

School Nutrition Programs

An Operational Overview of Child Nutrition Programs for the
Business Manager

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Materials

<https://www.msbo.org/msbo-certification-program/msbo-certification-class-materials/>

School Meals Make A Difference!

School meals provide the fuel required for student learning & achievement.

A quality food service program (One that is both financially sustainable and nutritionally sound),
Provides a competitive disadvantage to your district over those that do not.

Overview Of Session

- Funding & Revenue Sources for CN Programs
- Regulations and Requirements
- Regulatory Changes / Nutrition Programs during COVID
- F/R Eligibility & Reporting

Overview Of Session

- Health Department, Food Safety and Sanitation requirements
- Financial Oversight & Key Metrics
- Legislative and Policy Updates
- On-line Resources & Links

National School Lunch Program: “A Measure of National Security”

1946 Child Nutrition Act (CNA):

- *Safeguard the health and well-being of the Nation's children.*
- *Encourage the consumption of agricultural commodities.*
- *Align with Dietary Guidelines for Healthy Americans.*

2010 Healthy Hunger Free Kids Act (HHFKA)

HHFKA: 84 Pages, 72 Sections

2 Main Purposes:

1. To increase access to healthy foods for kids & families
2. To address the complex issues of childhood obesity & hunger

Michigan Mandate for School Meal Programs

- K-12 public school districts are mandated to operate the **National School Lunch Program**
- K-12 public school districts are mandated to operate the **National School Breakfast Program** in any school building having 20% or more of its enrollment eligible for free/reduced priced meals
- Meal programs are Governed by USDA
- Funded and legislated by Congress
- Meals designed around nutrient standards and Dietary Guidelines for Americans

Focus of School Meal Patterns reflects Dietary Guidelines for Americans

- Offer more fruits, vegetables and whole grains
- Offer only fat-free or low-fat fluid milk
- Reduce sodium content
- Control Saturated Fat and Calorie Levels



Chain of Command

Congress and the President

US Department of Agriculture

Michigan Department of Education

School Food Authorities

Local Food Service Programs



Child Nutrition Programs

More than just School Lunch!

- Breakfast (NSBP)
- Lunch (NSLP)
- Special Milk
- After School Snack
- Supper
- Summer Feeding (SFSP)
- Childcare
- Head Start
- Senior Nutrition
- Emergency Feeding
- Fresh Fruit & Veg Grant

National School Meals

- One of the largest segments of the food service industry
- Annually
 - \$35+ Billion Industry



Michigan FY 2018 and FY 2021 (Pre Pandemic & Current)

- 63,348,342 Breakfasts 2018
- 75,476,580 Breakfasts 2021
- 122,490,295 Lunches 2018
- 95,078,921 Lunches 2021
- 1,506,772 K-12 Enrollment 2018
- 1,410,457 K-12 Enrollment 2021 (Oct 2020)
- 730,891 F/R Eligibility Rate: 50.0%
- 2018 70.3% meals served to F/R eligible students
- 2021 All breakfast & lunch meals served free of charge

Federal Reimbursement Dollars Paid to MI School Food Authorities

FY 2021

\$554,844,396



State & Federal Funding for School Meal Programs

- Federal Meal Reimbursements
- State Supplemental Funds
 - 31d and 31f
 - 31a – districts shall provide up to \$10 to breakfast
- USDA Foods Entitlement
 - Based on 2018-2019 SY total number of qualifying student lunches
 - Rate per meal changes annually
 - Current rate is \$.260 per meal at the federal level

Michigan Ten Cents a Meal Grant

Local Revenue Categories

- Student Meal Sales
- A la Carte
- Vending & Concessions
- Catering
- Adult Sales



SSO Reimbursements for 2022

	Rural or self-prep sites	All other types of sites		
Breakfast	2.6050	2.5550		
Lunch or Supper	4.5625	4.4875		
Snack	1.0775	1.0525		

NSLP & NSBP Breakfast & Lunch Reimbursement Rates 2021-2022 SY

	Breakfast Non-Severe Need	Breakfast Severe Need	Lunch Less than 60% F/R	Lunch Less than 60% F/R + \$.07	Lunch 60% or More F/R	Lunch 60% or more F/R + .07
Paid	\$0.33	\$0.33	\$0.35	\$0.42	\$0.37	\$0.44
Reduced Price	\$1.67	\$2.05	\$3.26	\$3.33	\$3.28	\$3.35
Free	\$1.97	\$2.35	\$3.66	\$3.73	\$3.68	\$3.75

Severe Need Rates

- *Severe Eligibility Rates are calculated annually*
- Breakfast
 - If 40% or more of the total lunches in a **building** in the preceding year were free or reduced-price.
(2021-2022 eligibility was determined using 2018/19 participation rates)
- Lunch - Entire district is eligible if:
 - 60% or more of the total lunches served **district wide** in the preceding year were free or reduced-price.

\$.07 Certification Reimbursement (HHFKA Performance Based Reimbursement)

\$.07 Performance Based Reimbursement is provided for SFA's that demonstrate compliance with 2012 meal pattern requirements.

Regulations and Requirements



Meal Patterns and Nutrition Standards

1. Fruits & Vegetables: portion & variety requirements for breakfast & lunch. Must take $\frac{1}{2}$ cup fruit at breakfast, must take $\frac{1}{2}$ cup fruit or vegetable at lunch.
2. Whole Grains: “whole grain rich” standards on all grain items for breakfast & lunch.
3. Limits on Calories, Sodium & Saturated Fat by age/grade group (k-5, 6-8 and 9-12)

Offer Versus Serve

A strategy that:

- Allows students flexibility in food component and food item selection
- Reduces food waste
- Is mandatory for HS NSLP
- Is optional in SBP, all levels



Offer Versus Serve

For lunch to be reimbursable, students must:

- Select at least 3 full components
- Must select at least $\frac{1}{2}$ cup of either a fruit or vegetable, or combination of F/V

Students may:

- Decline 2 or 5 required components, including the entrée or milk
- Take smaller portions of declined food items (this does not affect the price)

Challenges of Current Meal Pattern

- **UPDATE WITH COVID CHALLENGES:**
OMB has reported the cost to produce a school lunch has increased an average of \$.36 per meal since 2012, yet the performance based reimbursement is at \$.07.
- Plate waste and student acceptability of updated meal pattern & healthier alternatives remain top concerns related to program costs and revenue.
- Increased food costs and decreased student participation has created a revenue gap in many districts.

Poll the Audience

Has your district experienced increased food costs, increased supplies cost, and/or labor shortages, since the onset of the pandemic?

1. Yes, we've experienced an increase in food costs.
2. Yes, we've experienced an increase in food/supply costs.
3. Yes, we've experienced labor shortages.
4. Yes, we're experiencing all 3.
5. No, we aren't experiencing any of the above.

Dietary Specifications for School Meal Programs

Daily Amounts are based on Average for 5-Day week	BREAKFAST			LUNCH		
	K-5	6-8	9-12	K-5	6-8	9-12
Calories (Min – Max)	350 - 500	400 - 550	450 - 600	550 - 650	600 - 700	750 - 850
Sat Fat (% of total Calories)	< 10 %	< 10 %	< 10 %	< 10 %	< 10 %	< 10 %
Sodium (mg)	< 540mg	<600mg	<640mg	<1230mg	<1360mg	<1420mg
Trans Fat	0 gm per serv	0 gm per serv	0 gm per serv	0 gm per serv	0 gm per serv	0 gm per serv

AT A GLANCE

CHILD NUTRITION PROGRAMS: Transitional Standards for Milk, Whole Grains, and Sodium Final Rule

This new rule establishes standards for milk, whole grains, and sodium for school years 2022-2023 and 2023-2024 to give schools time to transition in the short term. Meanwhile, USDA is working to develop long-term nutrition standards - based on the newest DGA and extensive input from a wide range of partners - that will work for schools, families, and industry alike. USDA expects to publish a proposed rule on the updated standards in fall 2022.

SUMMARY OF CHANGES



MILK

Schools and child care providers may offer flavored, low-fat milk (1%) in addition to unflavored, low-fat milk and flavored or unflavored nonfat milk¹.



SODIUM

The weekly sodium limit for school lunch and breakfast will remain at the current level, known as Target 1, for school year 2022-2023. For school lunch only, the limit will decrease marginally (10%) in school year 2023-2024 to put schools on an achievable path toward long-term sodium reduction, which will be addressed in future rulemaking.



WHOLE GRAINS

At least 80% of the grains served in school lunch and breakfast per week must be whole grain-rich (containing at least 50% whole grains).

¹For consistency, this standard applies to the National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program (ages 6 and up), and Special Milk Program (ages 6 and up).

Accommodating Special Dietary Needs

- Documented disability
 - **Must** make the substitutions as listed by the physician
- Without a documented disability
 - **May** make the substitutions listed on the medical statement form signed by a recognized medical authority
- As of July 1, 2017, Lactose Intolerance & Gluten Sensitivity are considered disabilities

Special Diet Statement

Special Diet Statement

Why am I being asked to fill out this form?

Institutions or organizations who sponsor and operate a federally funded Child Nutrition Program must make reasonable substitutions to meals and/or snacks on a case-by-case basis for participants who are considered to have a disability that restricts their diet.* According to the ADA Amendments Act, most physical and mental impairments that substantially limit or affect one or more major life activities or bodily functions will constitute a disability.

Sponsors are not required to accommodate special dietary requests that are not a disability. This includes requests related to religious or moral convictions or personal preference. If these requests are accommodated, sponsors must ensure that all USDA meal pattern and nutrient requirements are met.

This form must be completed by a licensed physician, physician assistant, or an advanced practice registered nurse, such as a certified nurse practitioner. Updates to this form are required only when a participant's needs change.

Note to Districts/Schools: Parents/Guardians may provide a written request for lactose-free milk without a physician's signature. Lactose-free milk served must meet meal pattern requirements for the program.

Submit this completed special diet statement to: _____

Participant Information:

Participant's Full Name: _____ Today's Date: _____

Date of Birth: _____

Name of School/Center/Site Attended: _____

Parent/Guardian Name: _____

Home Phone Number: _____ Work Phone Number: _____

Required Information: Dietary Accommodation

- List the food to be avoided: _____
- Briefly explain how exposure to this food affects the participant: _____
- List foods to be omitted and substituted. Attach a sheet with additional instructions as needed.

Foods to be Omitted	Foods to be Substituted

Additional Information

☐ Texture Modification: ☐ Pureed ☐ Ground ☐ Bite-Sized Pieces ☐ Other: _____

☐ Tube Feeding Formula Name: _____

Administering Instructions: _____

Oral Feeding: ☐ No ☐ Yes If yes, specify foods: _____

☐ Other Dietary Modification or Additional Instructions (Describe): _____

*School Nutrition Program - 7 CFR 210.10(m), Child and Adult Care Food Program - 7 CFR 226.20 (g), Summer Food Service Program - 7 CFR 225.16(f)(4).

Required Signature

This form must be signed by a licensed physician, physician assistant, or advanced practice registered nurse such as a certified nurse practitioner. The medical person signing it should keep a copy of this document in his/her records.

Prescribing Authority Credentials (print): _____ Date: _____

Signature: _____ Clinic/Hospital: _____

Phone Number: _____ Fax Number: _____

Voluntary Authorization

Note to Parent(s)/Guardian(s)/Participant: You may allow the director of the school/center/site to talk with the medical person about this Special Diet Statement by signing the Voluntary Authorization section:

In accordance with the provisions of the Health Insurance Portability and Accountability Act (HIPAA) of 1996 and the Family Educational Rights and Privacy Act I hereby authorize _____ (physician/medical authority name) to release such protected health information as is necessary for the specific purpose of Special Diet information to _____ (program name) and I consent to allow the physician/medical authority to freely exchange the information listed on this form and in their records concerning me, with the program as necessary. I understand that I may refuse to sign this authorization without impact on the eligibility of my request for a special diet for me. I understand that permission to release this information may be rescinded at any time except when the information has already been released. Optional: My permission to release this information will expire on _____ (date). This information is to be released for the specific purpose of Special Diet information. The undersigned certifies that he/she is the parent, guardian, or authorized representative of the participant listed on this document and has the legal authority to sign on behalf of that participant.

Parent/Guardian: _____ Date: _____

OR Participant's Signature (Adult Day Care ONLY): _____

Non-Discrimination Statement

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

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

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf) (https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf), (AD-3027) found online at: [How to File a Complaint](https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint) (<https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint>), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

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

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Important Regulatory Sections

- ☐ Smart Snacks Final Rule
- ☐ Local Wellness Policy Final Rule
- ☐ Professional Standards Final Rule
- ☐ Administrative Review Process

“Smart Snacks” Regulations

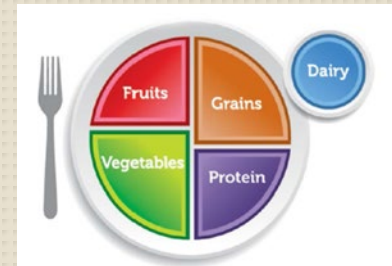
- Regulations for “All Foods Sold in Schools” aka “Smart Snacks” are Nutrition Standards for all foods and beverages sold in schools
 1. Outside the school meal programs
 2. On the school campus
 3. At any time during the school day (from Midnight until 30 minutes after the last school bell)



“Smart Snack” Nutrition Standards for All Food Sold on the School Campus

- Nutrition Standards for Snacks:
 - Whole grain rich OR
 - First ingredient must be a fruit or vegetable OR
 - Combination foods must have at least $\frac{1}{4}$ cup fruit/vegetable OR
 - Snack must contain 10% DV of key nutrients

- Nutrient Requirements:
 - Calorie, Sodium, Fat and Sugar limits



TIP: Use Smart Snack Calculator to determine allowability

Smart Snacks: Programs & Foods impacted



Programs & Foods Impacted

1. Foods Sold in School Stores
2. Food Sold in Vending Machines
3. Foods Sold for Fundraisers that are ready-to-eat (bake sales, etc)
4. Foods Sold in the cafeteria that are not part of the reimbursable meal.

Programs & Foods NOT Impacted

1. Foods sold in concession stands after the school day.
2. Food brought in from home by students (school lunch, snacks or class treats).
3. Food served/sold at Banquets on the school campus after the school day.
4. Foods sold for fundraisers that will be consumed at home (i.e. Pizza Kits, Market Day, Cookie Dough).

Smart Snacks & LWP Resources

- **Alliance for a Healthier Generation:** www.healthiergeneration.org/smartsnacks
 - Smart Snack Calculator
 - List of approved products
 - Other helpful info
- **USDA Smart Snacks site:** www.fns.usda.gov/school-meals/smart-snacks-school
 - Summary info
 - Regulations and details
- **Michigan School Nutrition Programs Smart Snacks site:**
www.michigan.gov/schoolnutrition --> "Smart Snacks"
 - To include list of products that meet Smart Snacks guidelines (by end of August '14)
 - PowerPoint turnkey
 - Handouts
 - Recommended fundraiser ideas
- ***Increasing Access to Drinking Water in Schools Toolkit***, from CDC:
http://www.cdc.gov/healthyyouth/npao/pdf/Water_Access_in_Schools.pdf

Local School Wellness Policy

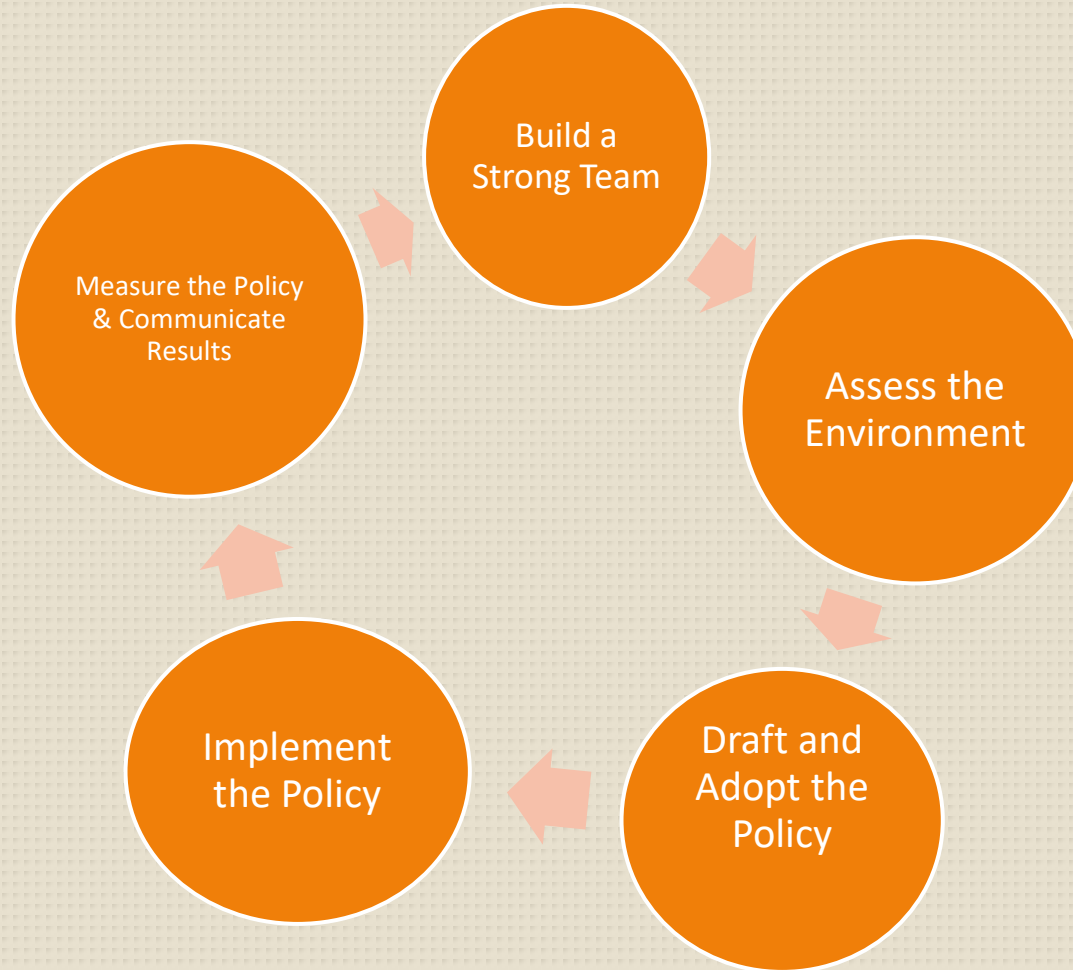
Final Rule was published on July 29, 2016. LWP requirements create a framework and guidelines for district written wellness policies established by LEA's.

Requires LEA's to develop, **implement and assess goals under** a School Wellness Policy, that required full compliance by June 30, 2017.

LWP Requirements for School Districts

- Sets specific goals for nutrition and physical activity.
- Establishes LEA's wellness policy leadership and responsibility of compliance with the LWP.
- Expands team collaboration of policy development and goal setting in an effort to foster strong stakeholder buy-in and support. LEA's must require participation by the general public and the school community.
- Enhances information made available to the public including content & implementation, and **triennial assessment** of compliance.

Local Wellness Policy Process



Drafting the Policy

Content Requirements of the Wellness Policy

SPECIFIC GOALS FOR

- Nutrition Promotion
- Nutrition Education
- Physical Activity
- Other School based activities that promote student wellness

NUTRITION GUIDELINES

For ALL Food and Beverages sold to students on the school campus during the school day that are consistent with Federal regulations.

For ALL food and beverages provided, but not sold, to students during the school day (classroom parties, snacks).

MARKETING POLICY

Policies for Food and Beverage marketing and advertising of only those foods and beverages that meet the Smart Snack in School nutrition standards.

Triennial Assessment Template

- Michigan Department of Education
- Office of Health and Nutrition Services
- School Nutrition Programs
-
- Local Wellness Policy:
- Triennial Assessment Summary
-
- **Background**
- The Healthy, Hunger-Free Kids Act of 2010 requires Local Educational Agencies (LEAs) to update or modify their wellness policy, as appropriate. When wellness committees meet on a regular basis throughout the school year, an assessment plan should be used to ensure progress is being made on the district's wellness policy and procedures.
- **Purpose**
- The template below is offered to help summarize the information gathered during your assessment. Members of a school wellness committee who are completing the triennial assessment for their school wellness policy may use this template. It contains the three required components of the triennial assessment, including 1) compliance with the wellness policy, 2) how the wellness policy compares to model wellness policies, and 3) progress made in attaining the goals of the wellness policy.
- **Results**
- The copy of the assessment must be made available to the public. How the assessment is made available is the decision of the LEA. Many LEA's choose to post the results on their district website. The triennial assessment summary and the assessment details must be shared.
- **Recordkeeping**
- Keep a copy of the most recent triennial assessment, along with supporting documentation on file. This will be needed when you have a School Nutrition Program administrative review.
- **Resources**
- <https://www.fns.usda.gov/tn/local-school-wellness-policy>
- https://www.michigan.gov/mde/0,4615,7-140-66254_50144-194546--,00.html

Section 1: General Information

School(s) included in the assessment:

Month and year of current assessment: _____

Date of last Local Wellness Policy revision: _____

Website address for the wellness policy and/or information on how the public can access a copy:

Section 2: Wellness Committee Information

How often does your school wellness committee meet? _____

School Wellness Leader:

Name	Job Title	Email Address

School Wellness Committee Members:

Name	Job Title	Email Address

Section 3. Comparison to Model School Wellness Policies

Indicate the model policy language used for comparison:

- 1)Michigan State Board of Education Model Local School Wellness Policy
- 2)Alliance for a Healthier Generation: Model Policy
- 3)WellSAT 3.0 example policy language

Describe how your wellness policy compares to model wellness policies.



Section 4. Compliance with the Wellness Policy and progress towards goals

At a minimum, local wellness policies are required to include:

- Specific goals for:
 - Nutrition promotion and education
 - Physical activity
 - Other school based activities that promote student wellness.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day (e.g., in classroom parties, classroom snacks brought by parents, or other foods given as incentives).
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

Using the table below to indicate the progress made with each goal included in the Wellness Policy. The table may be used for each school separately or the district as a whole.

Tip: When developing a wellness plan, ensure activities are meeting goals by developing SMART objectives:

- **Specific:** Identify the exact area to improve.
- **Measurable:** Quantify the progress.
- **Attainable:** Determine what is achievable.
- **Realistic:** Consider resources and determine what can reasonably be accomplished.
- **Time bound:** Identify deadlines for goals and related tactics.

The Centers for Disease Control and Prevention (CDC) has tips for developing [SMART objectives](#).

Michigan Department of Education Local Wellness Policy Assessment Plan

School Name: _____ Date: _____

Nutrition Promotion and Education Goal(s):

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?
Example: Food and beverages will not be used as a reward for students.	a) Provide teachers with list of non-food reward examples. b) Discuss changes at back-to-school staff training. c) Follow-up mid-year to discuss challenges and determine additional communication needed.	Before the beginning of next school year.	<ul style="list-style-type: none"> • Verbal check-ins with staff to ensure to compliance. • Teachers survey at end of school year. 	Principal	Teachers, staff, students	Yes

Physical Activity Goal(s):

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?

School-based activates to promote student wellness goal(s):

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?

Nutrition guidelines for all foods and beverages for sale on the school campus (i.e. school meals and smart snacks):

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?

Guidelines for other foods and beverages available on the school campus, but not sold:

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?

Marketing and advertising of only foods and beverages that meet Smart Snacks:

Goal What do we want to accomplish?	Action Steps What activities need to happen?	Timeline Start dates	Measurement How is progress measured?	Lead Person	Stakeholders Who will be involved and/or impacted?	Complete?

A final thought on Smart Snacks & Local Wellness Policies

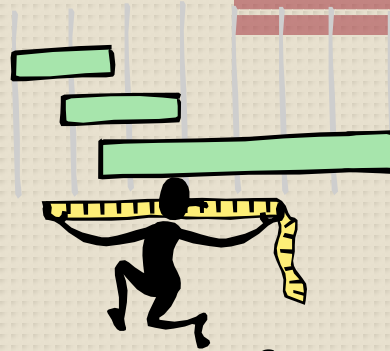
Administrative Policy 21 & PA 42

Michigan Non-Compliant Food Fundraiser Guidance

“The Michigan Department of Education (MDE) will allow up to two food-based fundraising activities per week that do not meet the USDA Smart Snacks in Schools standards. These exemptions are optional and chosen at the local level by each school building”.

If your district's goal is to have non-food/ Smart Snack compliant fundraisers, make sure your Local Wellness Policy states this.

Poll the Audience



Concerning the implementation of your Local Wellness Policy (LWP), which statement below best describes your district:

- a) Local Wellness Policy is published and on our website.
- b) Your school district has an active LWP Committee that has met this year.
- c) Local Wellness Policy Triennial Assessment has been completed.
- d) All of the above are true for our district.
- e) Unsure of district LWP status.

BREAK



When we
return, we'll
spin the wheel
for a gift card
prize!



Administrative Review (AR) Process:

Measuring compliance of USDA Regs

- MDE conducts an **Administrative Review every 5 years** inclusive of all Federal feeding programs within a district (NSLP, SBP, & Snack). *Districts with critical violations will be reviewed every 3 years.*
- Technical Assistance is provided when non-compliance is noted. Financial penalties assessed on critical findings (F/R lunch Apps, POS, Verification)
- Summer SFSP & CACFP Admin Reviews remain every 3 years

Administrative Review (AR)

- Off-Site Assessment and On-site Assessment/Visit
- Review Cycle = every 5 years
- AR review Training provided for districts in the year they are up for review.
- Five Sections to the review

Civil Rights, Verification, Nutrition Quality & Meal Pattern, Meal Access & Reimbursement, Other Federal Programs (CEP, after school and grant programs)

- Separate reviews are conducted for
Resource Management & Procurement

School Meals Professional Standards

Final Rule effective July 1, 2015

- USDA established Professional Standards for school nutrition personnel who administer, manage & operate the NSLP & NSBP.



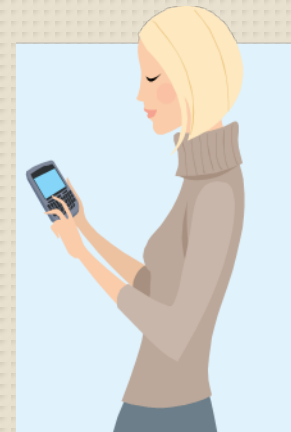
Professional Standards:

Annual Training Requirements

POSITION:	ANNUAL TRAINING REQUIREMENTS:
Directors	12 Hours
Managers	10 Hours
Staff (20+ Hrs per week)	6 Hours
Part-Time Staff (< 20 hrs per week)	4 Hours

Four Key areas for School Nutrition Training

- Nutrition
- Operations
- Administration
- Communications/Marketing



- Training can be received in any or all of these areas
- School nutrition director ultimately responsible for tracking and documentation

Hiring Standards for District Level Directors

- Hiring standards are minimum education requirements for Food Service Directors. Education requirements are based on student enrollment of the district. There are 3 categories:
 1. 2,499 Students or Fewer
 2. 2,500 to 9,999 Students
 3. 10,000+ Students or more (minimum: Bachelors +)

NOTE: Directors hired before **July 1, 2015** will be grandfathered into their current positions, which means they ***do not*** have to meet the hiring requirements in order to stay in their present position at their district/school.

Professional Standards:

Hiring Requirements

Student Enrollment	2,499 or Less	2,500 – 9,999	10,000 or More
	HS Diploma + 3 yrs Experience OR Associates Degree OR Bachelors Degree	Assoc Degree + 2yr Experience OR Bachelors Degree + 2 yrs Experience	Bachelors Degree + 5 yr Experience (Specific major in food/nutrition, FS Mgt, Business, Culinary, Dietetics)

Supervising your Food Service Director

- Technical skills and expertise
- Leadership ability
- Partnership and membership on leadership team
- Professional development opportunities
- Networking

Professional Standards



Local Meal Charge Policy

- USDA memo SP 46-2016 July 8, 2016
- Written policy required by July 1, 2017
- Clearly communicated in writing to school administrators, school nutrition staff, families, and students.
- Key Policy Considerations:
 - Maintain financial integrity of programs
 - Provide kids with adequate nutrition to focus in school
 - Minimize stigmatization of children with meal charges

Avoiding Lunch Shaming

Discouraged Actions	Encouraged Actions
Announcing or publicizing the names of children with unpaid meal charges	Communicating your district Meal Charge Policy & Bad Debt Policy in writing in a variety media methods.
Using hand stamps, stickers, or other physical markers to identify children with unpaid meal charges	Communicating debt reminders directly and discreetly to adults in the household
Sending clearly marked notices home when children have an outstanding balance	Avoid any confrontation with students.
Throwing a child's meal in the trash if they are unable to pay & providing different meal than what other kids are served.	Serving children standard reimbursable meal at the point of service. Work with parent to obtain payment on back end.

Bad Debt Policy

- Updated definition of **bad debt** / Admin Memo #4 Uncollectable meal Charge requirements
- Bad Debt is “uncollectable meal balances for **inactive students** as of June 30th that have not been collected by December 31st of the same calendar year”.
- “Inactive Students” = students that have left the school district or graduated.
- The important take-away: at this time **student debt for active students is required to remain on a student accounts until the student becomes inactive.**

Certifying Students for Meal Benefits

Free & Reduced-Price Meal Applications & Eligibility

- Family Application – Required
- Applications accepted any time during the school year
- Eligibility Guidelines
 - Income based on household size
 - Categorical – Food Stamp, TANF, FDPIR, Homeless, Runaway, Migrant, Foster Care, Medicaid
 - Extending Categorical Eligibility to Additional Children in a Household – Admin Memo#3, 2009

Direct Certification: Important & Required

- Direct Certification - Required (District matches SIS data base to State SNAP data base for DC match list)
- Direct Certification
 - Required a minimum of three times per (best practice Monthly!)
 - Foster care, SNAP, TANF, Medicaid Eligible
 - Pandemic EBT (P-EBT)
 - First file available near the beginning of the SY
 - Refresh files are available monthly
 - Remember - DC impacts Title1 funding!

Sharing of Student F/R Eligibility Status

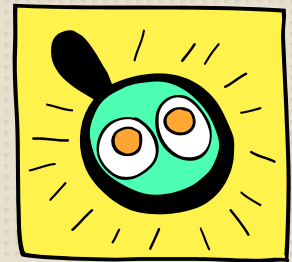
- Sharing of F/R eligibility can only be done with parent consent.
- Signed “Sharing of Information” form must be filled out annually.
- If F/R eligibility is shared with other programs without parent consent, a Civil Rights complaint can be filed by participant.

Free and Reduced-Price Documentation & Record Keeping Requirements

- Verification
- Audit Sample pulled by Oct 15th
- Completion of Verification due by Nov 15th
- SFA-VCR Report Due Feb 1 in MDE NexSys.
- Public Release of F/R Meals & Eligibility Chart
- Disclosure of Information – Sharing Information

CEP Community Eligibility Provision

- CEP eligibility of SFA is determined by Directly Certified (food stamp eligible) students.
- 40% or higher by building is required
- Claim rate formula by building:
 $\# \text{ of DC Students} / \text{by enrollment} * 1.6 = \text{Claim Rate}$
- Medicaid Direct Certification Pilot began July 1, 2017



Example: 200 DC students/300 Enrollment = .66% x 1.6 = 100%
(Magic Number is 62.5% or higher for 100% Claim Rate)

Advantages of CEP

Advantages:

- Can be done by building or throughout district
- Increased Participation
- Ease of Claiming at Point of Service
- No F/R Applications or Verification Required

Important Note.....

- Family household surveys required to determine economically disadvantaged students for Title 1, E-rate & grants can be difficult to get this information, but Title 1 and E-rate have addressed this issue in formulation.

A Word about FID Reporting

- Cost per meal used to determine 31f funding

- 25K Rule

“Indirect rates should only be applied by the district to the first \$25,000 of any contract or sub-grant related to a federal grant.”

Unrestricted Indirect Cost Rate

- Maximum
 - 15% Public Schools
 - 12% Non-Public Schools



Applied to all expense EXCEPT food & contracts
“These rates can be used to reimburse the general fund for administrative and other costs that are not easily allocated to a particular program at the district.

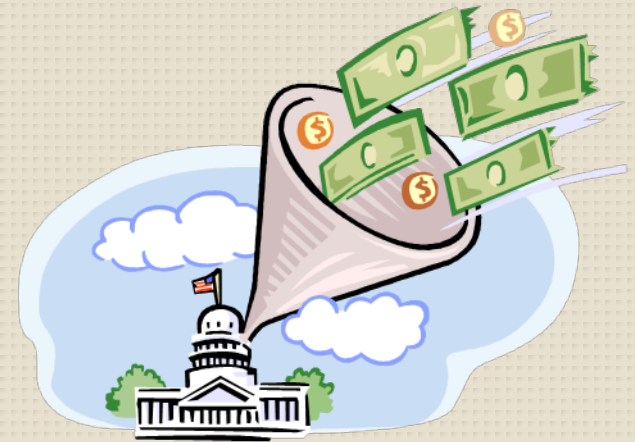
- Final Indirect Cost Rate Summary Report – R0418 – found at MDE website under Grants Coordination and School Support – Fiscal Reporting

Procurement Requirements



- Federal Regulations
 - Competitive Bidding and Threshold
 - Procurement Procedures for USDA Child Nutrition Programs – MDE Procurement Trainings occurring now throughout the state.
 - Admin Policy #13 SY 14-15
Request for Approval for Equipment & Other Capital Expenditures
 - Approval List for SNP for Single Items with cost of \$5,000 or more – Fillable Form
 - Procurement reviews are conducted on the same review schedule as Administrative review (they are separate)

USDA Foods Distribution Program



- USDA Foods Entitlement Dollars
 - Based on the number of LUNCH meals served in the previous SY multiplied by the annual per meal. **Current Commodity Entitlement Rate: \$.260 per lunch meal served based on the 2018-2019 school year lunch meals served.**
 - Bonus Commodities : additional foods acquired through price support and surplus removal programs (not guaranteed)
- The more lunch meals served the more entitlement \$\$ you get
- USDA food entitlement = about 12% of your food budget
- Can defray the cost of a meal by up to .26 per meal.

Consortia in Michigan

- Great Lakes Consortium (GLC)
- Macomb Oakland RESA (MOR)
- School Purchasing And Resource Consortium (SPARC)
- ***Districts must join a consortium to be eligible to receive USDA foods.***



Consortia Procurement

- ❖ Consortia procurement completed on behalf of member SFAs will be reviewed by MDE annually
- ❖ All purchases that an SFA makes through a consortia contract will be “covered” through the MDE review of Consortia Procurement
- ❖ Specifically, MDE will be reviewing samples of consortia:
 - ❖ Processing procurement documents
 - ❖ Distribution
 - ❖ Warehousing
 - ❖ Third party entities/Agents

NexSys: Web Based Annual Permanent Agreement

- Contract between SFA & MDE for Child Nutrition Programs
- In exchange for reimbursement dollars district agrees to follow ALL USDA/MDE program regulations



Meal Pricing Requirements

- PLE Tool
- Adult Meals
- Ala Carte Pricing Tool



Paid Lunch Equity (PLE) & Pricing

- PLE tool is required for SFA's to complete each year. MDE provides PLE tool (workbook) Keep on File for 3 years + current year.
- PLE compares the average price for paid lunches at all schools within a district to the difference between the per meal Federal reimbursement rate for free and paid meals
- Average "paid" category meal price must be at or above Free reimbursement rate (\$3.50) less the Paid reimbursement rate (approx \$3.09). Actual threshold is set annually by MDE. If average price falls below the established threshold meal prices need to be increased price by 2% plus inflation or add non-Federal funds to the food service account.
- Gradual increases – maximum increase required per year is \$0.10

Adult Meal Pricing

- Price adult meal higher than student meals
- At minimum, Adult Meals must be priced above the free reimbursement rate + USDA Foods entitlement + Sales Tax



- Adult Meals are a revenue generator and it's good customer service.

DIRECTIONS	SAMPLE	YOUR SCHOOL
SSO Reimbursement Rate	\$ 4.5625	
Value of USDA Foods for current year 2021-2022 SY	\$.260	
Subtotal	\$4.82	
Sales Tax	\$.290	
Total Minimum Price	\$5.11	

Assessment of Participation

- What is your %ADP?
 - Tracking
 - All categories – paid, reduced, and free
 - All buildings
 - Overall district
 - Daily, monthly, annually
 - Tracking using Meal Equivalents

Food Safety and Sanitation

- Food Law Updates
 - Licensing requirements by building (separate for concessions)
 - Plan review required for certain equipment, Mobile Food Truck and construction projects
 - Manager Certification (ServSafe) one per licensed location
 - Food Safety training for all staff
 - Cottage Food Law applies to district bake sales
- HACCP – Food Safety plan Required by USDA for School Meals Program. (Hazard Analysis Critical Control Point).
- USDA regulations – Two inspections per year per building

Poll the Audience

- What is your greatest concern about your district's food service operation?
 - a) Food and Supply Costs
 - b) Labor Challenges
 - c) Supply Chain issues – availability of Food and Supplies
 - d) All of the above (A, B, C)
 - e) Don't have any concerns



Best Practices: Tools for Managing Your School Food Service Business

- Implement Cycle Menus
- Use Mobile Phone app provided by POS software vendor for student on-line ordering, menu viewing & allergy info.
- Food Service webpage provides important Online Access of Information for parents & students:
F/R Apps, Parent Forms, Menus, Nutrition Information, Local Wellness Policy, Meal Program Access, Meal Charge Policies, Breakfast Outreach.
- Measure Key Performance Indicators (KPI's) – Meals per Man Hour, Cost per Meal, Average Daily Participation, Food Cost analysis


Management Options for your School Nutrition Program

- Self-Operated - FS Director employed by District
 - Shared Services - One FS Director oversees operations of 2 or more districts
 - Contract Management – FS Director is employed by a FSMC that is contracted with the district
-
- A Highly Qualified Director and Professionally Trained Staff

Outsourcing & Alternative Solutions for Food Service Program management

- Employees or Management or Both
- FSMC spells out each party's responsibility for the purchase of and payment for Food, Supplies, Labor
- District Monitoring of Contracts & Performance i
 - Participation & revenue tracking
 - Review P & L monthly
 - District is responsible for submitting monthly claim forms, program applications and F/R meal applications.
- System development and program goals for staff training, equipment, program expansion & growth
- **Leadership of your program remains critical**

Monitoring Food Cost

- Industry standards dictate a food cost not to exceed 40-45% of revenue.
- All menu's need to be costed out to insure costs fall within budgeted levels.
- Utilization of USDA foods (commodities) is critical to controlling food costs. USDA foods represent 12% of food costs. 

Measuring Labor Costs using MPLH

- Meals Per Labor Hour (MPLH) standards help operators to measure productivity. MPLH analysis compares Total Meals to Total Labor Hours to determine productivity levels for each kitchen.

OUTPUT (Total meals Served)

INPUT (Total Labor Hours) = PRODUCTIVITY

High Labor Cost?

Evaluate these factors.....

- Greater than 45-50% of total revenue
 - Too many labor hours allocated
 - Low productivity
 - Inadequate facilities and equipment
 - Lack of training and efficiency
 - Labor intensive menu
 - Planned schedule v. actual worked
 - Labor contract

Procurement Regulations

- 200.421 CNR effective July 1, 2017
- Buy American Provision
 - Domestic Language required in bid documents
 - Buy American Justification Form
- Micro-purchasing Threshold
- Other..
- All purchases outside of Coop subject to procurement review audit.

Formal vs. Informal for **Public Schools, Public School Academies & Intermediate School Districts**

Is your (aggregate) annual purchase valued over the small purchase threshold?

Federal = \$150,000 (Services)

Michigan = \$150,000 (Food)

Michigan = \$25,288 (Non-Food/Supplies)*


Local= Varies

NO



You can
conduct an
informal
purchase

YES



You must
conduct a
formal
purchase

Public Policy & Legislation for Child Nutrition Programs Reauthorization (CNR)

- Reauthorization of the Richard B Russel Child Nutrition Act. Currently program is operating under the 2010 CNR.
- Farm Bill impacts USDA Foods (commodity entitlement) for school meal programs & P-EBT.
- “Build Back Better” includes expanding CEP. Continuing Resolution for the federal budget may include extension of waivers. Future of CNR bill remains uncertain.

Advocating for CN Programs

- 2022 Position Paper provides insight into current issues for CN Programs. Here are some of the front burner legislative/regulatory issues for school meal operators & programs:
- Extend CN Waivers through SY 22-23
- Provide more revenue for school meals to cover higher food/labor costs
- Reduce meal planning complexities & provide continued flexibilities for Milk, Whole Grains and Sodium Requirements.

school meals

A VALUABLE & VITAL STUDENT STAPLE

Amid pandemic uncertainties, school meals remain a reliable source of nourishment for students, supporting their health and achievement while combatting food insecurity. However, persistent pandemic challenges threaten the stability of school meal programs that millions of American families depend on.

98%

of school meal programs are struggling with shortages of menu items, supplies and packaging



97%

are challenged by higher costs



95%

of schools have staff shortages



Congress must bolster the **NATIONAL SCHOOL LUNCH AND BREAKFAST PROGRAMS (NSLP/SBP)** to ensure all students are nourished and ready to learn:

EXTEND

child nutrition waivers through SY 2022/23 to address supply chain disruptions and continued pandemic challenges

PROVIDE

more revenue for school meals to cover higher food/labor costs

- ✓ Increase NSLP/SBP reimbursements
- ✓ Expand NSLP/SBP to offer free meals to all students

REDUCE

meal planning complexities

- ✓ Delay Target 2 sodium rules & eliminate Final Target
- ✓ Restore 50% whole grain rich rule
- ✓ Allow low-fat, flavored milk

CUT

the red tape

- ✓ Maximize staff time and funds for meal prep
- ✓ Implement Congressionally mandated Child Nutrition Reporting Burden Analysis Study



Feeding Bodies. Fueling Minds.®

LEARN MORE at SchoolNutrition.org/PositionPaper

Final Thoughts

- **Role of support services in your district**
 - How are they contributing to overall student success?
- **School Meal Programming**
 - Are you maximizing all of the programs available to your district?
 - Do you have a financially/nutritionally sound program?
 - Invest in your efforts (equipment, training, program expansion)

Additional Links

- Michigan School Business Officials: www.msbo.org
- School Nutrition Association of Michigan: www.michigansna.org
- School Nutrition Association: www.schoolnutrition.org
- USDA School Meals (main site): www.fns.usda.gov/cnd
- Action for Healthy Kids: www.actionforhealthykids.org
- Food Allergy & Anaphylaxis Network: www.foodallergy.org
- Michigan Dept. of Agriculture: www.michigan.gov/mda
- Eligibility Guidance for School Meals Manual:
<http://www.fns.usda.gov/cnd/Guidance/EliMan.pdf>

Thank You

- Carolyn Thomas, CN Consultant Macomb ISD
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- Lori Adkins, CN Consultant Oakland Schools
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Finalize Credit for Attendance

Return form to MSBO by February 11, 2022

- ✓ Return form to MSBO by February 11, 2022
 - E-mail – cbyam@msbo.org
- ✓ Receive e-mail from MOECS-noreply@michigan.gov to fill out an evaluation for SCECHs.
- ✓ Receive an email from survey monkey for the MSBO evaluation.