** offer students fluid pasteurized milk in at least two choices of fat content from the following:
- Unflavored or flavored fat-free
  - Unflavored lowfat (1%)
  - Lactose-reduced lowfat (1%) or fat-free
  - Lactose-free lowfat (1%) or fat-free
  - Cultured buttermilk lowfat (1%) or fat-free
  - Acidified milk lowfat (1%) or fat-free

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## STAFFING STANDARDS

As automation of preparing and serving food and use of prepared foods are increased, the staffing standards should be changed to reflect an increase in productivity. Frequently, the automation and prepared or convenience foods are added one at a time (or slowly)—and the labor cost is not reduced. Unnoticed, the work will expand to fill the time available. Consequently, in a short time the staff will argue that it is not possible to do the work with less labor hours. The staffing guidelines are found below.

In most instances, satellite sites that receive their food in bulk for portioning on site, sites that receive cooked or chilled food or cooked or frozen food for finishing off, and sites that receive preplated meals ready to heat and serve or ready to serve will have better productivity than those preparing food on site. Increased productivity rate, or meals per labor hour (MPLH), and reduced labor costs will be realized when the volume prepared at a location is great enough and when there have been reductions in specialized staff; e.g., bakers, cooks, and managers. Satelliting to only one site from another site may not produce sufficient volume to result in savings.

On-site production requires the most labor and has a lower productivity level than efficient satellite systems. As labor costs increase, ways must be found to eliminate the number of labor hours needed to do the job. Many SFAs are examining the many different systems of delivering food and reducing labor hours. The staffing information on the following page shows the average productivity of on-site and finishing kitchens serving 350 lunches. (A finishing kitchen is one that receives all food prepped, or prepared, ready for heating and serving.)

### Sample Staffing Guidelines for On-Site Production

NUMBER OF EQUIVALENTS*	MEALS PER LABOR HOUR (MPLH)/TOTAL HOURS			
	CONVENTIONAL SYSTEM**		CONVENIENCE SYSTEM***	
	MPLH	TOTAL HOURS	MPLH	TOTAL HOURS
10 - 100	12	8	16	6
101 - 150	12	08 - 12	16	06 - 09
151 - 200	12	12 - 16	16	09 - 12
201 - 250	14	14 - 17	17	12 - 14
251 - 300	14	17 - 21	18	14 - 16
301 - 400	15	20 - 26	18	17 - 21
401 - 500	16	25 - 31	19	21 - 25
501 - 600	17	29 - 35	20	25 - 30
601 - 700	18	33 - 37	22	27 - 31

\* Meal equivalents include breakfast and à la carte sales. Two breakfasts equate to one lunch, and three snacks equate to one lunch. À la carte sales of \$2.99 or \$3.01 equate to one lunch.

\*\* The conventional system is preparation of food from raw ingredients on the premises (using some bakery bread and prepared pizza and washing dishes).

\*\*\* The convenience system is using the maximum amount of processed foods (for example: using all bakery breads, breaded chicken, proportioned condiments, and using disposable dishes).

## Staffing for an Elementary Site With On-Site Production

Number Serving.....	350 Lunches
.....	40 Breakfasts
Staffed at.....	12 Meals Per Labor Hour
Labor Hours.....	31 Labor Hours

Manager .....	7 Hours
Baker .....	5 Hours
Cook .....	6 Hours
Cashier .....	3 Hours
Salads/Server .....	5 Hours
Dish Washer/Assistant .....	5 Hours
<b>TOTAL LABOR HOURS</b> .....	<b>31 Hours</b>

**NOTE:** If 31 hours @ \$8.50 (including fringe benefits), labor costs are \$263.50, or \$.75 per lunch.  
 If 31 hours @ \$12.88 (including fringe benefits), labor costs are \$399.28, or \$1.08 per lunch.

## Staffing for an Elementary Site With a Finishing Kitchen

Number Serving.....	350 Lunches
.....	40 Breakfasts
Staffed at.....	26 Meals Per Labor Hour
Labor Hours.....	14 Labor Hours

Manager .....	6 Hours
.....	(Breakfast)*
Server/Preparation .....	5 Hours
Cashier .....	3 Hours
<b>TOTAL LABOR HOURS</b> .....	<b>14 Hours</b>

**NOTE:** If 14 hours @ \$8.50 (including fringe benefits), labor costs are \$119.00, or \$.32 per lunch.  
 If 14 hours @ \$12.88 (including fringe benefits), labor costs are \$180.32, or \$.49 per lunch.

\*Manager comes in an hour early and serves breakfast.

## STAFFING STANDARDS EXAMPLE

(See the back of this example for a blank form to use to calculate your district's staffing standards.)

Use the following data to determine the meals per labor hour (MPLH):

Number of days in sample month	=	22	
Total number of breakfasts in sample month	=	5,720	
Total number of lunches in sample month	=	7,150	
Total number of snacks in sample month	=	3,500	
Average number of daily lunches served	=	<u>325</u>	(7,150 divided by 22)
Average adjusted number of daily breakfasts served (2 breakfasts = 1 lunch)	=	<u>130</u>	(2,860 divided by 22)
Average adjusted number of daily snacks served (3 snacks = 1 lunch)	=	<u>53</u>	(1,166 divided by 22)
Number of meal equivalents (average number of lunches plus adjusted number of breakfasts and adjusted number of snacks)	=	<u>508</u>	
4 food service workers work 6 hours each	=	<u>24</u>	hours
1 manager works 8 hours, but 2.5 is allotted to paperwork	=	<u>5.5</u>	hours
		<u>29.5</u>	hours

---

<u>508</u>	divided by	<u>29.5</u>	=	<u>17.22</u>
Number of Meal Equivalents		Number of Labor Hours		Meals Per Labor Hour (MPLH) or Productivity Rate

You can compare this information with the staffing chart on [page C-113](#). Other factors to be considered in evaluating staffing pattern are equipment, menus, extent of à la carte, etc.

## STAFFING STANDARDS

Use the following data to determine the meals per labor hour (MPLH):

- Number of days in sample month = \_\_\_\_\_
- Total number of breakfasts in sample month = \_\_\_\_\_
- Total number of lunches in sample month = \_\_\_\_\_
- Total number of snacks in sample month = \_\_\_\_\_
- Average number of daily lunches served = \_\_\_\_\_
- Average adjusted number of daily breakfasts served (2 breakfasts = 1 lunch) = \_\_\_\_\_
- Average adjusted number of daily snacks served (3 snacks = 1 lunch) = \_\_\_\_\_
- Number of meal equivalents (average number of lunches plus adjusted number of breakfasts and adjusted number of snacks) = \_\_\_\_\_
  
- 4 food service workers work 6 hours each = \_\_\_\_\_ hours
- 1 manager works 8 hours, but 2.5 is allotted to paperwork = \_\_\_\_\_ hours
- \_\_\_\_\_ hours

$$\frac{\text{Number of Meal Equivalents}}{\text{Number of Labor Hours}} = \text{Meals Per Labor Hour (MPLH) or Productivity Rate}$$

## STUDENT ISSUES

### A. Failure to Pay for Meals/Charge Policy

The school food authority (SFA) is not required to provide meals if payment is not made for the *CURRENT* day's meal or if funds in a student's account are not sufficient to cover the cost of the meal. A district cannot deny a meal to a student who brings money to school for that day's meals, even though the student may have previous charges. The money brought for today must not be used for previous charges.

It is the responsibility of the SFA to develop a policy regarding students who are required to pay for their meals, but fail to do so. Although it is not required, it is recommended that a written policy regarding charged meals be prepared by each SFA and approved by the district school board. There is no minimum number of charges that need to be extended to the student; however, households should be notified of the SFA's policy. If a family does not pay for *CHARGED* meals, a site may wish to encourage the family to complete an Application for Free and Reduced-Price School Meals. If the family does not wish to complete the application or if they do not qualify for meal benefits after completing the application, the SFA is not obligated to continue providing meals without receiving payment. It is recommended that districts provide a sandwich and milk for any child who does not pay.

Sites are not allowed to withhold grades, records, or any other information owned by the student for meal payments owed.

All students must end the current fiscal year with a zero balance in their Child Nutrition accounts. **SFAs *MUST NOT* deny any meal service in a new school year to students with prior year's charges.** This means that a district's charge policy begins anew each year. However, this does not mean that SFAs cannot continue to attempt recovery of uncollected meal charges. Any monies collected in the new school year should be treated as new revenue. Use the following OCAS Codes: Fund 22 or Fund 11, Project Reporting Code 385, and Source of Revenue Code 1710. Any money lost from uncollected meal charges can be charged off to the school food service account or to the General Fund.

### B. Refunding Unused Prepayments for Meals

Prepayment is the property of the family making the payment until it is charged against any meals taken. Therefore, any prepayments left at the end of the fiscal year must be repaid to the family *if requested*. Any refusal to repay such prepayments would constitute an improper taking of property without due process, which is not allowed by a state or federal entity. Additionally, not refunding any prepayments would effectively increase the price of the meals which, in the case of reduced-price meals, may not exceed 40 cents and, in the case of both full-price and reduced-price meals, may not exceed the stated price in the parent letter that is part of the policy statement. Further, the failure to make refunds would serve as a disincentive for families to make prepayment which detracts from procedures to ensure confidentiality.

SFAs should develop a policy to inform parents how money left in a student's account at the end of the year will be handled. The policy needs to include:

1. A statement that refunds will be made upon request.
2. A statement concerning how, if a request is not made, the money will be handled (i.e., it will be put into the student's account for the next fiscal year—closing the current fiscal year out with a zero balance).
3. A statement concerning how, if the student leaves the school district without requesting a refund, the money will be handled. (For example, if the money is at or below a certain level [\$2.00 or \$3.00, or whatever the district decides], the money will be used as a donation to the CNP. If the amount is more than that, the money will be forwarded to the known address of the student. If the envelope is returned unopened, the money will be treated as a donation to the CNP.)

C. Fees for Credit Card Services (Reference FNS Instruction 782-6, Rev. 1, and USDA Policy Memo 2005-SP-10)

It is common for companies that accept payment for meal services electronically to add a service charge for the processing of such payments. It is acceptable that the organization administering the electronic credits add a service charge for both the full-price and reduced-price eligible students, provided that these students and families have another payment option available to them where there is no service charge, such as with the cashier or the school office. Since there **MUST** be another payment option available with no fees, the provision of FNS Instruction 782-6, Fees for Lunchroom Services, which prohibits additional fees for supervisory or other services, would not apply in this case. Additionally, if the SFA chooses to pay for these online payment charges, it would be an allowable cost out of the nonprofit school food service account. **Note: SFAs must provide students with two methods to purchase their meals. SFAs cannot offer prepayments as the only method.**

D. Disciplinary Action (Reference FNS Instruction 791-1 Rev. 1)

The denial of free, reduced-price, or full-price meals and/or milk as a disciplinary action against any child who is enrolled in a site participating in the CNP is inconsistent with Sections 2 and 9 of the National School Lunch Act (NSLA) and Sections 2, 3, and 4 of the Child Nutrition Act (CNA) of 1966. Disciplinary action that **INDIRECTLY** results in the loss of meals or milk is allowable; e.g., a student is suspended from school. However, when the withholding of meals or milk **IS** the disciplinary action or if the disciplinary action **DIRECTLY** results in the loss of meals or milk, it is inconsistent with the law and is not allowable; e.g., a student is suspended from school during the meal or milk period only.

**SFAs shall:**

1. When considering disciplinary action against any child, ensure that such action is consistent with this policy.
2. Make a reimbursable meal or milk available to any child attending school who, for disciplinary reasons, is not allowed to eat in the cafeteria.

E. Substitutions to the Meal Pattern Requirements

1. Special Medical or Dietary Needs: Documentation of special dietary needs must be on file at the cafeteria manager's office.
  - a. Disabled Students

Generally, children with food allergies or intolerances do not have a disability as defined under either Section 504 of the Rehabilitation Act or Part B of IDEA.

CNP regulations require participating SFAs, institutions, and sponsors to offer to all participants breakfasts, lunches, suppers, snacks, and milk that meet the meal pattern requirements identified in the program regulations. USDA regulations further **REQUIRE** substitutions to the standard meal pattern requirements for participants who are considered disabled under 7 CFR §15(b) and whose disability restricts their diets. The provisions requiring substitutions for disabled participants respond to the requirements of Section 504 of the Rehabilitation Act of 1973 and to USDA's implementing regulations 7 CFR §15(b) which provide that no otherwise qualified disabled individuals shall, solely on the basis of disability, be excluded from participation in, be denied benefit of, or subjected to discrimination under any program or activity receiving federal financial assistance. (Reference FNS Instruction 783-2, Rev. 2)

When, in the licensed physician's assessment, food allergies may result in severe, life-threatening (anaphylactic) reactions, the child's condition would meet the definition of *disability* and the substitutions prescribed by the licensed physician must be made. It is the responsibility of the SFA to pay for any substitutions required. (*For more information on allergy and anaphylaxis label reading, go to <[www.foodallergy.org](http://www.foodallergy.org)>.*)

b. Nondisabled Students

SFAs may, at their discretion, make substitutions for individual participants who are not *disabled persons* as defined in 7 CFR §15(b)(3)(i), but who are unable to consume a food item because of medical or other special dietary needs. This substitution **DOES NOT** include milk. See Item 2 below for milk substitution requirements. Such substitutions may only be made on a case-by-case basis when supported by a statement signed by a recognized medical authority. In these cases, recognized medical authorities may include physicians, physician assistants, nurse practitioners, or other professionals.

2. Milk Substitutions (Nondairy Beverage)

Public Law 108-265, Section 102, states that a school **MAY** substitute for the fluid milk requirement a nondairy beverage that is nutritionally equivalent to fluid milk and meets nutritional standards established by USDA for students who cannot consume fluid milk because of a medical or other special dietary need other than a disability:

Substitutions **MAY** be made if the school notifies the State Agency in its Renewal Policy Statement that the school is implementing this variation. The substitution is required to have a written statement from a medical authority or from a student's parent or legal guardian (refer to **pages C-123 and C-125** to see an example of the Milk Substitution Request Form) that identifies the medical or other special dietary need that restricts the student's diet. The school shall not be required to provide beverages other than beverages the school has identified as acceptable substitutes.

Expenses incurred in providing substitutions that are in excess of expenses covered by reimbursement shall be paid by the SFA.

**NOTE: Only meals that contain milk\* or an acceptable milk substitute are reimbursable unless the school is implementing the Offer versus Serve provision and the student declines the milk.**

\*Sites **MUST** offer students fluid pasteurized milk in at least two choices from the following:

- Unflavored or flavored fat-free
- Unflavored lowfat (1%)
- Lactose-reduced lowfat (1%) or fat-free
- Lactose-free lowfat (1%) or fat-free
- Cultured buttermilk lowfat (1%) or fat-free
- Acidified milk lowfat (1%) or fat-free

a. Fluid milk substitution rule applies to the following CNP:

- National School Lunch Program
- School Breakfast Program
- After-School Snack Program
- Special Milk Program

b. Nondairy beverage nutrient requirements per cup:

- Calcium 276 mg
- Protein 8 g
- Vitamin A 500 IU
- Vitamin D 100 IU
- Magnesium 24 mg
- Potassium 222 mg
- Phosphorus 349 mg
- Riboflavin 0.44 mg
- Vitamin B-12 1.1 mg

c. Acceptable reasons for requesting a milk substitute:

- Milk allergy
- Religious
- Cultural
- Ethical reason
- Vegan diet

***NOTE: If a request states that a child does not like milk, this is not an acceptable reason.***

d. Unacceptable milk substitutions:

- Water
- Juice

***NOTE: When the milk substitution request is due to a medical or special dietary need other than a disability, the school chooses whether to accommodate the student and selects the nondairy beverage in accordance with the final milk substitution rule.***

3. Substitutions Due to Ethnic or Religious Preferences

Sites ***MAY*** consider ethnic and religious preferences when planning and preparing meals. Variations on an experimental or continuing basis in the ***food components*** for the ***food-based*** menu-planning approaches must have written approval from USDA. Contact the State Agency for further instructions. (Reference USDA Regulations §210.10[g][2])

F. Student and Parent Involvement

On August 17, 1979, regulations were signed requiring student and parent involvement in the National School Lunch Program (NSLP). Activities to fulfill this requirement may include menu planning, enhancement of the eating environment, program promotion, and related student-community support activities. USDA is not requiring any specific form of student or parental involvement, but is leaving this to the discretion of the individual SFA.

G. Student Workers

All student workers in the cafeteria must be paid for their labor or can volunteer. However, they cannot be compensated by receiving free meals for their work.

H. Lost, Stolen, or Misused Meal Tickets/Cards

SFAs are required to establish procedures for handling lost, stolen, and misused student meal tickets/cards. Any system that limits the number of tickets must conform to the following:

1. Parents and students must be advised in writing of the school's policy regarding missing meal tickets and of students' corresponding responsibility for their tickets. Such notice shall be provided at the time applications are distributed to households or upon approval for free or reduced-price benefits.
2. A minimum of **THREE** ticket/card replacements, or special meal arrangements resulting from three lost or stolen tickets, must be allowed each student within each school year.
3. The site must maintain a list of students who have reported missing original tickets in the current school year and the number of occurrences for each student. Prior to denying a meal to any student without a ticket, the list should always be reviewed to determine if the student has already had at least three ticket replacements or special meal arrangements for lost or stolen tickets within that school year.
4. At least one advance **WRITTEN** warning must be given to the student and the parents prior to refusal to allow additional meals or ticket replacements. The written warning must include an explanation that the student has repeatedly requested replacement tickets and that each subsequent time the student fails to have a ticket, he or she will be expected to either bring lunch or pay full price for lunch.
5. Meals must always be provided to preprimary and young primary students or to any disabled students who may be unable to take full responsibility for a meal ticket.

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

6. It is recommended that the meal or ticket replacement policy for missing free and reduced-price tickets be extended to the loss of full-price tickets. If such a uniform policy covering both needy and nonneedy students is not implemented, sites must exercise care to preclude the overt identification of needy students when reissuing free or reduced-price meal tickets or making arrangements to provide meals to students whose tickets are missing.
7. Replacement fees may only be charged after the third replacement ticket (card) has been issued, as specified in FNS Instruction 765-7, Revision 2.
8. Ticket (card) replacement costs may not exceed the cost of one paid meal. The cost of one paid meal is interpreted to mean the charge for a full-price student meal.

#### I. Reimbursement for Off-Site Meal Consumption (Reference FNS Instruction 786-8, Revision 1)

Exceptional circumstances exist for students who are enrolled in one school but attend another work-study site for the part of the day that includes the meal hour. Those students applying for free or reduced-price meals should do so through their home-base school since the home-base school would be more familiar with individual circumstances. The work-study school is responsible for the service of meals and the record keeping for meals served and claimed for reimbursement. Therefore, the work-study school should obtain, for its own records, a copy of the Application for Free and Reduced-Price School Meals for any student to whom it serves a free or reduced-price meal. When the work-study site does not participate in the programs, takeout school meals meeting program requirements may be served to such students and claimed for reimbursement by their home-base school. The provision of such meals is at the option of the school, since SFAs are only required to make meals available to students who are present during the meal service period.

In all cases, care must be taken to ensure that accurate, detailed records are maintained, including meal counts for free, reduced-price, and full-price categories.

J. Prohibition on Advance Meal Payments in the NSLP/SBP/SMP (Reference USDA Policy Memos 2000-SP-21 and 2005-SP-10)

The requirement that meals be paid in advance will limit access by imposing an additional criterion for participation. While there must be provision for some type of prepayment and prepayment may be encouraged through discounts, prepayments may not be required. This would apply to electronic payments as well. These payment options must be specified in the SFA's free and reduced-price policy statement.

K. Mealtimes

1. Breakfast

The breakfast meal shall be served at or close to the beginning of the child's day at school. (Reference 7 CFR §220.2[b]) Each individual school district must decide the length of the meal service.

2. Lunch

Schools must offer lunches during the period the school has designated as the lunch period. Schools must offer lunches between 10 a.m. and 2 p.m. (Reference 7 CFR §210.10 [f]) Each individual school district must decide the length of the meal service.

L. Prohibition on Separation by Gender

There has been a longstanding USDA policy discouraging the separation of students by gender in the cafeteria.

Notwithstanding FNS Instruction 113-6 nor the current 113-1, a waiver to allow separate cafeteria seating by gender in the cafeteria is not permissible.

**MEDICAL STATEMENT  
FOR  
CHILDREN *WITHOUT* DISABILITIES  
Requesting Special Foods in Child Nutrition Programs**

**Part I** (to be filled out by SFA or Parent/Guardian)

Name of Student: \_\_\_\_\_ Age: \_\_\_\_\_

Name of Parent/Guardian: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

School District: \_\_\_\_\_ School Attended by Student: \_\_\_\_\_

**Part II** (to be filled out by a recognized Medical Authority)

Diagnosis (include description of the patient's medical or other special dietary needs that restrict the child's diet):

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List food(s) to be omitted from diet:

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List food(s) that may be substituted (diet plan):

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Additional information:

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\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Recognized Medical Authority

Telephone Number: \_\_\_\_\_

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**MEDICAL STATEMENT  
FOR  
CHILDREN WITH DISABILITIES  
Requesting Special Foods in Child Nutrition Programs**

**Part I** (to be filled out by the School District or the Parent/Guardian)

Name of Student: \_\_\_\_\_ Age: \_\_\_\_\_

Name of Parent/Guardian: \_\_\_\_\_ Telephone Number: \_\_\_\_\_

School District: \_\_\_\_\_ School Attended by Student: \_\_\_\_\_

**Part II** (to be filled out by a Physician)

Diagnosis (include description of the patient's disability and the major life activity affected by the disability):

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List food(s) to be omitted from diet:

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List food(s) that may be substituted (diet plan) and any modifications of texture or consistency that are necessary:

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\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Physician

Physician's Telephone Number: \_\_\_\_\_

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## MILK SUBSTITUTION REQUEST

Student's Name: \_\_\_\_\_ Age: \_\_\_\_\_ Grade: \_\_\_\_\_

The \_\_\_\_\_ Public School is participating in the milk substitution provision which states that a school may substitute for the fluid milk a nondairy beverage that is nutritionally equivalent to fluid milk and meets Nutritional Standards established by the United States Department of Agriculture (USDA). At a minimum, the Nutritional Standards shall include fortification of calcium, protein, vitamin A, and vitamin D to levels found in cow's milk for students who cannot consume fluid milk because of a medical or other special dietary need other than a disability.

The \_\_\_\_\_ Public School has notified the State Department of Education (the State Agency) that the school is implementing this variation. The substitution requires a written statement by a medical authority or by a student's parent or legal guardian that identifies the medical or other special dietary need which restricts the student's diet, except that the school shall not be required to provide beverages other than beverages the school has identified as acceptable substitutes.

Acceptable substitutes are as follows:

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Expenses incurred in providing substitutions that are in excess of expenses covered by reimbursements shall be paid by the school district.

For Medical Authority or Parent/Guardian to Complete:

Reason for Milk Substitution: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date

\_\_\_\_\_

Signature of Medical Authority or Parent/Guardian

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## SUMMER MEAL AVAILABILITY

- A. The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, establishes requirements for conducting outreach to households on the availability of Summer Food Service Program (SFSP) meals.

Section 112 of the Act amends Section 13(a) of the Richard B. Russell National School Lunch Act (42 U.S.C. 1761[a]) to require that each SFA cooperates with SFSP service institutions to inform eligible families of the availability and location of free meals for students when the regular school year ends.

Acceptable activities may include developing or disseminating printed or electronic materials to families of school children prior to the end of the school year that provide information on the availability and location of SFSP meals. Other activities to promote the availability and location of SFSP meals may be approved by the State Agency. (Reference USDA Policy Memo SP-04-2011)

- B. Options for Schools Operating Accredited Summer School Sites

A school site operating an accredited summer school as defined in Oklahoma Statute 210:35-15-2, after the regular school year has concluded, has **THREE** options in continuing to feed its students during the summer months:

1. Extend the National School Lunch Program (NSLP)/School Breakfast Program (SBP)/After-School Snack Program (ASSP).

School sites extending these programs follow the same meal pattern requirements and same meal-counting and -claiming procedures as in the regular school year. In sites where these programs are extended, carryover applications from the previous school year are affected. If summer school and meal participation continue into the month of July, the first day of the 30-day operating period for that particular site would begin on the first day summer school is in session in July. Refer to the Eligibility Section for additional information on carryover applications.

2. Operate the Summer Food Service Program for Children (SFSP)

School sites must operate an **OPEN** site under the SFSP. Please see the information below concerning open feeding sites under the SFSP.

3. Operate the Seamless Summer Option

School sites must operate an **OPEN** site under the Seamless Summer Option. Please see the following information concerning open feeding sites under the Seamless Summer option.

- C. Options for Schools **NOT** Operating Accredited Summer School Sites

A school site **NOT** operating an accredited summer school as defined in Oklahoma Statute 210:35-15-2, after the regular school year has concluded, has **many different options** to consider if continuing to feed students during the summer months. Participating in any of the options listed **does not** affect the way the school site uses its carryover applications from the previous school year into the next regular school year. Refer to the Eligibility Section for additional information on carryover applications.

1. Operating the Summer Food Service Program

Schools may operate the SFSP at one or more sites, which are the actual locations where meals are served and children eat in a supervised setting. Eligible sites are those that serve children in low-income areas or specific groups of low-income children. Schools must provide documentation that their proposed sites meet the income-eligibility criteria required by law or use the census tract for documentation of eligibility. The most common types of sites are: open sites, restricted open sites, and closed enrolled sites.

a. Types of Sites—Schools may sponsor the following types of sites:

- (1) Open Site—Children aged 18 and under eat free in the community where at least 50 percent of the children are eligible for free or reduced-price school meals. These sites may be operating an accredited summer school program or a 21st Century Grant Program. An open site may participate in the SFSP without offering any type of educational or enrichment program.
- (2) Restricted Open Site—This is an open site restricted for safety, control, or security, and that meets the 50 percent criteria. Educational or enrichment programs may or may not be offered along with the meal service.
- (3) Closed Enrolled Sites—This site may be in any community for an enrolled group of low-income children, meeting the 50 percent criteria explained previously. This excludes accredited summer school programs, but includes programs such as 21st Century grants, tutoring, etc.

b. Special Types of Sites:

- (1) Migrant Site—This site serves children of migrant families.
- (2) Camps—A site is residential or nonresidential.

c. Basic Requirements:

- (1) Application—SFAs may apply for the SFSP by calling Linda Wren at 405-522-5040. Ms. Wren will set up an appointment to visit the school. The school will receive a Username and Password to access the SFSP system.
- (2) Meals Prepared in Schools (7 CFR 225.16[f][1][i])—Schools participating in the NSLP or SBP are accustomed to preparing meals that meet federal nutritional requirements. Sponsors serving meals that are prepared in schools may, with prior State Agency approval, use the meal requirements of those programs instead of the SFSP meal patterns. Sections 210.10 and 210.10(a) of NSLP regulations and Sections 220.8 and 220.8(a) of SBP regulations describe requirements for school meals.
- (3) Reimbursement—Meals are reimbursed at a higher free reimbursement rate than the Seamless Summer Option. The site reports the number of reimbursable meals served each month and receives a combination of operating and administrative reimbursement. Schools receive the maximum reimbursement by claiming the number of reimbursable meals multiplied by the current rates.

**2014 Rates for Summer Food Service Program for Children**

	<b>Rural or Urban Self-Prep Sites or Rural Vended Sites</b>	<b>Urban Vended Sites</b>	
Breakfast	\$ 2.0225	\$ 1.9850	(Operating and administrative reimbursement rates have been added together)
Lunch/Supper	3.5450	3.4875	
Snack	0.8400	0.8225	

***NOTE: Metropolitan counties include: Canadian (09), Cleveland (14), Comanche (16), Cotton (17), Creek (19), Grady (26), LeFlore (40), Lincoln (41), Logan (42), McClain (47), Oklahoma (55), Okmulgee (56), Osage (57), Pawnee (59), Rogers (66), Sequoyah (68), Tulsa (72), and Wagoner (73). Any SFSP sites located in these counties or any SFSP sites under an FSMC contract will automatically receive the lower (urban-vended) rates.***

- (4) Monitoring by SFA—SFAs operating sites under the SFSP must conduct the following monitoring visits:
  - (a) Preoperational site visit (part of application process)
  - (b) One visit within the first week of operation (This is waived for experienced SFAs whose sites did not experience operating problems in the prior year.)
  - (c) One visit during first four weeks of program operation.

The chart on **page C-133** shows the difference between the SFSP and the Seamless Summer Option.

## 2. Operating the Seamless Summer Option

The Seamless Summer Option combines features of the NSLP, the SBP, and the SFSP. SFAs participating in the Seamless Summer option basically follow the same guidelines as the NSLP and SBP.

- a. Approval Criteria: In order for an open site to be approved, at least 50 percent of the children in the area to be served must be eligible for free or reduced-price school meals. Closed enrolled sites may also qualify if 50 percent of the enrolled children are eligible for free or reduced-price meals. At these sites, reimbursement is provided for meals served to all children aged 18 and under. Camps must qualify based on individual children's eligibility and may only claim reimbursement for children who are eligible for free or reduced-price meals.
- b. Types of Sites—Schools may sponsor the following types of sites:
  - (1) Open Site—All children eat free in the community where at least 50 percent of the children are eligible for free or reduced-price meals. These sites may be operating an accredited summer school program, a 21st Century Grant Program, or the site *may just be offering the meal*. An open site may participate in the Seamless Summer Option without offering any type of educational or enrichment program.
  - (2) Restricted Open Site—This is an open site restricted for safety, control, or security and that meets the 50 percent criteria above. Educational or enrichment programs may or may not be offered along with the meal service.
  - (3) Closed Enrolled Site—This site may be in any community for an enrolled group of low-income children meeting the 50 percent criteria for an open site or using the eligibility status of individual children if 50 percent or more of the enrolled children are free and reduced-price. The SFA must explain why a closed enrolled site is being sponsored.
  - (4) Migrant Site—This site serves children of migrant families.
  - (5) Camps—A site **must be** nonresidential. A camp may qualify if 50 percent or more of the enrolled children are eligible for free or reduced-price meals and can only claim reimbursement for those children. The SFA must explain why a camp is being sponsored instead of a more conventional Seamless Summer Option site.

c. Basic Requirements for the Seamless Summer Option

- (1) Application—SFAs may apply online through the eClaims system. Log onto the SDE Web site at <www.state.sde.ok.us>, and click on *Site Index* on the left-hand side of the page. Scroll down and click on Child Nutrition eClaims. Click on the dollar sign icon, and enter your username and password. Click on the *Renewal Menu*, and scroll down and click on the Seamless Summer Application. Contact Judy Cowden-Smith at 405-522-5045 if you have questions.
- (2) Meal Pattern Requirements—SFAs follow the same menu-planning option implemented during the regular school year.
- (3) Reimbursement—Meals are reimbursed at the same NSLP/SBP/ASSP free rate as during the regular school year.

**2014 Rates for Seamless Summer Option Through June 30, 2013**

**Meal Rate**

Breakfast	\$1.58	or \$1.89 (if site is Severe Need)
Lunch/Supper	2.93	or \$2.95 (if district is a 60 percent district)
Snack	.80	

- (4) Meal Service—Open and closed enrolled sites may claim up to two types of meals per day in any combination except lunch and supper. Camps and migrant sites may serve a maximum of three meals per day and may claim both lunch and supper on the same day.
- (5) Monitoring by SFA—SFAs must review each site at least once during its operation to ensure compliance with meal counting, claiming, menu planning, and food safety requirements.

## COMPARISON OF PROGRAMS—SUMMER FOOD SERVICE PROGRAM (SFSP) VERSUS SEAMLESS SUMMER FEEDING WAIVER

<b>TOPIC</b>	<b>SFSP</b> <b>(Workshop Registration Due January/February)</b>	<b>SEAMLESS SUMMER OPTION</b> <b>(Application Due by May 15)</b>
<b>Agreement</b>	<ul style="list-style-type: none"> <li>Agreement taken with the State Department of Education</li> </ul>	<ul style="list-style-type: none"> <li>Agreement remains with the State Department of Education</li> </ul>
<b>Duration of Approval</b>	<ul style="list-style-type: none"> <li>Per state agreement and application requirements</li> </ul>	<ul style="list-style-type: none"> <li>Same as SFSP</li> </ul>
<b>Eligible Sponsors</b>	<ul style="list-style-type: none"> <li>SFAs</li> <li>Local government agencies</li> <li>Private nonprofit organizations</li> <li>Universities or colleges</li> <li>Community and faith-based organizations</li> </ul>	<ul style="list-style-type: none"> <li>SFAs</li> </ul>
<b>Type of Meals</b>	<ul style="list-style-type: none"> <li>Breakfast</li> <li>Lunch/supper</li> <li>Snack (supplement)</li> </ul>	<ul style="list-style-type: none"> <li>Same as SFSP</li> </ul>
<b>Maximum Number of Meals</b>	<ul style="list-style-type: none"> <li>Two</li> <li>Any combination except lunch and supper</li> <li>Three meals for residential camps and migrants sites</li> </ul>	<ul style="list-style-type: none"> <li>Same as SFSP, except no residential camps</li> </ul>
<b>Commodities</b>	<ul style="list-style-type: none"> <li>SFSP rate for each lunch or supper</li> <li>May receive bonus commodities</li> </ul>	<ul style="list-style-type: none"> <li>NSLP rate for lunch or supper</li> <li>May receive bonus commodities</li> </ul>
<b>Reimbursement Rates</b>	<ul style="list-style-type: none"> <li>SFSP Operating and Administrative rates apply (these are higher rates than National School Lunch Program [NSLP]/School Breakfast Program [SBP]/After-School Snack Program [ASSP])</li> </ul>	<ul style="list-style-type: none"> <li>NSLP, SBP, and ASSP rates apply (these are lower rates than SFSP)</li> </ul>
<b>Monitoring Required by School Food Authority (SFA)</b>	<ul style="list-style-type: none"> <li>Required to perform preoperational visits before a site operates the summer program</li> <li>Must visit all sites once during first week of operation (waived for experienced sponsors that are SFAs)</li> <li>Must review once during first four weeks of operation and then monitor at a <b>REASONABLE</b> level</li> </ul>	<ul style="list-style-type: none"> <li>Annual review of meal counting, claiming, and meal pattern compliance within three weeks of start of operations</li> </ul>

**COMPARISON OF PROGRAMS—SUMMER FOOD SERVICE PROGRAM (SFSP)  
VERSUS SEAMLESS SUMMER FEEDING WAIVER**

<b>TOPIC</b>	<b>SFSP (Workshop Registration Due January/February)</b>	<b>SEAMLESS SUMMER OPTION (Application Due by May 15)</b>
<b>Monitoring Required by State</b>	<ul style="list-style-type: none"> <li>Subject to review by state at least once every three years</li> </ul>	<ul style="list-style-type: none"> <li>Coordinated Review Effort (CRE) every five years</li> <li>At least one seamless site must be included in a CRE review of an SFA</li> </ul>
<b>Type of Sites and How Eligibility Is Determined</b>	<p><i>Open or Restricted-Open</i>—Based on 50 percent Free/Reduced-Price (F/RP) enrollment of the attendance area of a school or census block-group data</p> <p><i>Closed Enrolled</i>—50 percent of children enrolled in needy or nonneedy areas and are eligible for F/RP benefits</p> <p><i>Residential Camps</i>—Only meals for children who qualify for F/RP benefits are reimbursed</p>	<p><i>Open or Restricted-Open</i>—Same as SFSP</p> <p><i>Closed Enrolled</i>—Same eligibility criteria, except that must be located in nonneedy areas only</p> <p><i>Residential Camps</i>—Not eligible</p>
<b>Meal Pattern</b>	<ul style="list-style-type: none"> <li>May use the old NSLP/SBP/ASSP meal pattern requirements</li> </ul>	<ul style="list-style-type: none"> <li>Must use the new NSLP/SBP meal pattern requirements</li> </ul>
<b>Eligible Participants</b>	<ul style="list-style-type: none"> <li>Children in low-income areas 18 years or younger; a person 19 or older who meets the state definition of having a physical or mental disability</li> </ul>	<ul style="list-style-type: none"> <li>Same</li> </ul>
<b>Public Notification</b>	<ul style="list-style-type: none"> <li>SFA/sponsor is required to send public media notice regarding program and eligibility</li> </ul>	<ul style="list-style-type: none"> <li>Public media notice may be done, but is not required</li> <li>SFA must state how each site (excluding closed enrolled sites) will advertise availability of meals to the neighborhood community</li> </ul>
<b>Weekend Meals</b>	<ul style="list-style-type: none"> <li>Available with State Agency approval only</li> </ul>	<ul style="list-style-type: none"> <li>Available with State Agency approval only</li> </ul>
<b>Times of Operation</b>	<ul style="list-style-type: none"> <li>May-September for traditional school calendar areas</li> <li>October-April during unanticipated school closures (i.e., emergencies)</li> <li>During student vacations for schools on a continuous year calendar</li> </ul>	<ul style="list-style-type: none"> <li>Same as SFSP</li> </ul>
<b>Meal Service Locations</b>	<p>Schools Camps Churches Community centers Housing projects Libraries Migrant centers Parks Playgrounds Pools Other public sites where children gather</p>	<ul style="list-style-type: none"> <li>Same as SFSP</li> </ul>
<b>Meal Cost for Children</b>	<p>All meals are free</p> <p>(Although camps are only reimbursed for children who qualify for free or reduced-price meals, camp sponsors may, and usually do, provide meals free of charge to all children)</p>	<ul style="list-style-type: none"> <li>Same as SFSP</li> </ul>

## RESIDENTIAL CHILD CARE INSTITUTIONS (RCCIs) ADDITIONAL REQUIREMENTS

### ***NOTE: Boarding Schools Are Treated Exactly As a Public School***

#### A. Master Roster or Enrollment Application

Enrollment information must provide the birth date of each student to ensure that no meals served to students over the age of 21 are being claimed for reimbursement. Since all meals in this case are served at the free reimbursement rate, the RCCI may use the Meal Count Worksheet on **page C-143**.

A copy of a Master Roster can be found on **page C-137**. Both the master roster and enrollment application must contain the following information:

1. Child's name
2. Child's birth date (MM/DD/YY)
3. Date of entry
4. Child's personal income—indicate **0** if no income is received
5. Frequency with which income is received
6. Date of eligibility determination
7. Category of eligibility—see Item B below
8. Approving official's initials
9. Placement agency
10. Date of withdrawal

#### B. Statement of Facts

The simplest method of documenting a student's eligibility is to have a Statement of Facts on file at the RCCI. This is a written statement outlining the general policy or condition within the RCCI that would define all the residential students (not including day students) to be eligible for free benefits. A copy of the form can be found on **page C-139**. The following are some acceptable examples of what would qualify as a Statement of Facts.

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

*Our students are permitted to hold part-time jobs (up to 16 hours per week). The maximum earnings we have seen have been \$83 per week. We also permit students to receive up to \$5 per week from home, but we require any money received or earned to be turned into our bank and to be drawn out only with permission.*

If the RCCI does not have a Statement of Facts for its residential students that dictates the allowable income to students qualifying all of them as free or if the RCCI has day students, then it must record eligibility determination, by student, on a master roster or on an enrollment application. An application for free/reduced-price meals must be completed on each student to determine each one's eligibility. Direct Certification could also be used. (Refer to the Eligibility Section for more information.)

### C. Child Attending School Off Campus

Students residing in an RCCI but attending school off campus are not **AUTOMATICALLY** eligible at **THAT** school to receive meal benefits. The RCCI may complete the Application for Free and Reduced-Price School Meals if the adult member of the household is not available. Income for the child must be shown on the application even if it is zero. If a child resides at an RCCI but attends a school off the RCCI campus, that school **MUST** have a completed application on file for each child for whom a free or reduced-price meal is served and claimed for reimbursement.

### D. Attendance Records

If all students are residential and a general policy or condition (Statement of Facts) exists that causes all institutionalized children to be eligible for free benefits, the Master Roster is not required. However, monthly attendance records are required to be maintained by all RCCIs. Refer to **page C-141** for a copy of the form.

### E. Point of Service Meal Count

All RCCIs must take a point of service count to ensure that reimbursable meals are served. RCCIs with day students must also ensure that these counts are categorical. RCCIs with day students should refer to Section IV of the School Food Service Compliance Document for further details.

### F. Edit Check

All RCCIs are required to complete daily edit checks. Refer to **page C-145** for a copy of the RCCI Edit Check Worksheet.

### G. Financial Accounting

Each RCCI must maintain documentation of its nonprofit school food service account funds. Total revenues and expenditures must be readily available for review during a review or audit. The Year-End Expenditure/Revenue Report on **page C-147** assists RCCIs in maintaining this required documentation.



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**STATEMENT OF FACTS  
FOR  
RESIDENTIAL STUDENTS UNDER THE AGE OF 21**

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**Name of RCCI**

Explain what constitutes documentation of eligibility for free and reduced-price meals.

For the RCCI:

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

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Lunch  
 Breakfast

**RCCI MEAL COUNT WORKSHEET  
 FOR RESIDENTIAL STUDENTS WHO ALL QUALIFY FOR FREE MEALS**

Name of RCCI: \_\_\_\_\_

County/District Code: \_\_\_\_\_ Month \_\_\_\_\_ 20 \_\_\_\_\_ (To be maintained at institutions with CNP records.)

DATE	NUMBER MEALS SERVED TO RESIDENTIAL STUDENTS		
	Breakfast	Lunch	Snack
1			
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			
31			
<b>TOTALS</b>			

## **RCCI MEAL COUNT WORKSHEET**

The Meal Count Worksheet is to be used only for institutions where *ALL* students qualify for free meal benefits. An actual physical count must be taken at mealtime. The total verified meal count for each meal service is recorded after each enrolled student has received his/her meal. All meals served must meet minimum meal pattern requirements.



### RCCIEDIT CHECK WORKSHEET

1. RCCI: \_\_\_\_\_ 3. Attendance Factor (AF): **100%**
2. Month: \_\_\_\_\_ 4. Total Membership as of the First Day of the Month: \_\_\_\_\_

5. Day of Month	6. Daily Free Eligibles x AF	7. Free Meals Claimed	8. Daily Reduced-Price Eligibles x AF	9. Reduced-Price Meals Claimed	10. Daily Paid Eligibles x AF	11. Paid Meals Claimed	12. Total Meals Claimed Daily	13. (Average) Daily Attendance	14. Comments
1									
2									
3									
4									
5									
6									
7									
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30									
31									
15. Monthly Totals:									

16. Signature: \_\_\_\_\_ 17. Date: \_\_\_\_\_

**NOTE:** RCCIs with **RESIDENTIAL STUDENTS ONLY** need to complete Columns 6, 7, 13, and 14, if necessary.

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**CHILD NUTRITION PROGRAMS**

**National School Lunch Program/School Breakfast Program/After-School Snack Program**

**Year-End Expenditure/Revenue Report  
(July 1-June 30)**

Name of RCCI/Boarding School: \_\_\_\_\_

County/District Code: \_\_\_\_\_

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**1. CHILD NUTRITION EXPENDITURES (EXPENSES)**

**FOOD SERVICE ACCOUNT**

- 
- (a) Food and Milk for Students Only ..... \$ \_\_\_\_\_
  - (b) Food and Milk for Institution Employees Only ..... \$ \_\_\_\_\_
  - (c) Direct Labor and Benefits ..... \$ \_\_\_\_\_
  - (d) Other Direct ..... \$ \_\_\_\_\_
  - (e) Expendable Equipment ..... \$ \_\_\_\_\_
  - (f) Nonexpendable Equipment ..... \$ \_\_\_\_\_
  - (g) Nonreimbursable Expenses ..... \$ \_\_\_\_\_
  - (h) TOTAL EXPENDITURES ..... \$ \_\_\_\_\_
- 
- 

**2. CHILD NUTRITION INVENTORY OF PURCHASED FOOD AND MILK**

**FOOD SERVICE ACCOUNT**

- 
- (a) Beginning Inventory (Last year's ending inventory) ..... \$ \_\_\_\_\_
  - (b) Add Food and Milk Purchased ..... \$ \_\_\_\_\_
  - (c) Add or Deduct Inventory Adjustments for the Year  
(Please identify adjustments with a + or -) ..... \$ \_\_\_\_\_
  - (d) Total Food and Milk Available ..... \$ \_\_\_\_\_
  - (e) Deduct Ending Inventory as of the Last Day of the School Year ..... \$ \_\_\_\_\_
  - (f) Food and Milk Used for the Year ..... \$ \_\_\_\_\_
- 
- 

**3. REVENUE**

**FOOD SERVICE ACCOUNT**

- 
- (a) Federal Reimbursement Received ..... \$ \_\_\_\_\_
  - (b) State Match Reimbursement Received ..... \$ \_\_\_\_\_
  - (c) Income From À la Carte/Adult Meals ..... \$ \_\_\_\_\_
  - (d) Other Income ..... \$ \_\_\_\_\_
  - (e) TOTAL REVENUES ..... \$ \_\_\_\_\_
- 
-

**NATIONAL SCHOOL LUNCH PROGRAM/SCHOOL BREAKFAST PROGRAM/  
AFTER-SCHOOL SNACK PROGRAM  
YEAR-END EXPENDITURE/REVENUE REPORT  
(July 1-June 30)  
INSTRUCTIONS**

This form is to be completed using data from the National School Lunch, School Breakfast, and After-School Snack Programs for each July 1 through June 30 time period.

**NOTE:** *Figures reported should only include expenditures and revenues from the applicable National School Lunch Program, School Breakfast Program, and After-School Snack Program in which your institution participates. If your institution served more meals than this (i.e., supper), all expenditures must be prorated to only reflect Child Nutrition expenses.*

*Most residential child care institutions (RCCIs) and boarding schools serve more meals than what can be claimed for reimbursement through Child Nutrition Programs. If this is the case and Child Nutrition expenditures/invoices are not separated, the institution will need to prorate the expenses of Child Nutrition Program meals.*

- A. TOTAL NUMBER OF MEALS SERVED AT INSTITUTION FOR ONE WEEK: \_\_\_\_\_
- B. TOTAL NUMBER OF MEALS CLAIMED FOR REIMBURSEMENT BY THE INSTITUTION: \_\_\_\_\_
- C. B DIVIDED BY A = PERCENT TO PRORATE ALL EXPENSES, INVENTORY, ETC.

**Example:** The boarding school serves 28 meals per week. It serves breakfast, lunch, snack, and supper every day, seven days a week. The boarding school claims 15 meals per week for reimbursement under Child Nutrition Programs. It claims breakfasts, lunches, and snacks Monday through Friday. Therefore, the formula would look like this:

15 meals per week are claimed divided by 28 meals per week served equals 53 percent of all meals served are claimed for reimbursement. This would be the percentage the boarding school would use when completing this form. It would apply the 53 percent to the **TOTAL** food and beverage expenditures, as well as to the **TOTAL** salaries, **TOTAL** inventory, **TOTAL** equipment purchases, etc.

1. The amounts listed shall reflect the expenditures for the school year (July 1-June 30). **Do not include expenditures from special functions such as banquets or from supper meals.**
  - (a) Enter the amounts of food and milk purchased and received for student meals only for the school year. Include the Commodity Distribution Assessment Fee. Refunds from vendors shall be deducted. **Do not include expenditures for special functions or supper meals.**
  - (b) Enter the amounts of food and milk purchased and received for institution employee meals only for the school year. Include the Commodity Distribution Assessment Fee. Refunds from vendors shall be deducted. **Do not include expenditures for special functions or supper meals.**
  - (c) Enter the gross amount paid for salaries to food service workers. Include employee benefits—such as health insurance, retirement funds, and matching social security. Only include the employees' time for the preparation/service of meals claimed for reimbursement under Child Nutrition Programs.
  - (d) Enter the cost for nonfood items such as paper goods, supplies, equipment repairs (less than \$5,000 per repair), equipment rental, and extermination spent for Child Nutrition Program meals only.
  - (e) Enter the amount of each piece of equipment with an acquisition cost less than \$5,000 **purchased during the school year.**
  - (f) Enter the depreciated amount of each piece of equipment with an acquisition cost of \$5,000 or more. Prorate the amount for Child Nutrition only.
  - (g) Enter all expenditures that are not an allowable cost for reimbursement purposes (i.e., bank charge of bounced checks, lost commodities, etc.) for Child Nutrition purposes only.
  - (h) Total expenditures.
2.
  - (a) Enter the total value of the purchased food and milk for meals claimed under Child Nutrition on the first day of the school year. This amount will be the same figure as the ending inventory for the previous school year.
  - (b) Enter the dollar amount recorded in 2a above.
  - (c) Add or deduct inventory adjustments. Deduct value of food for Child Nutrition only lost, stolen, or spoiled. Add value of food misplaced and not previously inventoried for Child Nutrition only.
  - (d) Total food and milk available equals sum of (a), (b), and (c).
  - (e) Deduct ending inventory on hand the last day of the school year. This amount will be the beginning inventory for the next school year for Child Nutrition Programs only.
  - (f) Food and milk used equals (d) less (e).
3.
  - (a) Enter the amount of federal reimbursements received from the State Department of Education Child Nutrition Programs.
  - (b) Enter the amount of State Match reimbursement received from the State Department of Education Child Nutrition Programs.
  - (c) Enter the amount of revenue collected from à la carte sales/adult meals.
  - (d) Enter other revenue collected.
  - (e) Enter total revenue received.

## COMPLIANCE SECTION INDEX

Acceptable Meal-Counting System at the Point of Service .....	C-95
AccuClaim (Accurate Counting and Claiming System) .....	C-81
Acronyms .....	C-6
Administrative Sites .....	C-92
Adult Cost vs Actual Adult Charge Formula .....	C-57
Adult Meal Prices .....	C-42
Adult Students .....	C-92
After-School Basic Daily Attendance/Meal Count Record .....	C-11
After-School Content of Snacks .....	C-9
After-School Eligibility .....	C-7
After-School Meal Count Worksheet .....	C-12
After-School Menus as Served/Food Production Record .....	C-13
After-School Menus Example .....	C-15
After-School Minimum Meal Requirements .....	C-10
After-School On-Site Review .....	C-9, C-16
After-School Oversight .....	C-7
After-School Record Keeping .....	C-9
After-School Reimbursement .....	C-8
After-School Snack Program (ASSP) .....	C-7
After-School Times of Operation .....	C-8
Agreement to Furnish Food Service .....	C-105, C-106
Allowable Costs .....	C-26
Alternate Claiming Methods .....	C-83
Alternatives to Meal Service Times .....	C-91
Attendance Factor .....	C-82
Audits .....	C-35
Banquets/Catering/Adult Cafeterias .....	C-45
Carryover .....	C-28
Cash Management Improvement Act .....	C-25
Charter School Additional Two-Cent Reimbursement .....	C-18
Charter School Procedures for Child Nutrition Programs .....	C-17
Charter School Procurement .....	C-18
Charter School Record Maintenance .....	C-18
Charter School Severe Need Breakfast .....	C-18
Charter School USDA Foods .....	C-18
Civil Rights .....	C-19
Civil Rights Complaints .....	C-20
Civil Rights Compliance Checklist .....	C-21
Civil Rights Data Collection .....	C-19
Civil Rights Procedure for Filing Complaints .....	C-20
Civil Rights Program Discrimination Complaint Form .....	C-22, C-23
Civil Rights Public Information Responsibility .....	C-19

## COMPLIANCE SECTION INDEX *continued*

Civil Rights Required Staff Training .....	C-20
Claim for Reimbursement .....	C-35, C-51
Claiming Procedures .....	C-81
CNP eClaims System .....	C-36
Community Eligibility .....	C-90
Community Eligibility Provision (CEP) Calculator .....	C-109
Compliance Section Index .....	C-149
Consultant Territories .....	C-3
Contract Agreement .....	C-105
Contract Meal Prices .....	C-42
Contract Meal Service Delivery Receipt .....	C-107
Direct Costs .....	C-30
Disabled Students .....	C-118
Disciplinary Action .....	C-118
Edit Check Worksheet .....	C-97
Edit Checks .....	C-81
Edit Checks for Provision 2/3 .....	C-103
Electronic Funds Transfer .....	C-25
Equipment Depreciation for Nonexpendable Equipment .....	C-46
Expenditures .....	C-26
Expenditures vs Revenues Formula .....	C-28
Expenditures Worksheet—Food/Beverage Expenditures Only .....	C-55
Failure to Pay for Meals/Charge Policy .....	C-117
Fees for Credit Card Services .....	C-118
Financial Management .....	C-25
Fresh Fruit and Vegetable Program (FFVP) .....	C-61
Geographic Preference (FFVP) .....	C-61
Healthy and Fit Kids Committee .....	C-69
Healthy Ideas .....	C-74
Healthy School Environment (Wellness Policy) .....	C-63
Healthy School Environment Helpful Web Site Addresses .....	C-70
Income Sources for Meals .....	C-58
Indirect Costs .....	C-31
Loan Agreement for Food Service Deficits .....	C-49
Local Wellness Policy .....	C-64 - C-69
Lost, Stolen, or Misused Meal Tickets/Cards .....	C-120

## COMPLIANCE SECTION INDEX *continued*

Low-Income Student Report.....	C-38, C-53
Meal Consumption Off-Site .....	C-121
Meal Service Times .....	C-91
Mealtimes .....	C-122
Medical Statement for Children WITH Disabilities .....	C-125
Medical Statement for Children WITHOUT Disabilities .....	C-123
Milk Substitution Request .....	C-127
Milk Substitutions .....	C-119
Nondisabled Students .....	C-119
Nonexpendable Equipment Depreciation Schedule .....	C-59
Nonfederal Fund Source Formula .....	C-41
Nonfederal Fund Sources for Paid Lunches .....	C-41
Nonfood Rewards .....	C-74
Nonpricing Programs .....	C-43
Nonprofit School Food Service Account .....	C-28
Nonprogram Food Report .....	C-29, C-30
Nutrition Education and Training.....	C-63
OCAS Codes .....	C-31, C-33, C-34
OCAS Expenditure Worksheet .....	C-55
Off-Site Meal Consumption.....	C-121
Oklahoma Cost Accounting System (OCAS) .....	C-25
On-Site Review .....	C-82
On-Site Review Form .....	C-101, C-102
Out-of-Home Placement .....	C-92
Paid Lunch Equity .....	C-40, C-41
Prohibition on Advance Meal Payments in the NSLP/SBP/SMP .....	C-122
Prohibition on Separation by Gender .....	C-122
Provision 1 .....	C-83
Provision 2 .....	C-83
Provision 3 .....	C-87
RCCI Year-End Expenditure/Revenue Report .....	C-147
RCCIs Attendance Records .....	C-136
RCCIs Child Attending School Off Campus .....	C-136
RCCIs Edit Check .....	C-136
RCCIs Edit Check Worksheet .....	C-145
RCCIs Financial Accounting .....	C-136

**COMPLIANCE SECTION INDEX continued**

RCCIs Master Roster or Enrollment Application ..... C-135, C-137  
RCCIs Meal Count Worksheet ..... C-143, C-144  
RCCIs Monthly Attendance Record ..... C-141  
RCCIs Point of Service Meal Count ..... C-136  
RCCIs Statement of Facts ..... C-135, C-139  
Reduced-Price Meal Charge ..... C-43  
Refunding Unused Prepayments for Meals ..... C-117  
Reimbursement for Off-Site Meal Consumption ..... C-121  
Reimbursement Rates ..... C-4  
Reporting Dates Checklist ..... C-5  
Residential Child Care Institutions (RCCIs) Additional Requirements ..... C-135  
Revenue From Nonprogram Food Expenditures/Revenue ..... C-29  
Revenues ..... C-27  
Revenues and Expenditures ..... C-26

Schools NOT Operating Accredited Summer School Sites ..... C-129  
Schools Operating Accredited Summer School Sites ..... C-129  
Seamless Summer ..... C-131  
SFSP vs Seamless Summer ..... C-133, C-134  
Smart Snack Questions and Answers ..... C-75 - C-80  
Smart Snacks ..... C-71 - C-73  
Special Milk Program (SMP) ..... C-111  
Staffing Standards ..... C-113, C-115  
State Matching Reimbursement ..... C-43  
Student and Parent Involvement ..... C-120  
Student Issues ..... C-117  
Student Meal Prices ..... C-40  
Student Workers ..... C-120  
Substitutions to the Meal Pattern Requirements ..... C-118  
Summer Meal Availability ..... C-129  
Summer Program Rates ..... C-130

Three-Month Operating Balance ..... C-29

Unallowable Costs ..... C-27  
Use of CNP Funds ..... C-43

Virtual Students ..... C-92  
Visiting Students ..... C-93

Wellness Policy ..... C-64 - C-69