School Nutrition Program Manual

Table of Contents

This manual contains information for Schools which either participate or would like to participate in the National School Lunch Program (NSLP), and/or the School Breakfast Program (SBP), or the Special Milk Program (SMP).

All School Nutrition Programs (SNP), including NSLP, SBP, and SMP, are administered by a State Agency (SA), which in our state is the Indiana Department of Education, School and Community Nutrition Program. You are encouraged to contact the SA with your questions or for on-site technical assistance.

This manual is based on information developed by the Indiana Department of Education, School and Community Nutrition.

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

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

To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: http://www.ascr.usda.gov/complaint_filing_cust.html, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992.
Submit your completed form or letter to USDA by:
(1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410;
(2) fax: (202) 690-7442; or
(3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

Indiana Department of Education School and Community Nutrition
115 West Washington Street South Tower, Suite 600
Indianapolis, Indiana 46204-2798
(317) 232-0850
(800) 537-1142
FAX (317) 232-0855

Introduction

History

Since 1946, the National School Lunch Program has provided financial support and federally purchased commodities to help schools serve nourishing, well-balanced meals to children. The Child Nutrition Act of 1966 expanded the program to include breakfast. In 1975, the National School Lunch Act extended eligibility to residential child care institutions (RCCIs). The most current guidelines are based on the Healthy, Hunger-Free Kids Act of 2010.

Purpose

The purpose of all Child Nutrition Programs is stated as policy in the National School Lunch Act:

It is hereby declared to be the policy of Congress, as a measure of national security to safeguard the health and well-being of the Nation's children and to encourage the domestic consumption of nutritious agricultural commodities and other food, by assisting the States, through grants-in-aid and other means, in providing for the establishment, maintenance, operation, and expansion of non-profit school lunch programs.

The benefits of sponsoring School Nutrition Programs (SNP) such as the National School Lunch Program (NSLP) and School Breakfast Program (SBP) include cash reimbursement for breakfasts, lunches and snacks planned according to nutritionally adequate meal patterns and served to eligible students, as well as the provision of USDA donated food assistance (commodities) through the Food Distribution Program (FDP).

Applicable Regulations

Regulations which are pertinent to the operations of the School Nutrition Programs are 7 CFR: Part 210, Part 220, Part 245, Part 250, and Part 3015. All regulations are available on the School Nutrition page of the IDOE website.

7 CFR - Title 7 Code of Federal Regulations

7 CFR Part 210, National School Lunch Program (NSLP) - Sets forth the requirements for participation in the NSLP. It specifies program responsibilities of State and local officials in the area of program administration, preparation and service of nutritious lunches, payment of funds, use of program funds, program monitoring and reporting and recording requirements.

7 CFR Part 220, School Breakfast Program (SBP) - Sets policies and prescribes regulations necessary to carry out the provisions of Section 4 of the Child Nutrition Act of 1966, as amended, which authorizes payments to the states to assist them to initiate, maintain or expand nonprofit breakfast programs in schools and RCCIs.

7 CFR Part 245, Free and Reduced Price Eligibility – Establishes the responsibilities of State agencies, Food and Nutrition Service Regional Offices, school food authorities or local educational agencies, as defined in §245.6, as applicable in providing free and reduced price meals and free milk in the NSLP, SBP, SMP, and commodity schools.

7 CFR Part 250, Donation of Foods for Use in the United States - Sets forth the terms and conditions under which donated foods may be obtained from the USDA for use in the Child Nutrition Programs.

7 CFR Part 3015 - The uniform Federal assistance regulations published by the USDA to implement Office of Management and Budget circulars A-21, A-87, A-102, A-110, A-122 and A-128.

Common Acronyms used in the Child Nutrition Programs

ADA - Average Daily Attendance

ADP - Average Daily Participation

AR - Administrative Review

ASSP - After School Snack Program

CEP - Community Eligibility Provision

CFR - Code of Federal Regulations

CNP - Child Nutrition Programs (all nutrition programs funded via USDA)

CNPweb - Child Nutrition Programs online reporting system

DC - Direct Certification

DOE - Department of Education

FDP - Food Distribution Program

FFVP - Fresh Fruit and Vegetable Program

FNS - Food and Nutrition Service (USDA)

FSMC - Food Service Management Company

HHFKA - Healthy Hunger Free Kids Act of 2010

LEA - Local Education Agency

NSLP - National School Lunch Program

OVS - Offer versus Serve

PLE - Paid Lunch Equity

RCCI - Residential Child Care Institution

RFP - Request for Proposal

SA - State Agency (DOE)

SBP - School Breakfast Program

SCN - School and Community Nutrition (at DOE)

SFA - School Food Authority

SFSP - School Food Service Program

SMP - Special Milk Program

SNA - School Nutrition Association

SNAP - Supplemental Nutrition Assistance Program (Food Stamps)

SNP - School Nutrition Programs (Lunch, Breakfast, Snacks, Special Milk)

SSO - Seamless Summer Option

TA - Technical Assistance

TANF - Temporary Assistance for Needy Families

TN - Team Nutrition

USDA - United States Department of Agriculture

IDOE School Nutrition Webpage: https://www.doe.in.gov/nutrition

General Program Requirements

Qualifications

Schools can receive full benefits of School Nutrition Programs provided that the Local Education Agency (LEA):

1. is public or nonprofit private;
2. if private, is "tax exempt" under Section 501(c)(3) of the Internal Revenue Code of 1954;

A public LEA is one which is operated by and primarily responsible to any level of Federal, State or local government. A private, nonprofit LEA is one which is not public and is tax-exempt for federal income tax as described above.

States may not impose any additional eligibility requirements. Of course, as with schools currently participating, inability to comply with program regulations would disqualify an LEA from participation.

Agreement with the State Agency (SA)

To become a sponsor of NSLP and SBP you must request an agreement from the SA. The first year can start at any time, but there is an annual renewal process that is effective every year on July 1. The agreement, which includes sponsor and site applications, a Policy Statement, and Civil Rights information sets forth the terms, conditions, and covenants necessary to comply with government regulations of the programs. When the school administration is convinced that the responsibilities can be correctly executed, the agreement is signed by the Executive Contact and returned to the SA for consideration. It is signed at the state level, thus becoming the agreement or legal, binding contract. A copy of the signed agreement is returned to the school. It is the responsibility of the school's administrative staff to oversee the programs to assure that they are carried out successfully within the framework of the contract. It is imperative that food service employees in administrative and supervisory capacities become familiar with this document and with the Policy Statement.

 IDOE New Sponsor Webpage: https://www.doe.in.gov/nutrition/potential-school-nutrition-programs-sponsor

Policy Statements for Pricing Institutions

All schools participating in the NSLP and SBP must have a policy statement. Pricing programs (where children pay for the meals), require a lengthy policy statement as outlined in 7 CFR Part 245.10. This statement outlines the process for determining eligibility, the method payments should be collected, and the appeal process. A suggested template will be sent to new sponsors to sign prior to approval. For renewing sponsors, it is found on the CNPweb in the Sponsor Summary Packet list.

Policy Statements for Non-Pricing Institutions

Non pricing programs, such as those operated by schools implementing the Community Eligibility Provision (CEP), Provision 2, or Provision 3, may have a simplified version of the required policy statement. To qualify as a non-pricing program, schools may not charge children for any meals served.

Any policy statement for non-pricing programs must contain information that the entire enrollment is being served the same meal at no charge and without discrimination against any child in the course of the meal service. A suggested template will be sent to new sponsors to sign prior to approval. For renewing sponsors, it can be found on the CNPweb in the Sponsor Summary Packet list.

IDOE New Sponsor Webpage: https://www.doe.in.gov/nutrition/potential-school-nutrition-programs-sponsor

Food Safety

The National School Lunch Act requires that two food safety inspections per school year be conducted by the State or local governmental agency responsible for inspections. All sponsors of National School Lunch Programs should request these from their local county health department and keep documentation of the request. If a health inspection is requested and completed, the latest health inspection should be posted in a public place.

Also, all schools are required to create and implement a food safety plan. The food safety plan should include Standard Operating Procedures, Checklists for Maintaining Food Safety, and specific information that pertains to that school's program.

IDOE Food Safety Webpage: http://www.doe.in.gov/nutrition/food-safety

Wellness Policies

A local school wellness policy ("wellness policy") is a written document that guides a local educational agency's (LEA) or school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn.

All LEAs that participate in the National School Lunch and School Breakfast Programs are to meet local school wellness policy requirements consistent with the requirements. Requirements and resources may be found on the website.

IDOE Wellness Policy Webpage: http://www.doe.in.gov/nutrition/school-wellness-policy

Civil Rights

The main expectation in civil rights is treating everyone with dignity and respect and not discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

All institutions must collect and report racial and ethnic data initially when coming on the program and annually thereafter. Summer Food Service Program and Child and Adult Care Food Program must collect the number of actual participants and the estimated number of potentially eligible participants by racial or ethnic category. School Nutrition Programs must collect the actual number of children applying for free and reduced-price meals or free milk by racial/ethnic group. Sponsors must keep all data on file for three years, plus current year.

Sponsors must do the following in order to ensure compliance with civil rights procedures:

- Develop and implement a written civil rights complaint procedure to handle any discrimination complaints.
- Readily have civil rights complaint forms available to give to complainants who have a complaint.
- Have a civil rights complaint log to track any such complaints.
- Train their staff on civil rights requirements before the staff assume their duties in Child Nutrition Programs and annually thereafter. Specific subject matter must include, but not be limited to:
  - Collection and use of data,
  - Effective public notification systems,
  - Complaint procedures,

- - - o Compliance review techniques,
      o Resolution of noncompliance,
      o Requirements for reasonable accommodation of persons with disabilities,
      o Requirements for language assistance,
      o Conflict resolution, and
      o Customer service.
  - Display the current "And Justice for All" poster in a prominent place, with the exception of family daycare homes.
  - Use the USDA nondiscrimination statement on all public correspondence that implies or mentions USDA or Child Nutrition Programs.
  - Make reasonable modifications when modifications are necessary to accommodate children with disabilities.
      o An agency must reasonably modify its policies, practices, or procedures to accommodate participants with disabilities, unless the modifications would fundamentally alter the nature of its service, program, or activity. Requests for accommodations must be reviewed on a case-by-case basis to determine whether reasonable modifications can be made without fundamentally altering the program.
  - Provide equal access to the benefits of Child Nutrition Programs.

IDOE Civil Rights Webpage: http://www.doe.in.gov/nutrition/scn-civil-rights-requirement

Professional Standards

Professional Standards for school nutrition professionals is a key provision of the Healthy, Hunger- Free Kids Act of 2010 (HHFKA). This rule requires a minimum amount of annual training hours for directors, managers, and staff. The training hours for staff is dependent upon how many hours a week the employee works. Sponsors must ensure that the trainings that staff are receiving are pertaining to their specific job duties and tasks.

All sponsors should also remember that there are certain trainings that are required to be completed annually. These include civil rights and offer versus serve trainings.

There are also minimum hiring standards for new Food Service Directors hired after July 1, 2015.Hiring standards for new Food Service Directors are determined based on student enrollment per School Corporation. No hiring standards have been established for food service managers, cooks, line staff, cashiers, dishwashers, custodians, secretaries, etc. Food Service Directors hired before July 1, 2015 are grandfathered into their current position.

All Food Service Directors in the state of Indiana must be food safety certified. For new Food Service Directors, at least eight hours of food safety training must be completed within five years prior to the starting date or completed within 30 days after the starting date. Food Service Directors are required to keep an up-to-date food safety certification at all times during employment.

IDOE Professional Standards Webpage: https://www.doe.in.gov/nutrition/professional-standards

Calendars and Checklists

For all sponsors operating any of the School Nutrition Programs, there are several items to be completed during each year.

IDOE Calendars and Checklists Webpage: https://www.doe.in.gov/nutrition/calendars-and-checklists

On-Site Review

All sponsors with multiple school buildings are required to complete an on-site review for every school building before February 1. An on-site review is the evaluation of the lunch and breakfast counting and claiming procedures. Single school sites/buildings or single Residential Child Care Institutions (RCCI) sites/buildings are not required to complete on-site reviews. Sponsors that have two different sites listed in the CNPweb but serve meals in the same cafeteria are not required to conduct an on-site review. Single site sponsors are highly encouraged to conduct an annual on-site review to ensure integrity and accountability of the Child Nutrition Programs. The On-Site Review Form, Instructions, and PowerPoint are available online.

IDOE On-Site Review Webpage: http://www.doe.in.gov/nutrition/site-review

Menu Planning

Meals served in the NSLP and SBP should always be appealing, nutritious, and well-balanced to provide children with the nutrients they need according to the Recommended Dietary Allowances. They should also conform to the USDA Dietary Guidelines for Americans (https://www.cnpp.usda.gov/dietary-guidelines). As of July 1, 2012, all schools are required to operate the same food-based meal pattern under the Healthy, Hunger-Free Kids Act (HHFKA).

In order to claim reimbursement on meals served to students, the school must make sure they are following USDA's daily and weekly meal pattern requirements. Schools claiming meals for reimbursement for preschool students must follow the preschool CACFP meal pattern. These meal pattern charts list the food components and the minimum quantities required, by grade/age groups, for complete reimbursable meals.

In addition to making sure proper components are planned and served with each meal, schools must consider the calorie, saturated fat, and sodium of all meals served to students. Schools must make sure over the week, their menus align into the nutrient ranges.

Meal Requirements: National School Lunch Program (K-12)

At lunch, menu planners must plan that every meal includes the minimum portion size of these five components:

- Meat/Meat Alternate
- Vegetable
- Fruit
- Grain
- Fluid Milk

The following is a simple menu that meets all five components:

Sample Lunch Menu	Food Item	Food Component
Turkey Sandwich	Turkey	Meat/Meat Alternate
	Cheese	Meat/Meat Alternate
	Whole Wheat Bread	Grain
Tossed Salad	Romaine Lettuce and Tomatoes	Vegetable
Banana	Banana	Fruit
Milk	Milk	Milk

IDOE National School Lunch Program Webpage: https://www.doe.in.gov/nutrition/national-school-lunch-program

Meal Requirements: School Breakfast Program

At breakfast if not implementing offer versus serve, a complete breakfast consists of three food items from three components. If implementing offer versus serve (see the section below called Offer versus Serve for more details), a complete breakfast consists of four food items from three components. Located below are the three components that must be offered whether implementing offer versus serve or not:

- Grain (can add Meat/Meat Alternative and count as Grain)
- Fruit (can also serve Vegetable and count as Fruit)
- Milk

Sample Breakfast Menu	Food Item	Food Component
Sausage Biscuit Sandwich	Sausage Biscuit	Grain (Meat/Meat Alternate counting as a Grain) Grain
Apple Juice	Apple Juice	Fruit
Orange Slices	Orange Slices	Fruit
Milk	Milk	Milk

IDOE School Breakfast Program Webpage: https://www.doe.in.gov/nutrition/national-school-breakfast-program

Offer versus Serve

Offer versus serve (OvS) regulations were introduced to reduce the amount of plate waste. OvS allows children to decline a set number of components at lunch and food items at breakfast. OvS at lunch is optional for elementary and middle school (K-8) but required for high school (9-12). OvS at breakfast is optional for all grade levels. OvS is not allowed when serving reimbursable meals for preschool students.

Schools implementing OvS in their lunch program, must offer children all five components. Under OvS, all children must be given the choice to decline up to two full portions of the five components offered. However students must take at least ½ cup of fruit, vegetable, or a combination of the two for a reimbursable meal.

Schools which have OvS in their breakfast programs must offer all four food items to all children. Children then have the option to take only three items. Students must take at least ½ cup of fruit, vegetable, or a combination of the two for a reimbursable meal.

Please note the difference between breakfast and lunch with OvS. Breakfast focuses on food <u>items</u>, while lunch focuses on <u>components</u>. For instance, if a student selected at lunch a ½ cup of 100% orange juice and ½ cup of apple slices, this combination would be considered one component – Fruit. However at breakfast, if the student selected both the ½ cup of juice and the ½ cup of apple slices, even though they are both the same component, they are considered two separate food items. This makes a difference when trying to determine a reimbursable meal.

If properly implemented, OvS should reduce food waste. To ensure proper planning for OvS, schools will need to keep accurate daily records of food production for each menu item.

IDOE OvS Webpage: https://www.doe.in.gov/nutrition/offer-vs-serve-lunch and
https://www.doe.in.gov/nutrition/offer-vs-serve-breakfast

Crediting Components

Menu planners must ensure that they are serving the right portion sizes of allowable (creditable) food. USDA and Indiana has developed different resources to help menu planners know how to credit their menu items.

USDA Food Buying Guide: https://www.fns.usda.gov/tn/food-buying-guide-for-child-nutrition-programs

IDOE Crediting Webpage: https://www.doe.in.gov/nutrition/crediting

Meat/Meat Alternate

Whole muscle meat (like chicken breast) and cheese can credit ounce for ounce. Processed meat like chicken nuggets, deli ham, or beef burgers need to have either a Child Nutrition Label or a Product Formulation Statement accompanying the product to explain how it credits for the School Nutrition Program. For peanut butter, beans, yogurt, and cottage cheese use the Food Buying Guide to help determine how much to serve each grade group.

Grain

At least 50% of the grains offered to students must be whole grain-rich. Whole grain-rich means that at least 50% of the grain that makes up the product is a whole grain. Most grain crediting can be determined by referring to the Grain Equivalency Chart. Processed products that combines food components, like pizza, breaded chicken patties, macaroni and cheese, should have a Child Nutrition Label or Product Formulation Statement accompanying the product to explain how it credits.

At lunch, grain based desserts like graham crackers, cookies, cake, and brownies are limited over the week. While at breakfast, grain based desserts are not creditable.

IDOE's Grain Resources: https://www.doe.in.gov/nutrition/crediting

Fruit

Fresh, frozen, canned, dried, and 100% juice are all allowed in the School Nutrition Program. Schools will ensure they are serving the proper volume of fruit by consulting the Food Buying Guide. Dried fruit credits at twice the volume served (i.e. ¼ cup of dried apricots credits as ½ cup of fruit).

No more than half of the offerings of fruit may be in the form of juice over the week.

Fruit and Vegetable Fact Sheet for Breakfast and Lunch: https://www.doe.in.gov/nutrition/crediting

Vegetable

Fresh, frozen, canned, and 100% juice are all allowed in the School Nutrition Program. Schools will ensure they are serving the proper volume of vegetables by consulting the Food Buying Guide.

Leafy greens credit as half the volume served (i.e. ½ cup of romaine lettuce credits as ¼ cup dark green vegetable).

At lunch only, the meal pattern requires a variety of vegetables served over the week. Every week the menu planner must plan to offer Red/Orange, Dark Green, Bean/Pea (Legume), Starchy, and Other Vegetables. To determine how vegetables are categorized, view the Food Buying Guide.

Fruit and Vegetable Fact Sheet for Breakfast and Lunch: https://www.doe.in.gov/nutrition/crediting

Milk

Schools are only allowed to serve 1% or fat-free plain or flavored milk. Schools must offer at least two types of milk and plain (1% or fat-free) milk must always be offered. Possible choices include (but are not limited to):

- Fat Free Plain and Fat Free Chocolate
- 1% Plain and Fat Free Plain
- 1% Plain and 1% Chocolate

Extras

Extra Food Items

Schools are allowed to offer extra food items that don't meet the meal pattern requirements. Commonly offered extra food items include condiments like ketchup, mustard, mayo, barbeque sauce, ranch dressing, cream cheese, butter, jam, etc. While these items do not credit toward the component requirements, they are included in the calorie, saturated fat, and sodium nutrient analysis.

Additional extras could include desserts, like non-whole grain rich cookies, pudding, gelatin, etc. or side dishes, like potato chips, non-whole grain rich crackers, and cream soup. As long as the minimum daily and weekly component requirements are being met, extras are allowable. However, these extras are still counted in the weekly nutrient analysis.

A la Carte

Any additional food sold to students for seconds or a la carte must meet specific ingredient and nutrient requirements. This is explained in the Smart Snacks section of the manual.

Nutrient Analysis

As mentioned above, menus are required to meet specific nutrient requirements. Depending on the grade group that is being served, a week's menu must fall into a particular calorie range and not exceed the saturated fat and sodium limits. Additionally all food served to students must be Trans-fat free.

There is often confusion about the nutrient analysis because it is not based on one food item or one day's menu, instead the nutrient analysis is a weighted average over the week. So one day might exceed the sodium limit while the next day is well under the limit. This is okay because the menu will average out and meet the requirements. IDOE is providing free

nutrient analysis software. For more details, click here:
https://primeroedge.com/indiana/?inf_contact_key=abc5ba70ef4d5d37d18c200cc9f33c5659b30dfb135c251f00f6ff640d380c2f.

Standardized Recipes

Schools must make sure their recipes are all standardized. This is a recipe that has been tested for use in a specific kitchen to ensure that it will produce the same yield, serving size, and number of servings every time the recipe is followed as written. Standardizing recipes is the only way a school can guarantee students are getting the correct portion to meet their daily and weekly meal pattern requirements. Additionally these recipes promote consistency and quality.

Any recipe that has more than two ingredients must be standardized. This includes a peanut butter and jelly sandwich, broccoli with cheese sauce, corn with butter and salt, etc.

IDOE Standardized Recipe Webpage: https://www.doe.in.gov/nutrition/crediting

Food Production Records

Food production records are required to be completed and retained for every meal served and claimed under the NSLP and SBP. Production records provide documentation that meals claimed for reimbursement meet the quantity and component requirements. A specific format is not required, but the form should contain all of the same information as suggested on the template on the IDOE webpage.

The food production record should include the menu item, serving size, and total purchase units. Also, the food production record should show the servings planned, prepared and served including left overs. These records become a valuable planning tool, since you can use them to help estimate the amount of each menu item to prepare the next time it is served.

IDOE Food Production Records Webpage: http://www.doe.in.gov/nutrition/food-production-records

Water Availability

Schools must make potable water available to children at no charge in the place where lunch is served during the meal service. In addition, when breakfast is served in the cafeteria, schools must make potable water available and accessible without restriction to children at no charge. There are a variety of ways that schools can implement this requirement. For example, schools can offer water pitchers and cups on lunch tables, a water fountain, or a faucet that allows students to fill their own bottles or cups with drinking water. Whatever solution is chosen, the water must be available without restriction in the location where meals are served. While potable water is required to be made available to students, it is not considered part of the reimbursable meal and students are not required to take water.

IDOE Water Availability Webpage: https://www.doe.in.gov/nutrition/water-availability

Signage for Identifying a Reimbursable Meal

Schools must label, list, or otherwise identify foods or food components that are part of a meal (breakfast and lunch) near or at the beginning of the serving line and prior to the point of service.

IDOE Signage for Identifying a Reimbursable Meal Webpage: http://www.doe.in.gov/nutrition/signage-identifying-reimbursable-meal

Special Dietary Needs

Schools are required to provide reasonable modifications to students who have a medical need, disability, or impairment. A reasonable modification is a change or alteration in policies, practices, and/or procedures to accommodate a participating child's disability. Reasonable modifications to effectively accommodate children with disabilities must be made on a case-by-case basis. However, it is up to the school to determine if they will offer substitutes for students due to religious or lifestyle choices. This includes providing special meals, at no extra charge, to children with a disability when the disability restricts the child's diet.

Disability/Physical Impairment within the Meal Pattern

- If there is a medical need/disability/impairment and the meal can be accommodated within the meal pattern (Celiac Disease, single food allergy, texture modifications, etc.), SFAs are not required to obtain a medical statement signed by a health care provider with prescriptive authority and should make those necessary accommodations identified by the household.
- If a SFA would like to have a medical statement, they may ask the household to provide this documentation but cannot delay implementation of the meal accommodation. The SFA must accommodate the student as soon as possible.
- Requests for milk vary slightly.
- Disability/Physical Impairment outside the Meal Pattern
- If a student needs a substitute due to a medical need/disability/impairment outside the meal pattern (multiple food allergies, tube feedings, etc.), SFAs need a medical statement signed by a health care provider with prescriptive authority such as a physician. With this documentation, these meals are reimbursable.
- When the medical statement is required, it must include:
    - Information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet,
    - An explanation of what must be done to accommodate the child's disability, and
    - The food or foods to be omitted and recommended alternatives, in the case of a modified meal.
- An SFA cannot delay implementation until it receives the medical statement and must accommodate the student as soon as possible.
- If a medical statement is not immediately provided, the SFA must document the initial interaction with the household and should document all attempts to contact the household regarding obtaining a medical statement.
- Requests for milk vary slightly.

Religious or Lifestyle Choice

- SFAs are not required to accommodate students for religious or lifestyle choices. If a school elects to make substitutions for one student, the same accommodation should be made for all students with that religious or lifestyle choice.
- If implementing this option, the accommodation must fit within the meal pattern and no documentation is required.
- If implementing offer versus serve, students can decline certain food components/items due to religious or lifestyle choice.
- Requests for milk vary slightly.

Smart Snacks

The Healthy, Hunger-Free Kids Act of 2010 required schools operating the School Nutrition Programs to implement Smart Snacks standards beginning July 1, 2014. This rule states that all food/beverages competitively sold to students on a school's campus, during a school day are required to meet particular nutrient standards. This rule does not include the food claimed for reimbursable meals for the School Breakfast Program, National School Lunch Program, or the After School Snack Program.

These standards **do apply** to food and beverages sold to students in the cafeteria as a la carte/seconds, in school stores/snack bars, in vending machines, through culinary education programs, food given to students for "donations," or any other venues selling to students during the school day on school campus.

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

USDA defines specific terms used in the definition of what a smart snack is as the following:

- School Campus – All areas of the property under the jurisdiction of the school that are accessible to students during the school day (i.e. football fields, athletic facilities, parking lots, etc.).
- School Day – The period from midnight the day before to 30 minutes after the end of the official school day.
- Competitively Sold – Any food or beverage other than a reimbursable meal/snack

General Food Standards

These standards apply to all grade levels and only to food, not beverages. All food must meet the general standard requirements and then the specific nutrient standards.

Allowable products:

1. Whole grain-rich – grain products must include 50% or more whole grains by weight or have a whole grain as the first ingredient.
2. First ingredient is a fruit, vegetable, dairy product or protein food.
3. A combination food with at least ¼ cup of fruit and/or vegetable.

Specific Nutrient Standards

Total Fats	$\leq$ 35% calories from total fat as served
Saturated Fats	< 10% calories from saturated fat as served
Trans Fat	Zero grams of trans fat as served ($\leq$ .5 g per portion)
Sugar	$\leq$ 35% of weight from total sugar as served
Calories	Snack items and side dishes $\leq$ 200 calories per item as served, including any added accompaniments Entrée items sold a la carte $\leq$ 350 calories per item as served, including any added accompaniments

Sodium	Snack items and side dishes $\leq$ 200 mg per item as served, including any added accompaniments.
	Entrée items sold a la carte $\leq$ 480 mg per item as served, including any added accompaniments

Indiana Fundraiser Exemption

Indiana allows each school building to grant <u>two</u> fundraiser exemptions per school year. One exemption lasts one day. Any fundraiser granted the exemption must not distribute exempt food or beverages in the areas where meals are sold or eaten during breakfast or lunch meal times.

There is no set process for awarding a fundraising exemption. As long as the school can keep track of the two exempted fundraisers and provide that information during a review, it is up to the school to determine how they will award the exemptions, how they will be monitored, and the method of recordkeeping.

Beverage Standards

Grades K-8 are only allowed to purchase plain water or plain carbonated water, low-fat plain or flavored milk, fat free plain or flavored milk, 100% fruit/vegetable juice, and 100% fruit/vegetable juice diluted with water (with or without carbonation) and no added sweeteners. Portion sizes depend on the grade group that is purchasing the beverage. Review the Summary of Standards for more information.

Grades 9-12 are allowed to purchase any of the beverages mentioned for K-8, along with "no calorie" beverages, which are flavored and/or carbonated beverages with 0-10 calories (20 oz. or less) and "low calorie" beverages which are flavored and/or carbonated beverages 11-60 calories (12 oz. or less).

It is important to note that in schools where there is no way to separate the grades purchasing certain beverages (such as in vending machines or through a la carte), then the school must follow the lower grade requirements.

Record Keeping and Compliance

All non-exempt food and beverages that will be sold to students during the school day must be entered into the Alliance for a Healthier Generation Product Calculator. Schools must print off the product calculator results and keep these on file. Any food or beverage sales that receive a fundraiser exemption must be documented and kept on file.

Alliance for a Healthier Generation Product Calculator:
https://www.healthiergeneration.org/take_action/schools/snacks_and_beverages/smart_snacks/alliance_product_calculator/

Food Distribution Program

Each year, recipient agencies must first be approved to participate in the National School Lunch Program (NSLP) before they are eligible to participate in the Food Distribution Program. New recipient agencies are not eligible for USDA Foods (previously known as commodities) until they have participated in the NSLP for one school year; however they will be eligible to complete a pre- order Survey. Those Recipient Agencies who receive "vended" or catered meals are not eligible to receive USDA Foods.

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

The annual USDA Planned Assistance Level (PAL), often referred to as Entitlement, is distributed to recipient agencies though the CNPweb system to all eligible sponsors each year on an annual pre- order survey. A recipient agency's Entitlement balance is based on an RA's Total Reimbursable Lunches claimed under the NSLP for the previous school year. Each January, sponsors will be asked to complete an online, pre-order survey and spend their Entitlement up to 102% by requesting the types and amounts of USDA Foods they wish to receive beginning the following September.

Delivery of USDA Foods

Frequency of Deliveries

Each August the State contracted warehouse(s) will upload available bi-weekly delivery periods in the CNPweb system. Commodity Delivery Order requests must be completed through the CNPweb system.

Established commodity Delivery Orders to recipient agencies shall be made based on warehouse delivery periods. Those recipient agencies affected by any deviation from the published schedule shall be notified by telephone as soon as the deviation is recognized by any agent of the contractor (i.e., delivery personnel). Biweekly delivery means every other week and **not** twice a month; therefore, recipient agencies may have deliveries scheduled three times in certain months.

Delivery Times

Deliveries shall be made between the hours of 7:00 a.m. and 3:00 p.m. (Recipient Agency Local Time), unless special arrangements are made in advance. Warehouses are contracted to make deliveries during inopportune times, such as during holiday, school breaks, lunches, recess, school closures, etc. School staff must be available to accept, verify, and inspect each delivery. It is the Recipient Agency's responsibility to report school closures and such to the warehouse.

The contractor shall, where practical, provide each recipient agency with delivery on the same weekday of each scheduled delivery period or provide a 24-hour notification of delivery. This provision should actually increase delivery efficiency by enabling recipient agencies to plan and schedule receiving personnel.

In the event that deliveries are delayed due to a cause beyond the control of the recipient agency (i.e., inclement weather, contractor equipment failure, or personnel problems), the contractor shall work with the affected recipient agency to arrange another agreeable time of delivery before the next scheduled delivery date. When requested, the contractor must provide delivery to all recipient agencies. The contractor shall make every effort to ensure that deliveries are completed as scheduled on a biweekly delivery basis. Qualified, Non-school Summer Food Service Program Sponsors will have their orders placed for them by the State Agency through the CNPweb system.

Delivery Drops

Drivers and/or other representatives of the State contracted warehouse shall deliver USDA Foods into designated receiving areas at each recipient agency site and shall not be required to stow such USDA Foods on shelves. Due to the delivery driver's tight schedule, it is the responsibility of the Recipient Agency to have school staff available to receive the deliveries. This applies during inconvenient times such as lunch, recess, etc.

Single Inventory Record Keeping System

Indiana, like many other states, has adopted the single inventory approach to receiving, storage and utilization of USDA Foods. Once a USDA Food item appears in a sponsor's CNPweb inventory, it is considered to be commercial product regarding delivery, receiving, storage and utilization. The single inventory recordkeeping system combines purchased

food and USDA Foods purchased for the School Nutrition Programs into one system. USDA's decision to purchase and distribute USDA Foods in commercial labels rather than USDA labels created a need to change inventory procedures. Since USDA Foods would be visually indistinguishable from purchased food, maintaining separate inventories for the two classes in order to facilitate compliance with existing regulations would be difficult. Therefore, USDA granted states a waiver from certain regulatory requirements. States that adopted the single inventory system, and SFAs under their oversight, were instructed to apply the same recordkeeping and inventory requirements to USDA Foods that they use to safeguard foods purchased with School Nutrition Program funds.

Handling USDA Foods under the Single Inventory Record Keeping System

1. The value of the USDA Food will be realized when title passes to the recipient agency. At that point, the product becomes the property of the recipient agency and is a nonprofit food service account asset.
2. Since separate inventories are no longer required, the same inventory valuation method currently used by the recipient agency for purchased products would now apply to all USDA Foods. For example, if the recipient agency uses FIFO (first in-first out) for purchased products, the recipient agency would use FIFO for its USDA Foods.
3. The recipient agency will treat and safeguard its USDA Foods just as it now does with supplies purchased with nonprofit food service account funds. As always, good inventory management and control practices must be maintained.
4. The recipient agency may use the USDA Foods across programs as long as all income accrues to the nonprofit food service account in the same manner income currently accrues from the use of supplies purchased with nonprofit food service account funds.
5. When a loss of a USDA Food occurs after title has transferred, the recipient agency is required to use the same procedures currently in place for reporting purchased product losses. If the recipient agency is not obligated to report purchased product losses to the State agency, the recipient agency will no longer be responsible for reporting USDA Food losses. However, the recipient agency remains responsible for ensuring that all nonprofit food service resources are safeguarded and reminded that any misuse of nonprofit food service resources is subject to criminal prosecution under section 12(g) of the National School Lunch Act.
6. USDA Food entitlement credit will be available to recipient agencies that furnish food for nationally declared disaster feeding. The credit cannot exceed the lesser of the actual USDA Foods supplied or the amount of the USDA Foods received during the past 12 months.
7. Once received by the recipient agency, the State agency will not be involved in arranging or accounting for transfers to other agencies. Transferring of USDA Foods may still occur, however, arrangements will be made at a local level. Since the value of the USDA Food has already been realized by the recipient agency, no additional entitlement will be credited. It will be the responsibility of each recipient agency to recoup the transferred product value.
8. Food safety recalls will follow the current USDA Hold and Recall procedures. As with any commercial product, can codes and establishment numbers will be used.

Receiving

1. Designated receiving areas have the following parameters:
2. Delivering carriers shall have access to a ground level unloading area or standard truck dock.
3. Facilities shall be accessible by truck.
4. Final receiving areas shall be on the same level as the unloading area and no more than fifty feet from ground level unloading area or truck dock.
5. Carriers will follow standard industry practice pertaining to deliveries when addressing unusual delivery situations. A recipient agency representative shall verify accuracy of items, quantities, and condition of USDA Foods. The recipient agency representative must sign each delivery receipt. The receiving agent shall note variances from the norm, such as shortages, damages, etc., on the appropriate delivery receipt. Delivery personnel shall initial all such notations.
6. A recipient agency delivery order of fewer than ten cases per drop site will be assessed a drop fee not to exceed fifteen dollars per drop. A drop fee may not be assessed when delivery of less than the minimum is the result of

the contractor's discretion. As an example, if a single recipient agency requested a combined delivery of dry and cooler/freezer USDA Foods which met the minimum delivery requirement and the contractor decided to deliver less than the minimum of dry USDA Foods on one day and less than the minimum of cooler/freezer USDA Foods several days later, the recipient agency would not be subject to the drop fee.

Damages and Shortages

The sponsor should approach these issues for USDA Foods just as they would for any commercially purchased product. Under the single inventory system, your first contact would be the distributor. Be sure that all such incidents are noted on the delivery document and initialed by the delivery agent. The distributor will post a USDA Food short delivery in the CNPweb system and the sponsor will need to reorder the product.

USDA Food Complaints

When a sponsor can clearly identify that there is a problem with a USDA Food product they may contact the State Agency to determine if a formal complaint to the USDA is warranted.

IDOE Food Distribution Program Webpage: https://www.doe.in.gov/nutrition/usda-foods-distribution-program

Procurement

The requirements as set forth in USDA regulations for each program are similar in scope. The program regulations that outline the basic requirements for procurement are: 7 CFR Part 210.16(b) & (c); 7 CFR Part 210.21. Federal regulations require schools receiving Federal School Nutrition funds to follow certain rules for procurement. The regulations can be found in 2 CFR Part 200 (specifically 200.318 – 200.326).

State agencies and school food authorities shall comply with the requirements of this part and 2 CFR Part 200, subpart D and USDA implementing regulations 2 CFR part 400 and part 415, as applicable, which implement the applicable requirements, concerning the procurement of all goods and services with nonprofit school food service account funds.

These standards do not relieve the grantee of any contractual responsibilities under its contracts. Grantees shall use their own procurement procedures which reflect state and local laws as they conform to USDA regulations.

"Grantees shall maintain a written code or standards of conduct which shall govern the performance of their officers, employees, or agents engaged in the award and administration of contracts supported by federal funds."

No one affiliated with the grantee (i.e. employee, officer, or agent) can take part in the selection or award of a contract supported by federal funds. **(A potential contractor cannot prepare and/or develop any procurement or contract documents).**

"The grantee shall establish procurement procedures which provide that proposed procurement shall be reviewed by grantee officials to avoid the purchase of unnecessary or duplicate items".

2 CFR Part 200 stresses anticompetitive practices as implemented in Public Law 105-336. A potential contractor may provide specific information. However, a potential contractor cannot prepare procurement or contract documents (specifications, invitation to bid, statement of work, RFP, etc.).

The grantee shall in its evaluation consider alternatives to ensure an economical purchase is made. Alternatives are, but

not limited to; 1) breakout of different items so as not to limit competition; 2) or consolidate to achieve a more equitable price and /or fee; 3) and consider lease instead of purchase.

"All procurement transactions regardless of whether by sealed bids or by negotiations, and without regard to dollar value, shall be conducted in a manner that provides maximum open and fair competition consistent with regulations. Procurement procedures shall not restrict or eliminate competition."

Awarding of a contract should only go to the contractor who can successfully carryout the terms and conditions of the proposal. Consideration should be given to integrity, past performance, and financial stability.

Types of Procurement

The non-Federal entity must use one of the following methods of procurement:

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold of $10,000. To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold ($150,000 for Indiana). If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

Procurement by sealed bids (formal advertising) are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price.

USDA Regulations and Other Resources

- **7 CFR 210: (210.16 and 210.21)** http://www.gpo.gov/fdsys/pkg/CFR-1998-title7-vol1/content- detail.html
- **7 CFR 250: (250.12 and 250.30)** http://www.gpo.gov/fdsys/pkg/CFR-2007-title7-vol1/content- detail.html
- **IDOE/SCNP:** http://www.doe.in.gov/nutrition/scn-procurement
- **Institute of Child Nutrition:** Procurement in the 21st Century: https://www.doe.in.gov/sites/default/files/nutrition/procurement-21st-century.pdf

IDOE Procurement Webpage: https://www.doe.in.gov/nutrition/nslp-procurement-page

Free and Reduced Price Eligibility

Once a school has been approved to operate the NSLP/SBP, it is necessary to establish the eligibility of the children participating at the school.

A student's eligibility for free, reduced or paid meal benefits is determined based on the student's household size and income, Food Stamp/TANF participation, or Foster, Runaway, Homeless, or Migrant status.

Direct Certification

Direct Certification is an important process that schools must complete a minimum of three times per program year. The state recommends schools conduct Direct Certification monthly. This will ensure that the school is capturing the highest eligibility.

Direct Certification matches SNAP (Food Stamp), TANF, Medicaid, and Foster information with a school's roster. Schools can manually upload their roster, or the system will pull the latest Real Time Report (for public schools) or Enrollment and Mobility Report (for private schools) and use that information to Direct Certify students.

Students that are identified in the Direct Certification database are automatically considered Free (if identified because of SNAP, TANF, Medicaid Free, or Foster) or Reduced (if identified because of Medicaid Reduced). Furthermore, if a student is found on Direct Certification because of SNAP (Food Stamps), TANF, or Medicaid Free/Reduced, anyone else in the student's household will automatically qualify for free or reduced meals due to that one student's Direct Certification status. Schools should not distribute or process applications from households that have been Direct Certified because of Food Stamps, TANF, or Medicaid.

If a student is found in Direct Certification because they are a foster child, then the benefit only applies to that child. Households that only have foster students identified through Direct Certification are not required to submit an application. However, if a household is made up of foster children (identified through Direct Certification) and non-foster children, the household can submit an application with the foster children and non-foster children to determine if the non-foster children qualify for free or reduced meals.

Direct Certification takes place in the STN Application Center: https://scndcdv.doe.in.gov. All users must have a log in and password. This log in and password is assigned by the STN Administrator at the school level. The STN Administrator will need to assign access for Direct Certification and Verification.

A Direct Certification match list will include the name of the student, their address, birthdate, guardian or parent information, case number, and categorization – whether approved because of SNAP, TANF, Medicaid, or Foster status. Schools will need to go through the list to ensure all of these students have been approved for free or reduced meals. They will also need to ensure that any other student who lives with the one who qualified because of SNAP, TANF, or Medicaid also qualifies for free or reduced benefits. The school will need to keep track of these counts for future reporting.

Free Direct Certification benefits can only be applied beginning the date the student or household was found on a Direct Certification Match or through a Direct Certification Look Up. Schools are only allowed to apply Direct Certification benefits earlier then the date identified in the STN Application Center if they have an approved DC Effective Date Eligibility Waiver on file with the State.

Schools should maintain all Direct Certification Downloads on file for 3 years plus the current operating year.

Direct Certification Look Up

The STN Application Center also has a look-up feature for Direct Certification. Schools that are told a household is eligible for these free meals or receive applications with a Food Stamp or TANF case number or a checked Foster box should look up the household in the database. If a match can be made, the school should print off the look-up documentation and keep on file with the other Direct Certification documentation.

IDOE Direct Certification Fact Sheet: https://www.doe.in.gov/nutrition/free-and-reduced-fact-sheets-and-training

Direct Certification Frequently Asked Questions sheet: https://www.doe.in.gov/nutrition/snp-free-and-reduced-

Free and Reduced Application Process

Schools not implementing a special Provision are required to distribute and process Free and Reduced Applications to determine student eligibility. Before applications are distributed, the school must conduct Direct Certification. This will help cut down on the total number of applications that need to be processed. Households should be able to submit an application at any point during the school year.

Every year the state posts an updated Free and Reduced Application on the School Nutrition Program Website. Along with an updated Free and Reduced Application, schools will also find a parent letter/instructions template, notification letters, and Spanish language resources. Schools that use online or computer-based applications, must make sure the questions and language matches with the updated paper applications.

Schools have 10 operating days to process an application once it has been submitted. However applications should be processed as soon as possible. Applications can be approved based on Food Stamp/TANF benefits; Foster, Homeless, Migrant, or Runaway designation; or income eligibility.

A Complete Food Stamp/TANF Application Will Include:

- Names of all of the students in the household, along with name of school building, birthdate, grade, and a checked box indicating if the student is living with parent or caretaker relative
- A case number that meets Indiana's case number format – 10 digits beginning with a 10
- A signature of the adult completing the form and the day's date

If the application is missing any of these items, the application cannot be approved until these are completed. If the case number is not Indiana's format, contact the household to find out what this number is. If it is from another state, contact the State Agency to determine what that state's case number format is. If the number is an EBT card number, the household will need to provide their actual case number. If the number is a Medicaid number, try looking it up in the STN Application Center. If the case number can be found, the student (and anyone the student lives with) will be approved for benefits through Direct Certification. If the number cannot be found in DC, then you cannot accept the application. The household would need to provide income information or a SNAP or TANF case number on their application. If the number is a Hoosier Healthwise number, explain to the household that only SNAP or TANF automatically qualifies students for free meals on an application and they can provide their income information or a SNAP or TANF case number.

If the application looks correct, the school should then conduct a Direct Certification Look Up to see if they can be identified in the STN Application Center. If they can, then the household will be considered Direct Certified and the application can be disregarded. If they cannot find the household in the DC Database, then the application can be approved based on face value. It will be considered a Categorical Application, which means it can potentially be pulled for Verification.

A Complete Foster, Homeless, Migrant, or Runaway Application Will Include:

- Names of all of the students in the household, along with name of school building, birthdate, grade, a checked box indicating if the student is living with parent or caretaker relative, and the Foster or Homeless, Migrant, Runaway box checked
- A signature of the adult completing the form and the day's date

If the school receives an application with the Foster box checked, the school should conduct a Direct Certification look-up to see if they can be identified in the STN Application Center. If the student is found, the student will be considered Direct Certified. If the student is not found, the school should contact the household to determine if this is really a foster

situation. If the household says that this is a foster situation, the school can approve the application based on face value. It will be considered a Categorical Application. If the household does not indicate that this is a foster situation, you can ask for paperwork from the court or child agency that indicates this is a foster situation. If they provide the paperwork and it is determined that the student is foster, the student will now be considered Direct Certified. If the household cannot provide documentation indicating this is a foster situation, they need to provide income information in order to determine if the student is eligible for free or reduced meals.

If the school receives an application with the Homeless, Migrant, or Runaway box checked, the approver should check with the school's homeless or migrant liaison. The liaison can provide validation that the student is considered one of these categories. All that needs to be on file is a letter from the liaison with the date the student was determined homeless or migrant, the name of the student, and the signature of the liaison. This can be attached to the application or it can be submitted in lieu of an application. The student would then be considered Direct Certified. If the liaison determines this is not a homeless, migrant, or runaway situation, the household needs to submit an application with income information to be eligible for free or reduced meals.

A Complete Income Eligible Application Will Include:

- Names of all of the students and children in the household, along with name of school building, birthdate, grade, and a checked box indicating if the student is living with parent or caretaker relative
- Names of all other household members, including any income that is received with the income frequency checked.
- Total number of household members and the last four digits of the Social Security Number listed or the No SSN box checked.
- A signature of the adult completing the form and the day's date

If the school receives an income application, they must first determine how many household members are in the house. Then they will need to figure out the income eligibility. If one pay frequency is listed (for instance all the income reported is monthly), the school will need to refer to that particular frequency column on the Income Guidelines. If multiple pay frequencies are reported, the school will need to convert the income to an annual frequency and then look at the annual column on the Income Guidelines. The annual conversion should only be completed by the following methods:

- Weekly - multiply by 52
- Every two weeks – multiply by 26
- Twice a month – multiply by 24
- Monthly – multiply by 12

A Complete "No Income" Application Will Include:

- Names of all of the students and children in the household, along with name of school building, birthdate, grade, and a checked box indicating if the student is living with parent or caretaker relative
- Names of all other household members
- Total number of household members and the last four digits of the Social Security Number listed or the No SSN box checked.
- A signature of the adult completing the form and the day's date

No Income applications can be approved based on face value. The family can begin receiving free benefits once the application has been processed. Schools are highly encouraged to verify No Income applications for cause. See Verification for Cause for more information.

Notification of Eligibility

Once an application has been processed, households must be notified of their eligibility status. Households that are approved for free or reduced benefits may be notified either in writing (email or letter) or verbally. Households that have been denied benefits must be notified in writing.

The eligibility is in effect for the current school year beginning the date the application is approved* and up to 30 operating days into the subsequent school year. If no new application is submitted or children are not direct certified in the subsequent school year, children will continue to receive the previous year's benefits for 30 operating days. On the 31st operating day, the children's eligibility will change to paid. For more information, check out Indiana's School Nutrition Division's Carry-Over Fact Sheet, available here: https://www.doe.in.gov/nutrition/free-and-reduced-fact-sheets-and-training.

If it was determined that the initial eligibility determination was found to be incorrect during a second review or Administrative review, schools must make appropriate changes to the household's eligibility. When verification of the household's eligibility does not support the level of approved benefits, the school must also make appropriate changes to the household's eligibility. If the household requests a reduction in eligibility, schools must also make the appropriate changes – for instance if the household was Direct Certified, but wants to decline the benefits, the school must change the household to Paid status.

All processed applications (whether approved or denied) must stay on file for 3 years, plus the current operating year.

*Schools may apply for an Effective Date Waiver. This waiver allows schools to begin claiming reimbursement on approved applications beginning the date the application was submitted to the school, instead of the date the application was approved. For more information about the Effective Date Waiver, contact your Field Consultant.

IDOE Free and Reduced Webpage: https://www.doe.in.gov/nutrition/snp-free-and-reduced-information

Verification

Verification is the process that confirms a household's eligibility status. When a household submits a Free and Reduced Application, they sign the application indicating they are aware their information could be verified at any time.

All schools that process Free and Reduced Applications must conduct Verification every year. This process begins October 1st and must be completed by November 15th.

To determine the amount of applications that are required to be verified, the school must count all approved Free and Reduced Applications on file on October 1st. Any household that has withdrawn before October 1st, does not need to be included in this count. Direct Certified students (whether Direct Certified through a match list or through Look-Up) should not be included in this count, as well.

Once the school has the total number of applications on file on October 1st, they must then figure out their sample size that they need to pull. This is determined by the type of Verification Method the school needs to use.

Standard (Error Prone)

Schools are required to conduct Standard (Error Prone) verification if their non-response rate the previous school year was 20% or higher. For example, if a school was required to verify 10 applications the year before and 3 of the households contacted never replied to verification requests, the school would have a 30% non-response rate. This school would be required to conduct Standard (Error Prone) verification the following year.

Steps for Starting Standard (Error Prone) Verification

1. After counting the total number of free and reduced applications on file on October 1st, determine what 3% of the applications would be. For example, if the school had 150 approved applications on file, 3% would be 4.5. The school must round up and so their verification sample size would need to be 5.
2. Applications should be separated into two stacks – "Error Prone" and "Non-Error Prone." Error Prone applications are those that were so close to the income guidelines, they almost were not approved. Specifically within $1,200 annually ($100 monthly) of the free or reduced cut off.
3. The school will pull their verification sample size from the stack of Error Prone applications.
4. If there are not enough Error Prone applications on file to fill the verification sample size, the school can randomly select the rest of the applications from their main stack.

Alternate 1 (Random) Verification

If schools are not required to conduct Standard (Error Prone) verification, they can choose the verification method they want to complete. The most popular option is Alternate 1 (Random) verification.

Steps for Starting Alternate 1 (Random) Verification

1. After counting the total number of free and reduced applications on file on October 1st, determine what 3% of the applications would be. For example, if the school had 150 approved applications on file, 3% would be 4.5. The school must round up and so their verification sample size would need to be 5.
2. The school will pull this sample size from their entire stack of approved Free and Reduced applications on file as of October 1st.

Alternate 2 (Focused) Verification

Another verification option for schools is Alternate 2 (Focused). This pulls applications from the stack of Error Prone applications on file on October 1st and the stack of categorical applications on file (those approved for Free eligibility due to a Food Stamp or TANF case number recorded on the application).

Steps for Starting Alternate 2 (Focused) Verification

1. Schools will calculate 1% of all approved applications on file on October 1st. For instance, if the school had 150 applications on file, 1% would be 1.5. The school must round up to 2, so that means their sample size they need to pull is 2.
2. The school will then select that number of applications from the stack of "Error Prone" applications on file.
3. In addition to 1% of Error Prone applications, the school must also calculate .5% of the total number of categorical applications on file. If the school had 15 Food Stamp/TANF applications on file on October 1st, they would determine that .5% of 15 is .075. The school must round up and randomly select 1 application from the stack of Food Stamp/TANF applications.

Completing Verification

Once the school has determined the method of verification, they must complete and have pulled the appropriate number of applications. The school must conduct a confirmation review. This means someone who did not process the application will review the application to make sure it was correctly approved in the first place.

Once it is determined that the application was processed correctly, the school can then check the application in the STN Database under Direct Verification (see below for more information on this process).

If the application could not be Direct Verified, the school will send a notification letter to the household that applied.

This letter will indicate the amount of time the household has to respond and provide verification documentation.

The school must follow up with the household if they don't hear from the family after a certain length of time. This 2nd notification can be made in writing (mail, email, text) or verbally. The school must document when this 2nd notification was made.

If the household responds, the school will process the documentation to make sure the household really does qualify for the benefits they were originally approved for. If the household proves their eligibility, then a letter must be sent home indicating their benefits will remain as they are. If the household provides documentation that does not support their application, they must be notified and their benefits will change from their current eligibility to paid in 10 calendar days. If the household does not respond, their benefits will change from their current status to paid. A notification letter will be sent indicating their benefits will change in 10 calendar days.

Schools must report their verification results on the back of the application pulled for verification. They must also keep the verification documentation with a copy of the verified application on file for 3 years plus the current operating year.

Direct Verification

Direct Verification is the voluntary process of checking the applications pulled for Verification through the STN Application center – this is the same database where schools conduct Direct Certification.

Between September and December, schools can look up the names on their free and reduced applications pulled for verification in Verification Look-Up.

This system will notify the school if the household can automatically be verified for their current benefits without contacting the household. In addition to Food Stamps, TANF and Foster information, Direct Verification is pulling income information from the Medicaid database. While Medicaid does not automatically qualify a household for free meals, it can verify if a household really should be getting free or reduced benefits based on their income reported to Medicaid.

Direct Verification should take place before a household is notified about Verification. If the school can verify one individual on the application in the Direct Verification Look-Up, they do not need to contact the family. Verification is considered complete once the Direct Verification Look-Up page is printed and attached to a copy of the application pulled for Verification. The back of the application needs to be completed as well.

If the household could not be verified through Direct Verification, then the school must send a notification letter indicating the household has been pulled for verification and must provide documentation to support the application.

Verification Summary Report

The Verification Summary Report becomes accessible once the October claim for reimbursement has been filed. This report must be completed by December 15th of every year. The school will be recording the total number of students Direct Certified as of October 31st, the total number of applications on file as of October 1st, and the total number of students on those applications on October 31st. They will then report their verification results.

Instructions for this report vary depending if the school operates Community Eligibility Provision, Provision 2/3, is an RCCI, or operates normally.

Verification for Cause

Verification for Cause may be conducted at any point during the school year. Verification for Cause can only be conducted on applications that are approved for free or reduced meals. Once the application is approved, if the school has suspicions of the household's actual eligibility, they may conduct Verification for Cause.

Suspicious Applications

- New applications from households that were non-responders during verification the previous year
- Error prone applications
- Zero income applications
- School district employees' applications that seem to be inconsistent

Verification for Cause Process

1. A notification letter must be sent to the household indicating that they need to provide documentation to support their application.
2. The household must be given enough time to respond and the school must follow up once, if the household hasn't responded in a timely manner.
3. If the household responds, the school will process the documentation to make sure the household really does qualify for the benefits they were originally approved for. If the household proves their eligibility, then a letter must be sent home indicating their benefits will remain as they are. If the household provides documentation that does not support their application, they must be notified and their benefits will change from their current eligibility to paid in 10 calendar days.
4. If the household does not respond, their benefits will change from their current status to paid. A notification letter will be sent indicating their benefits will change in 10 calendar days.

Schools must record the verification results on the back of the application that was pulled for verification.

The applications verified for cause should not be counted towards your sample size of applications you must pull for verification. This is supposed to be a separate process. Any applications verified for cause up until November 15th will be reported in two sections of the Verification Summary Report.

Schools must keep on file the applications they pulled for verification and the documentation that the household provided for 3 years plus the current operating year.

IDOE Verification Webpage: https://www.doe.in.gov/nutrition/snp-verification

Disclosure

The information provided by families on the Free and Reduced Price Application can be used only for determining eligibility for meal or milk benefits and verification of eligibility. Schools that plan to disclose children's eligibility status for purposes other than determining and verifying free or reduced price eligibility must inform households of this potential disclosure. In some cases the school must obtain consent of a parent or guardian prior to the disclosure. The disclosure requirements also apply to information obtained through direct certification.

Disclosure is always an option, not a requirement. The school food service director and any school staff responsible for determining eligibility are the ones who decide whether or not children's information will be disclosed. Determining officials must consult USDA's Disclosure Chart on pages 86 and 87 of the Eligibility Guidance Manual (https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf) and Indiana's Disclosure Chart (https://www.doe.in.gov/nutrition/disclosure-and-appeal-free-and-reduced-price-information) to determine if parental/guardian consent is required for disclosure.

If no prior permission is necessary, the determining officials must still notify the household of the disclosure and enter into a memorandum of understanding or other agreement with all involved parties. If parent/guardian permission is required, a letter must be sent home that specifically outlines the disclosure request. The determining official must also develop a memorandum of understanding or other agreement with the individual or group that wants this information.

Parent/guardian consent forms cannot extend from one school year to the next .Consent must be obtained each school year. Each disclosure requires must be individually listed for the parent/guardian to opt in. Only the individual or group that has signed the disclosure agreement may have access to application information from the households that have provided consent. Although a program or person may be authorized to receive free and reduced price eligibility information, there must be a legitimate "need to know" to provide a service or carry out an authorized activity. Eligibility information cannot be made available to all school officials as a general practice. Teachers, guidance counselors, principals, etc. who are not providing such assistance under the appropriate statutory or regulatory requirements cannot have access.

IDOE Disclosure Webpage: https://www.doe.in.gov/nutrition/disclosure-and-appeal-free-and-reduced-price-information

Financial Management

Recordkeeping

There are financial recordkeeping requirements for the NSLP and SBP. Sponsors should either establish a separate account for the nonprofit food service or maintain a separate line item fund in order to track expenditures and revenue related to child nutrition programs. This information must be available for review by the state agency at any time. It is required that schools complete a food service Annual Financial Report in our online CNPweb system. This form is available at the end of claims list each year and must be completed by September 1st. Instructions for its completion are in Resources on the CNPweb.

Records should demonstrate compliance with program requirements and should include revenue and expenditure records sufficient to establish the nonprofit status of the food service operations. All records, including supporting documents such as bills and invoices, must be retained for a minimum of three years plus the current operating year after the end of each program year, June- July.

Schools may use a bookkeeping system of their choice. The following section specifies the types of financial records that must be retained. Not every school will have all types of assets and expenses.

Cash and Cash-Like Records	Examples of Minimum Records
Savings and/or checking account	Bank statements
Cash-on-hand	Cash count record and petty cash account
Cash due the program	Federal Reimbursement due, charged lunches, discounts earned
Negotiable securities	Market value of T-bills, bonds and stocks owned by the nonprofit foodservice
Cash payable (a debit item)	A bill that is on hand to cover a legitimate nonprofit foodservice expense

Expenses	Examples of Minimum Records
Net purchases*	Food purchases, less discounts and returns
Commodity charges	State processing, handling and delivery charges
Labor	Payroll records, including employee/employer contributions to FICA, etc.

Other Expenses	The nonprofit food service may pay these costs. Supporting bills must be retained. Examples are trash, utilities, insurance, paper, cleaning supplies, repairs, equipment, and depreciation. **

***Food Costs**: At the end of any program year, the nonprofit food service will need to know an average food cost per meal in order to allocate expenses on the AFR appropriately. The AFR instructions in the CNPweb system give complete guidance on this process.

**Depreciation of Equipment: This is defined as depreciation of nonexpendable food service equipment costing more than $300 and having a useful life of more than one year. If equipment is depreciated, it should be depreciated over a twelve year period. Equipment costing under $300 per unit may be expensed when purchased.

The following **non-financial** records must also be kept:

1. **Meal Counts** - Schools must keep a record of each site's daily meal count by meal and by category to support its Claim for Reimbursement.
2. **Free and Reduced Price Meal Data** - Schools must maintain an accurate record of the number of children eligible for free and reduced price meals, including any source documentation. This can be accomplished by maintaining your eligibility roster and any free and reduced price application files. Active applications should be divided into free and reduced categories, and should indicate the dates of any eligibility changes for children who have withdrawn from the site, or had reported a change in income or family size.
3. **Production Records and Menus** - Menus and production records must be maintained to demonstrate that the required number of food components and food items are offered on any given day. Production records should include sufficient information to evaluate the menu's contribution to the meal pattern.

Specific Prohibitions

1. Meals for both program and non-program adults may **not** be claimed for reimbursement. However, food service revenues may be used to pay for, or subsidize, meals for program adults.* Non-program adults, however, are not to be supported by food service revenue. If you wish to charge non-program adults less than it costs to produce the meal, revenue must be transferred to the food service account from another source.
   a. *Note: A program adult is an individual whose job description includes some on-site responsibility for food service, i.e. SBP and NSLP. A non-program adult is an individual whose responsibilities do not include food service programs.
2. Revenues may not be used to purchase land or buildings or to construct buildings.
3. The school must limit its net cash resources to an amount that does not exceed three months' average expenditures for its nonprofit food service or such other amount as may be approved by the SA in accordance with 7 CFR Part 210.19(a).

Reimbursement

Reimbursement rates are adjusted annually in mid-July and vary for each program (NSLP and SBP). For the NSLP and SBP, there are three reimbursement rates: free, reduced priced and paid. The rates are posted on the Pricing Guidance Webpage.

Schools are eligible for an additional 2 cents per lunch reimbursement if 60% or more of lunches in the second preceding year were served to children eligible for free and/or reduced price meals. This will be noted in the

Sponsor Information Sheet in the year the school becomes eligible.

The Severe Need Breakfast rates allow qualified sites to receive additional per breakfast reimbursement. Sites are designated in the Site Sheet Breakfast Program section as "severe need" if 40% or more of its lunches from the second preceding school year were served to children eligible for free or reduced price meals. This must be met on a site-by-site basis and is automatically figured from the online claims. If the same sponsor is operating more than one school, eligibility is determined for each school site separately.

If a school was not participating in the NSLP two years ago, that school is not eligible to qualify for Severe Needs Rates. After the school has participated in the NSLP for the two year period and has necessary participation data, it would then be eligible to qualify for the higher reimbursement rate. This will be automatically determined in the CNPweb system each year.

IDOE Pricing Guidance Webpage: https://www.doe.in.gov/nutrition/snp-pricing-guidance

Meal Counting and Claiming Systems

In order to obtain federal reimbursement for meals served, trained adults must accurately count, record and claim the number of meals actually served to eligible participants.

Schools must have a Policy Statement approved by the SA before any meal count system is implemented. (Please refer to the Policy Statement section for specific requirements.) Also, all food service personnel must be adequately trained before starting any child nutrition program.

The essential components of a good counting and claiming system are the point of service meal count and the recording and reporting procedures.

Any System In Place Must Provide A "Point of Service" Meal Count:

- of reimbursable meals served;
- by type (free, reduced price and paid);
- each day; and
- without overtly identifying students receiving meal benefits.

There are different ways to count meals served by category, but the most common tool used in schools is a Point of Sale Software System or check-off list.

Point of Sale Software System

It is up to the individual school to determine which point of sale software system will be right for their needs. Schools need to make sure that they are not overtly identifying students by having the screen with the student's name and status available for anyone to see during the food service operation. As each child is served a meal, his/her name is checked off in the system.

Software systems must be kept up-to-date and must accurately reflect the correct eligibility category of students. The names of children who have withdrawn from the institution should be removed with the date of withdrawal. Newly enrolled students must be added and the date noted. The software system must be able to include the date and the type of meal being counted and maintained as documentation of numbers claimed for that meal on that date.

Check-Off List

Check-off lists indicate the names of all eligible students, by category, and are used at the point of service to record the number of reimbursable meals served. As each child is served a meal, his/her name is checked off on the list. At the end of the service, check marks are added up, by category, to determine the daily meal count.

Check-off lists must be kept up-to-date and must accurately reflect the correct eligibility category of students. The names of children who have withdrawn from the institution should be marked off, and the date of withdrawal should be noted. Newly enrolled students must be added and the date noted. Point-of-service may be done as simply as an "X" or a hash mark on a sheet of paper for each child being served a first meal. The paper must include the date and the type of meal being counted and maintained as documentation of numbers claimed for that meal on that date.

Schools cannot use a morning count for counting reimbursable meals. Children who were counted in the morning might not be eating when it is lunch time or there might be new children eating who were not counted earlier. Meals must be counted only when the child receives the reimbursable meal.

*Please note that if a child is not eating with the normal population due to reasons such as detention, schools still need to allow all students the same choices as any other student. The NSLP and SBP cannot be used as a form of punishment. Students can choose their meal, have their meal counted at the point of service, and then be required to eat somewhere else outside the cafeteria.

Non Reimbursable Meals

The following items are **not** reimbursable and must not be included in the meal counts reported on the Claim for Reimbursement.

- Evening meals like supper
- Meal supplements such as snacks UNLESS on the After School Snack Program
- Adult meals
- Second meals eaten by eligible children
- A la carte items
- Meals given to students to take home
- Meals not meeting the meal pattern requirements, e.g. a tray with only 1 or 2 components
- Pitch in meals provided by families or communities that do not meet the meal pattern

Quick Guide to Reimbursable Meal Periods

	Weekends	Summer	Regular Week
Breakfast	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.
Lunch	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.

After School Snack	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.	ONLY if regular school is in session, can you claim. If regular school is not in session, you cannot claim.

Internal Controls

A school must establish internal controls to identify potential problems in the meal count system and to ensure that an accurate Claim for Reimbursement has been made. Internal controls protect schools from having erroneous claims and potential over claims. Edits and monitoring are the two required internal controls.

Edit Checks

Daily meal counts should be entered on an edit-check sheet which is a mandatory record for schools. The attendance factor for school is considered either the State's attendance factor or the individual school's attendance factor.

IDOE Edit Checks Webpage: https://www.doe.in.gov/nutrition/edit-checks

Monitoring

Every school year, each school with more than one site/building must perform at least one On-Site Lunch Review of each site under its jurisdiction. Additionally if operating the SBP at more than one school, half of the schools that operate SBP must be reviewed in one year and the other half of the schools must be reviewed the next year.

The on-site reviews must take place prior to February 1 of each school year. Furthermore, if the review discloses problems with a site's meal counting or claiming procedures, the school must: 1) ensure that the site corrects the problem; and 2) within 45 days of the review, conduct a follow-up on-site review to determine that the problem has been corrected. Please contact the SA for monitoring procedures and review forms.

IDOE On-Site Review Webpage: https://www.doe.in.gov/nutrition/site-review

Written Instruction

It is highly recommended that each site within a school maintain written instructions for all personnel which detail the operation of the meal count system and the responsibilities and duties of each person involved.

Reimbursement Claim

The Claim for Reimbursement and instructions are found in the online CNPweb system. The information used to complete this form will be obtained from the school's point-of-service counting records, which have been consolidated on the daily meal count sheet. While only the Claim for Reimbursement is filed with the SA, it is required that all evidence be maintained on file to substantiate the data reported on the claim. This includes all participation records.

Submit the original Claim for Reimbursement as soon as possible after the month is over, but within 60 days after the end of the month for which the claim applies. It is important to remember that any claim submitted later than 60 days after the end of the claiming month will only be approved upon submitting a "one-time exception" explanation by letter or email. Sponsors get only one 'one- time exception' in a three year period.

It is important to note that school cannot use NSLP to claim reimbursement for meals served at supper time or in the evening. A lunch served under the NSLP is defined as a meal served to children around mid-day, specifically between the hours of ten and two o'clock. A meal served at a time which is traditionally considered the last meal of the day would not be in accordance with this requirement and would not be eligible for reimbursement. Schools can contact Child and Adult Care Food Program to see if they qualify to implement the At-Risk Supper Program to their students.

IDOE Reimbursement Webpage: https://www.doe.in.gov/nutrition/snp-pricing-guidance

Provision

Community Eligibility Provision (CEP)

CEP is an alternative to collecting, approving, and verifying free and reduced applications in high poverty local educational agencies (LEAs) for schools participating in the National School Lunch and School Breakfast Programs. Sponsors must agree to serve both breakfast and lunch at no charge to all students and claim the meals at corresponding free and paid rates. Sponsors must use funds from the general fund or profits from a la carte sales to subsidize the cost of the paid meals

Reimbursement is based on claiming percentages derived from the identified student percentages. The Identified Students are students certified for free meals through means other than individual household applications; this primarily includes students who are directly certified for free meals on the basis of their participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and the Food Distribution Program on Indian Reservations (FDPIR). It also includes homeless, runaway, Head Start, and migrant youth. It does not include students who are categorically eligible based on submission of a free and reduced price application. For new participation, the school must have one or more school buildings having an identified student percentage of 40% or greater as of April 1.

IDOE CEP Webpage: http://www.doe.in.gov/nutrition/community-eligibility-provision-cep

Provision 2

This Provision reduces application burdens and simplifies meal counting and claiming procedures. It allows schools to establish claiming percentages and to serve all meals at no charge for a 4 year period. Schools must serve meals to all participating children at no charge for a period of 4 years. During the first year, or base year, the school makes eligibility determinations and takes meal counts by type.

During the next 3 years, the school makes no new eligibility determinations and counts only the total number of reimbursable meals served each day. Reimbursement during these years is determined by applying the percentages of free, reduced-price, and paid meals served during the corresponding month of the base year to the total meal count for the claiming month. The base year is included as part of the 4 years.

At the end of each 4 year period, the State agency may approve 4 year extensions if the income level of the school's populations remains stable.

Schools electing this alternative must pay the difference between Federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than Federal funds.

Provision 3

This Provision reduces application burdens and meal counting and claiming procedures. It allows schools to simply receive the same level of Federal cash and commodity assistance each year, with some adjustments, for a 4 year period.

Schools must serve meals to all participating children at no charge for a period of 4 years. These schools do not make additional eligibility determinations. Instead, they receive the level of Federal cash and commodity support paid to them for the last year in which they made eligibility determinations and meal counts by type, this is the base year. For each of the 4 years, the level of Federal cash and commodity support is adjusted to reflect changes in enrollment and inflation. The base year is not included as part of the 4 years.

At the end of each 4-year period, the State agency may approve 4-year extensions if the income level of the school's population remains stable.

Schools electing this alternative must pay the difference between Federal reimbursement and the cost of providing all meals at no charge. The money to pay for this difference must be from sources other than Federal funds.

IDOE Provision 2/3 Webpage: http://www.doe.in.gov/nutrition/snp-provisions-1-2-and-3

Universal Feeding

Schools can decide to provide breakfast and/or lunch at no charge as long as they can offset expenses using a fund separate from the non-profit, food service funds. Schools are still required to distribute free/reduced applications and claim the meals provided at free, reduced, or paid rates, but none of the students would be charged.

This process is often used when schools operate breakfast in the classroom. This encourages participation and takes the stigma away from breakfast when all kids can receive it for free.

Administrative Review

Technical Assistance

Each area of the state of Indiana has a School Nutrition Specialist assigned to assist sponsors in all aspects of program compliance. You can find the name of your field specialist by looking in the CNPweb on the Packet Tab. Your field specialist is available to assist you in menu planning, determining eligibility status, production records, as well as general program compliance. Sponsors are highly encouraged to get to know their field specialist and to use them as resource in your Child Nutrition Program planning.

State Agency Compliance Reviews

Administrative Review

USDA requires a SA to conduct one Administrative Review of each School Food Authority at least once during each 3-year review cycle. The Administrative Review will be conducted by state reviewers and in some cases a representative of USDA may accompany the review team. Reviews may be conducted more frequently at state agency discretion.

What is an Administrative Review?

The Administrative Review focuses on all federal compliance aspects of the school foodservice operations. It will include a thorough review of all documents related to the meals claimed for reimbursement, eligibility status of participants, claim filing process, food inventory, expenditures, food safety requirement, menu planning, nutritional standards as well as a meal observation for each meal type claimed for reimbursement. Sponsors are expected to daily maintain all documentation required for federal compliance; therefore additional time to prepare for an Administrative Review should not be necessary.

The two critical performance standards (PS) of the Administrative Review are: PS1 – all free, reduced price and paid lunches, and breakfast where participating, claimed for reimbursement are served only to children eligible for those meals; and are counted, consolidated and reported through a system which consistently yields correct claims; and PS2 – all meals (breakfasts and lunches) claimed for reimbursement contain all food items/components in appropriate serving sizes including vegetable subgroups, as required by program regulations.

The Administrative Review will cover the following sections:

Section 1: Access and Reimbursement

- Applications
- Direct Certification
- Verification
- Benefit Issuance
- Meal Counting, Claiming, and Reimbursement

Section 2: Nutritional Quality/Meal Pattern

- Dietary Specifications and Nutrient Analysis
- Multiple Meal Service Lines
- Offer versus Serve

Section 3: Resource Management

- Nonprofit School Food Service Account
- Paid Lunch Equity
- Revenue from Nonprogram Foods
- Indirect Costs
- USDA Foods

Section 4: General Program Compliance

- Civil Rights
- SFA On-Site Monitoring
- Local Wellness Policy
- Smart Snacks
- Professional Standards
- Water
- Food Safety
- Reporting & Recordkeeping
- SBP & SFSP Outreach

Section 5: Other Federal Program Reviews

- Afterschool Care Snack Program
- Seamless Summer Option
- Fresh Fruit and Vegetable Program
- Special Milk Program

IDOE Administrative Review Webpage: http://www.doe.in.gov/nutrition/snp-administrative-review-information

Resources

- **IDOE Online Trainings on inTEAM**
  - o View all of IDOE's past coffee break webinars alongside other trainings on important topics for sponsors. These online trainings are continuously updated and new trainings are being added frequently!
- **Indiana's No Time to Train Lesson Plans**
  - o Short lessons on important kitchen topics, including fruit and vegetable preparation, weights and measures, and how to use specific equipment
- **The Institute of Child Nutrition (ICN)**
  - o ICN's online training database houses trainings on a wide variety of topics including food safety, meal pattern, and customer service.
- **Indiana School Nutrition Association (ISNA)**
  - o The Indiana School Nutrition Association hosts various in-person trainings throughout the year on specific topics and hosts other larger conferences with an array of speakers on different topics.
- **USDA Policies**
  - o Find all of the up-to-date policies and memos from the USDA about the School Nutrition Programs on their website.