

School Nutrition Programs Administrative Handbook

**Illinois State Board of Education
Nutrition Department**

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Overview of Child Nutrition Programs

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Additional Resources

- USDA Child Nutrition Programs Website
<https://www.fns.usda.gov/school-meals/child-nutrition-programs>

Commonly Used Acronyms

AR	Administrative Review	LEA	Local Educational Agency
AFHK	Action for Healthy Kids	NSBW	National School Breakfast Week
AFR	Annual Financial Report	NSLW	National School Lunch Week
CACFP	Child and Adult Care Food Program	OVS	Offer versus Serve
CEP	Community Eligibility Provision	PAL	Planned Assistance Level
CNP	Child Nutrition Programs	PLE	Paid Lunch Equity
DoD	Department of Defense	PY	Program Year – October 1 through September 30
ECOS	Electronic Commodity Ordering System	RFP	Request for Proposal
FDP	Food Distribution Program	SFA	School Food Authority
FFVP	Fresh Fruit and Vegetable Program	SFSP	Summer Food Service Program
FNS	Food and Nutrition Service, USDA	SNA	School Nutrition Association
FSMC	Food Service Management Company	SNAP	Supplemental Nutrition Assistance Program
FY	Fiscal Year - October 1 through September 30	SNP	School Nutrition Programs
HACCP	Hazard Analysis and Critical Control Point	NSLP	National School Lunch Program
HUSSC	HealthierUS School Challenge	SBP	School Breakfast Program (Federal)
ICN	Institute of Child Nutrition (Formerly NFSMI)	SMP	Special Milk Program
ICS	Illinois Commodity System	SSO	Seamless Summer Option
IDHS	Illinois Department of Human Services	SY	School Year - July 1 through June 30
IEG	Income Eligibility Guidelines	TANF	Temporary Assistance for Needy Families
ISBE	Illinois State Board of Education	USDA	United States Department of Agriculture
ISBW	Illinois School Breakfast Week	VSR	Verification Summary Report
ILSNA	Illinois School Nutrition Association	WINS	Web-Based Illinois Nutrition System
IWAS	ISBE Web Application Security		

Contact Information

Applications, program requirements and rules:

NUTRITION DIVISION
Illinois State Board of Education
100 N. First St. W-270
Springfield, IL 62777-0001
Phone: (800) 545-7892 or (217) 782-2491
Fax: (217) 524-6124
Email: cnp@isbe.net
Website: <https://www.isbe.net/nutritionandwellness>

USDA Foods and Department of Defense Fresh Fruits and Vegetable Program:

FOOD DISTRIBUTION PROGRAM
Illinois State Board of Education
100 N. First St. W-270
Springfield, IL 62777-0001
Phone: (800) 545-7892 or (217) 782-2491
Fax: (217) 782-4550
Email: cnp@isbe.net
Website: <https://www.isbe.net/FDP>

Claims, claiming system, payments and disbursements:

FUNDING AND DISBURSEMENTS DIVISION
Illinois State Board of Education
100 N. First St. E-320
Springfield, IL 62777-0001
Phone: (217) 782-5256
Fax: (217) 782-3910
Website: <https://www.isbe.net/Pages/Funding-and-Disbursements.aspx>

Websites

Illinois State Board of Education (ISBE), Nutrition Division
<https://www.isbe.net/nutritionandwellness>

USDA/FNS Nutrition Education

- Programmatic
<http://www.fns.usda.gov/fns/nutrition.htm>
- Team Nutrition
<http://www.fns.usda.gov/team-nutrition>
- HealthierUS School Challenge
<http://www.fns.usda.gov/healthierus-school-challenge>



2015-2020 USDA Dietary Guidelines for Americans

<http://www.cnpp.usda.gov/2015-2020-dietary-guidelines-americans>

Institute of Child Nutrition

<http://www.instituteofchildnutrition.org/>

Action for Healthy Kids (AFHK)

<http://www.actionforhealthykids.org>

Illinois School Nutrition Association (ILSNA)

<http://www.ilsna.net>

School Nutrition Association (SNA)

<http://www.schoolnutrition.org>

The Outlook Newsletter

The Outlook newsletter is produced monthly and provides updates, training information, and other useful tips and resources to school nutrition programs staff. Archived copies of the newsletters are available at <https://www.isbe.net/Pages/Nutrition-and-Wellness-Newsletters.aspx>.



To join *The Outlook* newsletter List Serve, email outlook10-join@list.isbe.net and type the email address to be added to the list serve in the body of the email, leaving the *Subject Line* blank. Authorized Representatives and Contact Persons listed on the NSLP WINS sponsor and site questionnaires are automatically added to *The Outlook* list serve.

Timeline for School Nutrition Programs

Monthly	1	<input type="checkbox"/> Read The Outlook newsletter
	1-10	<input type="checkbox"/> Submit Claim for Reimbursement for all months in which a site participates in a meal or milk program
	13-20	<input type="checkbox"/> Make adjustments (if needed) July-March for the following month's USDA Foods deliveries through the Illinois Commodity System <input type="checkbox"/> Check our website for upcoming training opportunities
July		<input type="checkbox"/> Distribute Household Eligibility Applications to families (no earlier than July 1 of each year) <input type="checkbox"/> ISBE releases a public announcement on behalf of all Child Nutrition Program schools. SFAs that wish to release a separate public announcement can use the sample release .
August		<input type="checkbox"/> Process/certify Household Eligibility Applications within ten days of receipt
September		<input type="checkbox"/> Request at least two school food safety inspections this school year from your local county health department <input type="checkbox"/> Continue processing/certifying Household Eligibility Applications within ten days of receipt
October	1	<input type="checkbox"/> Begin the verification process .
	1	<ul style="list-style-type: none"> • October 1 Application Count • Last Operating Day of October Student Count
	31	<input type="checkbox"/> Begin On-Site Reviews of feeding sites (required for multi-site sponsors); to be completed by February 1 <input type="checkbox"/> Celebrate National School Lunch Week <input type="checkbox"/> Carryover pounds at processors must be used by 10/31
November	2 nd week	<input type="checkbox"/> Celebrate American Education Week <input type="checkbox"/> Continue On-Site Reviews of all feeding sites (due Feb. 1) <input type="checkbox"/> If meal services contract is scheduled to expire, check ISBE website for contracting workshops and register <input type="checkbox"/> Complete the verification process (Verification Summary Report due December 15) <input type="checkbox"/> Attend USDA Foods Show to check out processor options

December	15	<input type="checkbox"/> Continue On-Site Reviews of all feeding sites (due Feb. 1) <input type="checkbox"/> <u>Deadline</u> for submitting Verification Summary Report
January	31	<input type="checkbox"/> Continue On-Site Reviews of all feeding sites (due Feb. 1) <input type="checkbox"/> If meal services contract is scheduled to expire, begin preparing your bid solicitation/contract documents for submission to ISBE for review <input type="checkbox"/> Access the Illinois Commodity System to complete the upcoming school year's USDA Foods order; must be completed by January 31
February	1	<input type="checkbox"/> Deadline for completing On-Site Review by sponsor of each site—see <i>Reviews</i> section of the Administrative Handbook <input type="checkbox"/> Deadline for submitting USDA Foods Annual Order for upcoming school year (exact deadline may vary & will be provided via email notification annually) <input type="checkbox"/> Renew meal services contract or school-to-school agreement and send to the Illinois State Board of Education for review
March	4 - 8	<input type="checkbox"/> Ensure at least two school food safety inspections are completed by end of school year <input type="checkbox"/> Ensure all USDA Foods allocated for the previous school year are scheduled for delivery or contact the Food Distribution Program staff. RULE: USDA Foods from the previous school year MAY NOT be stored at Lanter Warehouse over the summer months. <input type="checkbox"/> Celebrate National Nutrition Month ^o <input type="checkbox"/> Celebrate National School Breakfast Week <input type="checkbox"/> Renew meal services contract or school-to-school agreement and send to the Illinois State Board of Education for review
April		<input type="checkbox"/> Submit annual sponsor and site application in the WINS system
May	31	<input type="checkbox"/> Celebrate Child Nutrition Employee Appreciation Week <input type="checkbox"/> DOD Fresh money must be used by the end of your school year <input type="checkbox"/> Annual Sponsor and Site Applications in WINS DUE!
June		<input type="checkbox"/>

Program Participation

The Child Nutrition Programs are federally funded and administered by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS). At the state level, the Illinois State Board of Education (ISBE), Nutrition Division is the administering agency working with schools, community organizations, child care centers, day care homes, and other sponsoring organizations to provide nutritious meals, snacks, and/or milk for children. Reimbursement is paid to sponsoring organizations based on the number of reimbursable meals or milk served to eligible children.

Each Child Nutrition Program is operated under a separate set of regulations, monitoring standards, and record keeping requirements. This section of the handbook will provide general information about all of the available programs.

Participating sponsors must agree to operate programs according to the following regulations:

- Serve meals that meet federal requirements
- Operate a nonprofit food service program
- Offer FREE, REDUCED-PRICE and PAID meals to eligible children
- Do not identify nor discriminate against any eligible child
- Operate food service for all students without regard to race, color, national origin, sex, age, or disability

A variety of Child Nutrition Programs are available to public and private, non-profit (federally tax-exempt) schools; residential child care institutions (RCCIs); day care homes; child care centers; and camps that serve children in grades 12 and below.

School Nutrition Programs

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Special Milk Program (SMP)
- Seamless Summer Option (SSO)
- After-School Snack Program
- Fresh Fruit and Vegetable Program (FFVP)
- Illinois Free Lunch and Breakfast Program
- Food Distribution Program (FDP)
- Department of Defense (DoD) Fresh Fruit and Vegetable Program

Child and Adult Care Food Program

- Day care homes
- Child care centers

Summer Food Service Program

National School Lunch Program

The **National School Lunch Program (NSLP)** is a federally assisted meal program established under the National School Lunch Act that provides nutritionally balanced, low-cost or free lunches to students each school day. It is administered at the federal level by the USDA and at the state level by ISBE.

Who Can Participate in the NSLP?

- Public Schools
- Non-Public School that are non-profit and registered with the ISBE
- RCCI's

Program Requirements

Nutritional Requirements

School lunches must meet meal requirements specific to the age/grade grouping being served. Please visit the ISBE website for detailed [Meal Pattern Information and Nutritional Requirements](#).

Service Requirements

The reimbursable meal must be priced as a unit and available to all children regardless of their ability to pay. Meal service for lunch must be available every school day (attendance day of 5 hours or more) between the hours of 10 a.m. and 2 p.m. with sufficient time for the meal to be served and eaten.

Additional Requirements

Local education agencies (LEAs) participating in the NSLP are required to develop a [Wellness Policy](#) with the objectives of improving the school nutrition environment, promoting student health, and reducing childhood obesity.

The [School Food Service Rules](#) (23 Illinois Administrative Code 305), established requirements for Illinois Free Lunch and Breakfast Program, covers the sale of competitive food in schools, student workers, and government-donated commodities.

Eligible Children

All children enrolled at a participating site may receive a meal through the NSLP. Children from families with incomes at or below 130 percent of the poverty level are eligible for free meals. Those with incomes between 130 and 185 percent of the poverty level are eligible for reduced-price meals, for which students can be charged no more than 40 cents for lunch. Meals are also available at the paid price for all children who do not qualify for free or reduced-price meals.

Local school food authorities (SFAs) set their prices for full-priced meals based on [Paid Lunch Equity \(PLE\)](#) requirements. Food service programs should operate as a non-profit program.

Menu Planning

The USDA requires specific food components be served in required amounts based on the age/grade group being served. The required components include: fluid milk, grains, meat/meat alternates, fruits, and vegetables.

Visit the ISBE website for detailed [Menu Planning](#) information.

Rates of Reimbursement

Sponsors that choose to participate in the NSLP receive cash subsidies and donated USDA Foods for each meal served. Lunches served must meet federal requirements, and FREE and REDUCED-PRICE lunches must be offered to all eligible children. The site is reimbursed for each reimbursable meal served to an eligible child. Reimbursement will not be provided when children take only a portion of the meal, such as just the milk. Reimbursement rates are applied based on the child's eligibility: PAID, REDUCED-PRICE, or FREE. The site is responsible for accurately counting meals served to children daily by eligibility category.

The National School Lunch Act provides two different payment levels for lunches served under the NSLP. This is automatically calculated by the state agency for each SFA. The SFA's approval letter indicates which rate of reimbursement the SFA will receive:

- **Less than 60 percent payment level:** This reimbursement level is used if less than 60 percent of the lunches served by an SFA in the school lunch program during the second preceding school year were served FREE or at a REDUCED-PRICE.
- **Sixty percent or more payment level:** This reimbursement level applies to lunches if 60 percent or more of the lunches served by an SFA during the second preceding school year were served FREE or at a REDUCED-PRICE.

Visit the ISBE website for current [Reimbursement Rates](#).

Record Keeping

At a minimum, SFAs must maintain the following records for three prior years plus the current year, or longer if a review remains open:

- Documentation showing student eligibility for FREE or REDUCED-PRICE meals: Household applications; direct certification list; categorical eligibility listing.
- Meal counting and claiming documentation.
- Documentation of individual child's attendance on a daily basis.
- Menu, recipes, and production records related to the service of a reimbursable meal.

School Breakfast Program

The **School Breakfast Program (SBP)** is a federally assisted meal program that provides nutritionally balanced, low-cost or free breakfasts to children each school day. It is administered at the federal level by the USDA and at the state level by ISBE.

Program Requirements

The SBP operates in the same manner as the NSLP. Sponsors that choose to take part in the SBP receive cash subsidies from the USDA for each meal served. In return, breakfasts served to students must meet federal requirements.

The [Illinois Childhood Hunger Relief Act](#) (Public Act 96-0158) stipulates that all public schools in which at least 40 percent of the students were eligible for FREE or REDUCED-PRICE lunches in the preceding year must operate a breakfast program. Provisions are included in the law to allow a school district to opt out of the breakfast program under certain financial circumstances.

Nutritional Requirements

School breakfasts must meet meal requirements specific to the age/grade grouping being served. Please visit the ISBE website for detailed [Meal Pattern Information and Nutritional Requirements](#).

Service Requirements

Participating schools must serve breakfasts that meet the federal nutrition standards and must provide FREE and REDUCED-PRICE breakfasts to eligible children. Participating schools receive cash assistance from the USDA for each meal served that meets program requirements.

The reimbursable meal must be priced as a unit and available to all children regardless of their ability to pay. Meal service for breakfast must be available every school day near the beginning of the school day with adequate time for the meal to be served and eaten.

Eligible Children

Children at a participating school may receive a meal through the SBP. Children from families with incomes at or below 130 percent of the poverty level are eligible for FREE meals. Those with incomes between 130 and 185 percent of the poverty level are eligible for REDUCED-PRICE meals, for which students can be charged no more than 30 cents for breakfast. Meals are also available at the PAID price for all children who do not qualify for FREE or REDUCED-PRICE meals. All enrolled children are encouraged to participate in the SBP, as the meal is nutritionally balanced and the sponsor will receive reimbursement for all meals served.

Local school food authorities (SFAs) set their own prices for full-priced meals, but must operate their meal services as a non-profit program.

Menu Planning

The USDA requires specific food components be served in required amounts based on the age/grade group being served. The required components include: fluid milk, grains, and fruits.

Visit the ISBE website for detailed [Menu Planning](#) information.

Reimbursement

Sponsors that choose to participate in the SBP receive cash subsidies for each meal served. In return, breakfasts served must meet federal requirements, and FREE and REDUCED-PRICE breakfasts must be offered to all eligible children. The site is reimbursed for each complete meal served to an eligible child. Reimbursement will not be provided when children take only a portion of the meal, such as just the milk. Reimbursement rates are applied based on the child's eligibility: PAID, REDUCED-PRICE, or FREE. The site is responsible for accurately counting meals served to children daily by eligibility category.

Schools set their own prices for breakfast served to students who pay full price (though they must operate their meal services as non-profit programs). No government-donated food entitlement will be offered for breakfasts served; however, government-donated foods received for lunch may be used for breakfast.

Severe Need Reimbursement

An SFA may be eligible for a higher rate of reimbursement for breakfasts served to eligible children in the current school year based on USDA criteria for *severe need*. Severe need reimbursement is for sites serving breakfast to a large percentage of low-income students. To be eligible for Severe Need Breakfast reimbursement, a site must meet the following criteria:

- Forty percent or more of the lunches claimed at the site in the second preceding school year were served FREE or at a REDUCED-PRICE
- The site is participating in or initiating a School Breakfast Program

Sponsors automatically receive the higher rate of reimbursement for each eligible site. Eligibility is shown on the Site Application that is completed annually. Additionally the SFA must maintain documentation of all costs associated with the School Breakfast Program. Funds reimbursed for severe need may only be expended in those sites approved for additional funding.

Visit the ISBE website for current [Reimbursement Rates](#).

Record Keeping

At a minimum, SFAs must maintain the following records for three prior years plus the current year, or longer if a review remains open:

- Documentation showing student eligibility for free or reduced price meals: Household applications; direct certification list; categorical eligibility listing.
- Meal counting and claiming documentation.
- Documentation of individual child's attendance on a daily basis.
- Menu, recipes, and production records related to the service of a reimbursable meal.

Special Milk Program

The **Special Milk Program** (SMP) encourages the consumption of fluid milk by students, at sites or in grades that do not participate in any other Federal meal programs.

Eligible Participants

The Special Milk Program provides reimbursement to participants that offer fluid milk to children that do not have the option to participate in any other federally supported Child Nutrition Programs such as the NSLP and the SBP.

Enrolled children may participate in the Special Milk Program if they attend a:

- School
- Child care institution and are under 19 years of age
- Split-session kindergarten classes or vocational program and are not present during federally supported breakfast or lunch service with access to milk
- Camp

Sponsor Responsibilities

Sponsors must ensure:

- The same types of fluid milk are made available to everyone
- Only 1% and skim unflavored, OR skim flavored milk can be offered
- Claims are made in terms of the number of half-pints served
- The program is operated as a non-profit milk service
- Revenue is used only for the operation or improvement of milk services

Program Options

1. Pricing Option – PAID Milk Only - Household Eligibility Applications are not required.
Students can be charged up to the difference between the program cost (milk + administration) and current reimbursement rate. For instance, if milk costs 25 cents and administration is 5 cents then each of the students would pay 12 cents (30 cents – 18.25 cents or the current reimbursement rate). The program must run as a non-profit program.
2. Non-Pricing Option – PAID Milk Only - Household Eligibility Applications are not required.
It is like the Paid Milk Option in that students can be charged up to the difference between the program cost and current reimbursement rate, but the milk is not “priced” per sale. The students pay a lump sum, such as on a weekly, monthly or annual basis, perhaps included as part of tuition.

3. Pricing Option – with FREE Milk

Household Eligibility Applications are required for students desiring free milk. Milks are “priced” for students who do not meet the eligibility requirements for free milk. Served milks are counted and claimed in the correct categories. The site must ensure that overt identification is not occurring; for example, only collecting money from paid students in the classroom. SFAs set their own prices for paid milk, but must operate as a non-profit program. Paid milks are reimbursed at the current reimbursement rate. For free milks, reimbursement is the average cost per half-pint milk.

Sponsors are required to submit monthly Claims for Reimbursement for milk actually served to children. For the sites participating in a paid option where Household Eligibility Applications are not required, the sites are responsible for taking a point-of-service count of how many milks they provided to students each day. For sites that participate in the free option, they must take a point-of-service count each day that includes how many paid or free milks were provided. Milk served to adults cannot be claimed for reimbursement.

Claims must be made in terms of the number of half-pints (8 ounces) served even if the serving size is more or less than a half-pint. For example, if each student received only 4 ounces of milk, a half-pint of milk would serve two students. Based on this, the school will claim a half-pint of milk per every two students (1 half-pint claimed = 2 students.) There is no rule or regulation setting a minimum or maximum serving size of milk per child. However, the SFA can only be reimbursed for each half-pint of milk served and purchased.

Record Keeping

At a minimum, SFAs must maintain the following records for three prior years plus the current year, or longer if a review remains open:

- Documentation showing student eligibility for free or reduced price meals: Household applications; direct certification list; categorical eligibility listing.
- Meal counting and claiming documentation.
- Documentation of individual child’s attendance on a daily basis.
- Menu, recipes, and production records related to the service of a reimbursable meal.

Visit the ISBE website for current [Reimbursement Rates](#).

Seamless Summer Option

Every school district that has schools where at least 50 percent of the students are eligible for free and reduced-price school meals AND has a summer school program operating during the summer months must provide a summer breakfast and/or lunch program for the students in that community. Two federal programs, the National School Lunch Program’s Seamless Summer Option or the Summer Food Service Program are available to assist in implementing and supplementing the cost of a summer food program.

The **Seamless Summer Option** combines features of the NSLP, SBP, and the Summer Food Service Program (SFSP). This option reduces the paperwork and administrative burden making it easier for schools to feed children from low-income areas during the traditional summer vacation periods, for year-round schools’ breaks, and long school vacation periods (generally exceeding two to three weeks).

Benefits of Program

- Allows children to eat nutritional meals and snacks even when school is not in session.
- It is easy—SFAs continue the same meal service rules and claiming procedures used during the regular school year.
- There is reduced paperwork and monitoring rules to allow a streamlined approach to feeding hungry children in your community.

Participating Sites

The various sites allowed to participate in the Summer Seamless Option include:

- Open sites—All children eat free in communities where at least fifty percent of the children are eligible for free/reduced-price school meals.
- Restricted-open sites—Sites that meet the open-site criteria but are later restricted for safety, control, or security reasons.
- Closed-enrolled sites—May be in any community for an enrolled group of low-income children and meets the fifty percent criteria explained above. This excludes academic summer schools.
- Migrant sites—Serving children of migrant families.
- Camps—Residential or non-residential camps.

School districts participating in the NSLP or SBP are eligible to apply for the Seamless Summer Option. Once approved by ISBE, school districts serve meals free of charge to children 18 years of age and under from low-income areas. Districts may **not** operate this option at schools open only for students attending an academic summer school unless the doors are open to the surrounding community.

The same NSLP and SBP rules apply for the meal service for this option. Meals served are reimbursed at the NSLP and/or SBP “free” rates. Allowable meals may include breakfast, a.m. snack, lunch, p.m. snack, and supper. Up to two types of meals, except lunch and supper, per day can be reimbursed (three for migrant sites and camps).

Afterschool Care Snack Program

Reimbursement is available for children through the age of 18 for snacks served in the **Afterschool Care Snack Program**. The intent of this option is to assist schools in operating organized programs of care that include educational or enrichment activities to help reduce or prevent children's involvement in juvenile crime or other high-risk behavior.

Program Requirements

To be eligible for reimbursement for snacks under the Afterschool Care Snack Program, the program must meet the following requirements:

- Be operated by an SFA that participates in the NSLP. The SFA must retain financial, administrative, and managerial responsibility of the Afterschool Care Snack Program.
- Provide organized, supervised, and structured activities designed with the purpose of caring for children in afterschool settings.
- Include educational or enrichment activities for children.
- Serve all children.
- Operate only after the school day has ended or through 'expanded learning time' as defined by USDA as a school operating longer than the traditional school day for at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the LEA in which the school is located. Snacks cannot be reimbursed in programs operated before or during the child's school day.
- Operate only when school is in session. Snacks are not reimbursable on weekends, holidays, or during school vacations.

The SFA must review each Afterschool Care Snack Program two times per year. The SFA must make the first review during the first four weeks the program is in operation each school year.

Eligible Children

Students are eligible to participate through the age of 18. If a student's 19th birthday occurs during the school year, reimbursement may be claimed for snacks served to that student for the remainder of the school year. Snacks served to individuals, regardless of age, who are mentally or physically disabled and enrolled in the Afterschool Care Program qualify for reimbursement. SFAs that sponsor the Afterschool Care Program can have community programs where participating children do not have to be enrolled as students with the SFA.

Menu Planning Options

Visit the ISBE website for current [Menu Planning](#) options.

Reimbursement

Under this provision, schools may claim reimbursement for one snack per child per day.

There are two methods of reimbursement:

Area-Eligible Sites

At sites served by a school in which at least 50 percent of the enrolled children are eligible for FREE and REDUCED-PRICE meal benefits, all snacks are claimed at the free rate. All children are served free at this site regardless of the individual child's eligibility.

Non-Area Eligible Sites

Sites not served by a school in which at least 50 percent of the enrolled children eligible for FREE and REDUCED-PRICE meal benefits must claim snacks based on the income category (free, reduced-price, or paid) of the enrolled children.

Children cannot be charged for snacks claimed at the free rate of reimbursement. The maximum charge for a reduced-price snack is 15 cents. Sites set their own prices for snacks served to children that pay full price (though they must operate as non-profit program).

Visit the ISBE website for current [Reimbursement Rates](#).

Record Keeping

At a minimum, SFAs must maintain the following records for three prior years plus the current year, or longer if a review remains open:

- If all snacks are claimed free, documentation that the site is located in an area served by a school in which at least 50 percent of the enrolled students are certified eligible for free or reduced-price meals.
- For all other sites, documentation (household applications, Direct Certification, or categorical eligibility) of free and reduced-price eligibility for all children served free or reduced-price snacks that are claimed.
- Meal counts for area eligible sites; AND/OR by category for non-area eligible sites.
- Documentation of individual child's attendance on a daily basis.
- Production records.

Expanded Learning Time

A school operating longer than the traditional school day may be eligible for afterschool snack reimbursement during their school day through the School Nutrition Programs (SNP) or CACFP. Eligibility to participate in an expanded learning time snack would be available to schools that:

- Operate a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located
- Schools that participate in the NSLP
- Schools that offer an afternoon snack, served after lunch, towards the end of the "expanded learning time" school day.

Illinois Free Lunch and Breakfast Programs

Every public school, including special education facilities, must have a free lunch program that provides free lunches (and breakfasts if a school offers breakfast) to students eligible to receive free meals, per 105 ILCS 125/1 and 125/4 and 23 Illinois Administrative Code 305.10. Reimbursement is available to school enrolled in Illinois Free Programs that serve a reimbursable meal to eligible students. Sites participating in the federally-funded NSLP and/or SBP are automatically enrolled in the corresponding Illinois Free Program.

Program Requirements

Nutritional Requirements

School lunches must meet the same meal requirements as the National School Lunch Program.

Additional Requirements

The [School Food Service Rules](#) (23 Illinois Administrative Code 305), established requirements for Illinois Free Lunch and Breakfast Program, covers the sale of competitive food in schools, student workers, and government-donated commodities.

Reimbursement

Schools must serve meals that meet federal requirements (if seeking reimbursement), they must offer free lunches to eligible children, and they must accurately count meals served to free children daily. The school is reimbursed for each complete meal served to an eligible child.

Visit the ISBE website for current [Reimbursement Rates](#).

Eligible Children

- Students must receive free meals if they are eligible to receive Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance for Needy Families (TANF), or if their household income falls within guidelines published annually by the USDA.
- Students eligible for free meals that attend public schools may be listed on the Direct Certification Annual File. The Annual File is available in July of each year, through IWAS. If the household is not listed on the Annual File, eligibility should then be determined by having households complete the Household Eligibility Application.

Food Distribution Programs

The USDA's Food Distribution Program not only supports American agricultural producers by providing cash reimbursements for meals served in schools, but also by providing nutritious, USDA-purchased food to the following nutrition programs:

- National School Lunch Program
- Summer Food Service Program

Donated USDA Foods must be of domestic origin, and nearly 60 percent of the foods purchased for the schools/Child Nutrition Programs must be determined by the USDA to be in surplus at the time of purchase.

National School Lunch Program (NSLP)

Each school year, schools participating in the NSLP are eligible to receive USDA Foods, called "entitlement" foods, at a value set by the USDA for each lunch served. Schools can also get "bonus" commodities as they are available through USDA's price support and surplus removal programs. The USDA does not provide USDA Foods through the School Breakfast Program.

The Food Distribution Division of USDA's Food and Nutrition Service (FNS) coordinates the distribution of commodities to many of the more than 94,000 public and private nonprofit schools that provide meals to students nationwide.

Summer Food Service Program (SFSP)

The Food Distribution Program also distributes USDA Foods to SFSP sites serving needy children during summer vacations from school. These sites include schools, colleges, and universities participating in the National Youth Sports Program; nonprofit summer camps for migrant children; and centers for homeless children.

Types of Foods Available Through the Food Distribution Program

States select a wide variety of USDA Foods, foods available include the following:

- Fruits and Vegetables
- Meats and Poultry
- Flour and Other Grain Products
- Eggs
- Cheese
- Pasta products

Bonus USDA Foods

Bonus foods are considered those over and above entitlement foods and are offered periodically, but only when there are agricultural surpluses. They are then offered to States on a fair-share basis, and do not count against a State's regular entitlement dollars.

Department of Defense (DoD) Fresh Fruit and Vegetable Program

The USDA annually allocates money for Illinois to spend with the Department of Defense Fresh Fruit and Vegetable Program (DoD). The DoD allows participation in the program to all schools that request to participate subject to a \$500 allocation floor.

Fresh Fruit and Vegetable Program (FFVP) and DoD

The Illinois State Board of Education (ISBE) administers the USDA Fresh Fruit and Vegetable Program. More information is available on the [FFVP webpage](#). This USDA program is different from the [Department of Defense \(DoD\) Fresh Fruit and Vegetable Program](#) which is administered through our Food Distribution Program.

FFVP	DoD Fruit and Vegetable Program
Schools must apply each year. Elementary grades only (K-8) and priority is given to schools based on their free and reduced eligibility percentage.	Allows participation in the program to all schools that participate in the National School Lunch Program that request to participate, subject to a \$500 allocation floor.
Fresh fruits and vegetables to be served at least 2 times per week, during the regular school day, but NOT during the National School Lunch Program or School Breakfast Program.	Fruits and vegetables ordered through the USDA Foods FFAVORS electronic system are to be served during the National School Lunch Program.
Provides fresh fruits and vegetables at no cost to all children enrolled in that school, regardless of free/reduced/paid eligibility.	Provides fruits and vegetables as part of the regular reimbursable meal. Meal prices and claiming is based on free/reduced/paid eligibility.

Child and Adult Care Food Program

The Child and Adult Care Food Program (CACFP) is available to non-profit and for-profit, nonresidential child care centers; family day care homes; Head Start centers; and outside-of-school-hours child care programs. The adult care portion of the program is administered by the Department on Aging.

Child Care Centers, Head Start, and School-Sponsored Pre-K Programs

- Provide reimbursement for meals served to children ages 12 and under.
- Sites must be licensed with the Department of Children and Family Services (DCFS) where applicable.
 - School sites are license-exempt when children are three years of age and older.
- If not licensed by DCFS, facilities must complete the DCFS license exemption process and submit their completed DCFS license-exempt form to ISBE. (Public schools are exempt from this requirement.)
- The sponsor must operate an enrolled program with enrollment documentation (collected annually) for all children and Household Income Eligibility applications or eligibility documentation on file for all children claimed in the free or reduced-price category.
- Meals offered to children ages 12 and under must meet the established meal pattern requirements to receive reimbursement.
- Meals for children without a CACFP Annual Enrollment Form on file cannot be claimed. Meals for children not enrolled at the facility cannot be claimed.
- Up to three meal services per child per day can be reimbursed. The combinations are one meal (breakfast, lunch, or supper) and two supplements (snacks), or two meals and one supplement per child per day.

Outside School Hours Program (OSHP)

- Programs are for the care and supervision of children outside of the regular school hours, such as, before and after school, holidays, or during the summer vacation breaks.
- Sites must be licensed with DCFS where applicable.
 - School sites are license-exempt when children are three years of age and older.
 - If not licensed by DCFS, facilities must complete the DCFS license exemption process and submit their completed DCFS license-exempt form to ISBE.
- The program should be organized to provide for all children with regularly scheduled and planned education or enrichment activities in a structured and supervised setting.
- Household Income Eligibility Applications or eligibility documentation must be approved and on file for all children claimed in the free or reduced-price category.
- Meals and/or supplements/snacks must meet CACFP meal pattern requirements by offering all required food items in appropriate portion sizes.

- The program is for children three through 12 years of age; migrant workers' children through 15 years of age; and mentally or physically disabled (as defined by the state) and enrolled at a school serving a majority of persons 18 years of age and younger.
- The program is year-round, even when school is not in session. An OSHP operating only on weekends is not eligible to participate in the CACFP.
- Up to three meal services per child per day can be reimbursed (before and/or after the school day has ended). The combinations are one meal (breakfast, lunch, or supper) and two supplements/snacks or two meals and one supplement/snack per child per day. Meals and supplements are also reimbursable when children are out of school for summer break, vacations, holidays, and weekends.

At-Risk After-School Snack/Supper Program

- Programs are for the care and supervision of children after the school day is over during the regular school year.
- Sites must be located in an area served by a school in which at least 50 percent of the enrolled children are approved eligible for free or reduced-price meals in NSLP.
- Programs may be operated by a public, private non-profit, or private for-profit organization.
- If not licensed by DCFS, facilities must complete the DCFS license exemption process and submit their completed DCFS license-exempt form to ISBE.
- An after-school program:
 - Must be organized to provide all children with regularly scheduled and planned educational or enrichment activities in a structured and supervised setting.
 - Must not restrict or exclude children on the basis of particular skills or interests. Extracurricular programs organized primarily for scholastic, cultural, or athletic purposes, (e.g., honor society, school athletic teams) exclude children based on skills or interests and are not established for the care of children. Thus, these programs do not qualify to participate in the Child and Adult Care Food Program.
 - Programs that include supervised athletic activity along with education or enrichment may participate. For example, a site has an after-school program available to **all** children, and this same school has an honor society meeting and basketball team practicing after school. Even though these two groups restrict participation, they could participate in the At-Risk After-School Snack/Supper Program because the school has a program open to **all** children.
- The snack and/or supper must meet CACFP meal pattern requirements by offering all required food items in the appropriate portion sizes. Children from 6 through 18 years of age should receive the portion stipulated for children 6 through 12 years of age; however, larger portions can be served to all students.
- Programs cannot charge children for the snack/supper.
- Enrollment of students, use of Household Eligibility Applications or eligibility documentation is not required.

- School-age children are eligible to participate through 18 years of age, or 19 if the student's 19th birthday occurs during the school year.
- The At-Risk After-School Snack/Supper Program can operate during the regular school year, but not during the summer when school is not in session. In areas where schools operate on a year-round basis, the after-school program may receive reimbursement for snacks and/or suppers all year for *on-track* children.
- The snack and supper are reimbursed at the free (highest) rate of reimbursement.
- This program can reimburse one snack and one supper served to each child daily after their school day has ended.
 - A snack/supper may also be reimbursed if served at any time of the day on weekends or holidays, including vacation periods, during the regular school year.
 - Programs operating only on weekends during the school year are also allowed to claim a snack/supper.

Emergency Shelters Providing Assistance to Homeless Children

Organizations are eligible to participate if they operate a group meal service in an emergency shelter that provides temporary residence to children and their parents/guardians, or a temporary residential site for children and their parents/guardians sponsored by an emergency shelter.

- The shelter must have the appropriate documentation to verify all health and safety standards and requirements are met.
- Available to children 18 years of age and younger who reside with their parents at the emergency shelter, migrant children 18 years of age and younger, and children with disabilities regardless of their age. Disabled adults are also able to receive meal benefits.
- All meals and supplements/snacks are reimbursed at the free rate.

Day Care Homes

- Provides reimbursement for meals served to children birth through 12 years of age enrolled in a day care home.
- To participate in the CACFP, a day care home provider must sign an agreement with a sponsoring organization before participating and receiving monies for serving nutritious meals in the CACFP.
- Sites must be licensed with the DCFS or license-exempt sites, other than schools, must have a license-exempt status from the Illinois Department of Human Services and must meet State or local health and safety standards.
- Day care home providers are reimbursed by a two-tier reimbursement system.

Summer Food Service Program

The Summer Food Service Program (SFSP) provides nutritious meals to children during the summer months when school is not in session.

- Sponsoring organizations include public or private non-profit local education agencies; entities of state, local, municipal, or county government; residential camps; and private nonprofit organizations with Section 501(c)(3) status from the Internal Revenue Code.
- Program meal patterns must be met in order to claim reimbursement.
- School-age children are eligible to participate through age 18 (or 19 if the student's nineteenth birthday occurs during the school year).
- Sites must be located in an area served by a school in which at least 50 percent of the enrolled children are approved eligible for free or reduced-price meals in the National School Lunch Program.
- Household Eligibility Applications are not required and all meals and/or snacks are claimed as free.

Civil Rights Statement and Requirements

Note: On May 5, 2022, the U.S. Department of Agriculture's Office of Civil Rights released two memos ([CRD01-2022](#) and [CRD02-2022](#)) clarifying the prohibitions against discrimination based on sex in all Food and Nutrition Service programs to prohibit discrimination on the basis of gender identity and sexual orientation. Due to this clarification, the USDA has updated the Nondiscrimination Statement that is required on all documents, websites and training materials that promote the federal Child Nutrition Programs.

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Additional Resources

- [ISBE Civil Rights Website](#)

Civil Rights Statement

USDA Nondiscrimination Statement (updated 2022)

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17Fax2Mail.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **email:**
program.intake@usda.gov

This institution is an equal opportunity provider.

USDA Nondiscrimination Statement (updated 2022) - Spanish

De acuerdo con la ley federal de derechos civiles y las normas y políticas de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta entidad está prohibida de discriminar por motivos de raza, color, origen nacional, sexo (incluyendo identidad de género y orientación sexual), discapacidad, edad, o represalia o retorsión por actividades previas de derechos civiles.

La información sobre el programa puede estar disponible en otros idiomas que no sean el inglés. Las personas con discapacidades que requieren medios alternos de comunicación para obtener la información del programa (por ejemplo, Braille, letra grande, cinta de audio, lenguaje de señas americano (ASL), etc.) deben comunicarse con la agencia local o estatal responsable de administrar el programa o con el Centro TARGET del USDA al (202) 720-2600 (voz y TTY) o comuníquese con el USDA a través del Servicio Federal de Retransmisión al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe llenar un formulario AD-3027, formulario de queja por discriminación en el programa del USDA, el cual puede obtenerse en línea en: <https://www.fns.usda.gov/sites/default/files/resource-files/usda-program-discrimination-complaint-form-spanish.pdf>, de cualquier oficina de USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida a USDA. La carta debe contener el nombre del demandante, la dirección, el número de teléfono y una descripción escrita de la acción discriminatoria alegada con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR) sobre la naturaleza y fecha de una presunta violación de derechos civiles. El formulario AD-3027 completado o la carta debe presentarse a USDA por:

1. **correo:**
U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:**
(833) 256-1665 or (202) 690-7442; or
3. **correo electrónico:**
program.intake@usda.gov

Esta entidad es un proveedor que brinda igualdad de oportunidades.

Civil Rights Requirements

The purpose of this information is to notify Federal School Nutrition Programs participants of the program policies regarding civil rights and provide guidance on nondiscrimination in the administration of these programs.

This information outlines specific responsibilities, requirements, and procedures for federally-assisted programs to ensure federal, state, and local compliance with the provision of Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973.

After each specific responsibility/requirement is identified, suggested ways to meet the responsibility/requirement are listed.

SFA Responsibilities

Data Collection

- Collect and maintain data regarding the target population by racial/ethnic category. Examples include fall housing report, census data, demographic maps, and data provided by child nutrition program participation approval letter.
- Collect and maintain racial/ethnic participation documentation. Methods include staff observation or voluntary self-identification by applicants on the free and reduced-price application forms.
- Maintain all program information for three years plus the current year. Safeguards should be exercised to ensure the data is available only to authorized personnel.

Program Operations

- Denied free and reduced-price applicants should not be disproportionately composed of minority groups.
- Admission procedures should not restrict enrollment of minority persons.
- Program operations should not discriminate against participants based on race, color, national origin, sex, age, or disability. Examples include seating arrangements, serving lines, assignment of eating period, and selection of applications for verification.

Training

- The SFA must provide civil rights training to *front-line staff* on an annual basis.
- *Frontline staff* is defined as those who interact with program applicants or participants and those persons who supervise frontline staff.

- Specific subject matter for training must include: collection and use of data, effective public notification systems, complaint procedures, compliance review techniques, resolution of noncompliance, requirements for reasonable accommodation of persons with disabilities, requirements for language assistance, conflict resolution, and customer service.
- ISBE has developed resources to assist SFAs in meeting these annual training requirements, which are posted on our [website](#).

Public Notification

- Display in a prominent place a USDA poster containing the nondiscrimination statement and the federal procedure for filing a complaint. Posters may be obtained by contacting Nutrition Programs, Illinois State Board of Education at 800.545.7892 or cnp@isbe.net. Poster requests should include: the name of the sponsor, the name of the contact person, the address to send the posters, and the number of posters needed.
- All printed school nutrition program informational materials, such as free and reduced-price meal notification letters and public releases, must include the most recent nondiscrimination statement and complaint procedures.
- The USDA has determined that using the shortened statement (*This institution is an equal opportunity provider*) can only be used in very limited instances. It is based on the intent and/or audience that will be viewing the material. It is recommended that the full statement be used in most cases.
- Provide information in the appropriate translation concerning the availability and nutritional benefits of the school nutrition program, as needed. This requirement can be met through the use of bilingual staff members, volunteers, and/or informational materials in appropriate languages.
- Provide school nutrition program information to the parents and local minority and grassroots organizations upon request; examples include letters, brochures, and public releases.
- Develop and implement a procedure to process civil rights complaints. A civil rights complaint procedure may be developed by the SFA. Persons who believe they have been discriminated against in any USDA-related activity may be advised to write: USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

Menu Planning and Meal Pattern Requirements

Note: Final Rule—[Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#) is effective July 1, 2024. Please note, USDA is gradually phasing in required changes over time and program operators are not required to make any changes to their menus until the 2025-2026 school year, at the earliest. Product-based added sugar limits for milk, yogurt, and cereal take effect July, 1, 2025.

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Additional Resources

- [Updates to the School Nutrition Standards](#) (USDA FNS)
- [Menu Planner for School Meals](#) (USDA FNS)
- See also: *Index of Resources* at the end of this chapter

Introduction

School Food Authorities (SFA) must offer nutritious, well-balanced, and age-appropriate meals to all children they serve to improve their diets and safeguard their health. Federal regulations outlined in 7 CFR 210.10 and 7 CFR 220.8 set forth meal requirements for the National School Lunch Program (NSLP) and School Breakfast Program (SBP), respectively. SFAs must follow a food-based menu planning approach in which meals are provided that meet the required meal components in the specified quantities for each age/grade group served. Meals must also meet dietary specifications for calories, sodium, and saturated fat. In addition, SFAs must keep production and menu records for the meals they produce. This section details menu planning, recordkeeping, and meal pattern requirements.

Menu Recordkeeping

SFAs must maintain records to demonstrate compliance with each program's nutrition requirements, including menu and production records for the meals produced. The following sections detail the various documentation requirements.

Menu

The menu is the core of the meal program and must list all food items offered to students as part of a reimbursable meal. When planning the menu, the menu planner should consider the foods available (including commodities), standardized recipes available, and the food service budget. The following checklist can assist SFAs with menu planning.

Menu Planning Checklist

- Schedule a time to plan and collect menu resources
- Consider previous menus and current meal pattern requirements
- Determine number of days to be planned
- Focus on grade group(s) to be served
- Decide on the number of choices to be offered
- Select the entrée for each day being planned
- Select the other required meal components, keeping in mind the NSLP requirement to plan a variety of vegetables throughout the week
- Ensure at least 2 milk choices are offered
- Make sure the daily and weekly minimum serving sizes are met for each component
- Evaluate success of current and past menus, and make notes for future menus
- Consider marketing ideas, menu themes, school events, and seasonal items

Cycle Menu

A cycle menu that follows meal pattern requirements is highly encouraged. Menu planners can decide on the length of the cycle to be used, which may be a set number of days or weeks. The benefits of using cycle menus include:

- Reducing labor/time involved in planning menus
- Limiting plate waste through use of tried and tested meals
- Reducing food costs by allowing more foods to be ordered in bulk
- Reducing ordering/purchasing time due to repeated use of foods/meals
- Increasing participation through planning of the most popular meals

Additional information on cycle menus can be reviewed in USDA's [Menu Planner for School Meals](#).

Menu Posting Requirement

Schools are required to post a menu(s) near the beginning of the meal service line(s) so students know what foods are offered or can be chosen as part of a reimbursable meal. Menus **do not** need to include foods served only as an à la carte option.

This menu requirement can be satisfied in the form of a written daily or weekly menu, through use of a sample/display tray, or by using menu posters. Visit ISBE's [Menu Board & Signage Resources webpage](#) for printable tools.

Daily Production Records

A daily production record is required for **all meal services** and must contain the following:

- Food components (e.g. grains, meat/meat alternates, fruits, vegetables, and milk) and condiments
- Recipe (noting if a [USDA standardized recipe](#) is used) or food product used. USDA commodity items should be identified with a "C," and a USDA processed commodity, should be identified with a "PC"
- Planned/projected number of student portions and serving sizes for each grade group (e.g. K-5, 6-8, 9-12)
- Planned/projected number of portions and serving sizes for adults
- Total amount of food prepared (e.g. number of servings, pounds, cans, etc.)
- Number of reimbursable meals served (indicated for each grade group)
- Actual number of non-reimbursable meals served (such as to adults or à la carte sales)
- Leftovers and substitutions

Production records may vary in format, but they must accomplish the following:

- Providing staff information regarding foods, recipes, and portion sizes of servings
- Recording actual foods, recipes, and portion sizes served as well as leftovers

Production records must contain all of the required information outlined above. See the next page for an example of a completed production record. To ensure compliance with federal regulations, the following sample forms are available to SFAs:

- [Sample Production Record](#)
- [Sample Production Record with Vegetable Subgroups](#)

Sample Format Production Record

Site: Abraham Lincoln Elementary School
Meal Date: January 29, 2018



Total Projected Reimbursable Lunches 175

Food Item and Form Used	Recipe or Product (Name and Number)	Grade Group	Portion Size* (Number/Weight/Quantity)	Student Projected Servings	Total Projected Servings	Amount of Food Used** (Weight or Quantity)	Student Servings	A la Carte Servings	Adult Servings	Leftovers
							Actual			
<i>Meat/Meat Alternate</i> Chicken Nuggets	PC (List ICS Bulletin number if available)	K-5	4 Each (1.75 oz)	115	130	14 lbs	108		15	1 lb
<i>Vegetable</i> Broccoli & Cauliflower Mix	38	K-5	¾ c	75	115	40 c	69		10	5.5 c
<i>Fruit</i> Orange Slices		K-5	½ c	95	120	48 c	89		13	3.5 c
<i>Grains/Breads</i> Whole-Wheat Roll	Honey Breads	K-5	1 ea	150	175	175 rolls	138		20	17
<i>Other</i> BBQ Sauce	Big Z	K-5	Portion pack/ 1 ea	115	150	150	129		20	1
Low-Fat Ranch Dressing	H.V.		Portion pack/ 1 ea	100	120	120	93		16	11
<i>Milk:</i> Variety		K-5	1 c	145	170	170	110	23	5	7

NOTE: All foods, including condiments and milk, must be included daily.
*Portion size: Must be same as planned. Use separate line if adjusted for age.
**Amount of food used: Based on USDA Food Buying Guide or USDA recipe.

Completing the Sample Production Record

1. Site: Name of the site (school) where the menu is served and/or prepared.
2. Meal Date: Record the date the menu is served and/or prepared.
3. Menu: List the food items that make the meal reimbursable.
4. Food Item and Form Used: The same food items listed on the menu in number three should be described in more detail. For example, peaches would be listed as *sliced in light syrup*; chicken nuggets would be listed as *breaded and baked*. Listing food item and form information is the first step in effectively communicating the menu to the staff. Listing all food items offered, including condiments, is important for future monitoring by the state agency.
5. Recipe or Product (name or number): This accurately identifies a specific recipe or food item to be used. It is critical to specify exact recipes and products. If the preparer or server uses a different recipe or product than indicated by the menu planner, the food provided to students may not necessarily meet the nutrient standard or meal requirements as planned.

Recipe refers to USDA recipes or locally developed recipes. For example, cherry cobbler could be recorded as USDA C-6. Locally developed recipes can be referred to with a number code or by recipe name. The product name and number refer to processed foods. This number would be obtained from the manufacturer such as Prairie Product #1245. A product information sheet should be on file containing the nutrition information of the product. Generic items such as milk, peaches, and pickles do not require a product number because these types of items are available in the USDA-approved software database.
6. Grade Group: List the grade group(s) of the students for which the menu is planned. Grade groupings for lunch are K-5, 6-8, K-8, and 9-12.
7. Portion Size (number, weight, quantity): This information is important to ensure the correct portion size is served as well as planned and prepared. Without this guide on the production sheet, the server may have no way of knowing the correct portion size for the grade group.
8. Student Projected Servings: Projects the number of servings to prepare for student reimbursable meals.
9. Total Projected Servings: This figure includes projected reimbursable student meals, adult meals, and à la carte sales of the food item. The menu planner must also forecast the approximate number of servings needed of each menu item. Projecting the number of servings is the first step in determining how much food to order, how much time to allot for preparation, and which equipment to use.

In menus that offer several different selections with Offer Versus Serve (OVS), it will not be necessary to plan and prepare portions of each menu item for each person. Past production records (that must be kept on file) can help accurately forecast future production and menu planning figures for the required USDA menu planning approach.
10. Amount of Food Used (weight or quantity): Site staff must keep records to verify the planned menu was actually prepared and served. Staff should record this information in a way that is appropriate for the food item: Grains and Meat/Meat Alternates should be in ounces (weight measure); Fruits and Vegetables in cup (volume measure); and Milk in ounce or cup measure.
11. Student Servings: Record the actual number of students served.
12. À La Carte Servings: Record the actual amount of the food item that was sold à la carte.
13. Adult Servings: Record the number of adult meals actually served.
14. Leftovers: Once the meal is served, site staff should record leftovers on the production records. Estimate the quantity/portions or number of servings left over from the recipes. This will assist with any revisions when the menu is served in the future.

Processed Product Information and Nutrition Facts Information

Nutrition Facts Labels

Nutrition Facts	
Serving Size ½ cup (114g) Servings Per Container 4	
Amount Per Serving	
Calories 90	Calories from Fat 30
% Daily Value*	
Total Fat 3g	5%
Saturated Fat 0g	0%
Cholesterol 0mg	0%
Sodium 300mg	13%
Total Carbohydrate 13g	4%
Dietary Fiber 3g	12%
Sugars 3g	
Protein 3g	
Vitamin A 80%	Vitamin C 60%
Calcium 4%	Iron 4%
* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:	
Calories: 2,000 2,500	
Total Fat	Less than 65g 80g
Sat Fat	Less than 20g 25g
Cholesterol	Less than 300mg 300mg
Sodium	Less than 2,400mg 2,400mg
Total Carbohydrate	300g 375g
Dietary Fiber	25g 30g
Calories per gram: Fat 9 • Carbohydrate 4 • Protein 4	

To analyze the nutrient content of a menu, specific nutrient information is required. This information may come in the form of a Nutrition Facts label or a manufacturer's nutrient information sheet. A Nutrition Facts label may be found on the box, can, or package of the food item. For more information on Nutrition Facts labels, visit FDA's [What's on the Nutrition Facts Label](#).

Note: Nutrition Facts labels do not always include the name of the food item or product. If this is the case, the name of the product should be indicated somewhere on the nutrient information. Copy the entire product label including the Nutrition Facts section or write the name of the product on the Nutrition Facts section.

Child Nutrition (CN) Labels

The USDA Child Nutrition (CN) Labeling Program provides food manufacturers the option to include a standardized food crediting statement on their product label. Main dish products that contribute to the meats/meat alternates component of the meal pattern requirements are eligible for a CN label. Additionally, combination main dish items that contain a meat/meat alternate and a grain may include crediting information for both components. Labels must be authorized by USDA Food & Nutrition Service (FNS) prior to use and manufacturers must have quality control procedures and inspection oversight that meet the FNS requirements. The Child Nutrition (CN) Label is the preferred method for verifying the crediting of menu items. In addition, it provides a warranty against audit claims when the product is used according to the manufacturer's instructions. Valid and acceptable documentation for the CN Label is:

- The original CN Label from the product carton; OR
- A photocopy of the CN Label shown attached to the original product carton; OR
- A photograph of the CN Label shown attached to the original product carton.
 - CN Labels that are photocopied or photographed must be visible and legible.
- When using the CN Label Verification Report the best practice is to print and maintain a copy of the page showing the CN product and information.

USDA has published a list of manufacturers that have met the Food and Nutrition Service's Quality Control Program requirements for the CN Labeling Program: [CN Label Verification Report & CN Label Manufacturers Report](#).

Note: CN Labels assist in crediting food items to the meal pattern, but do not include nutrient information. Please ensure all products contain nutrient information **and**, if available, a CN Label. Additional information regarding [CN Labels](#) is provided by USDA.

1 Chicken Stir-Fry Bowl

Ingredient Statement:

2 Chicken, brown rice, broccoli, red peppers, carrots, onions, water, olive oil, soy sauce, spices.

3 CN

Each 4.5 oz Chicken Stir-Fry Bowl provides 1.5 oz eq meat, 1.0 oz eq grains, XXXXXX
CN ¼ cup dark green vegetable, ¼ cup red/orange vegetable, and ⅙ cup other **CN**
vegetable for Child Nutrition Meal Pattern Requirements. (Use of this logo
and statement authorized by the Food and Nutrition Service, USDA XX/XX).
CN

Net Wt.: 18 pounds

4

Chicken Wok Company
1234 Kluck Street • Poultry, PA 1235



1 Product Name

2 Ingredient Statement

3 CN Logo

4 Inspection Legend

CN Label Requirements

It is important to know, the CN Logo (the box with CN on each side that surrounds the meal pattern contribution statement) is one of the four integral parts of a label, which includes the product name, ingredient statement, and inspection legend. All four parts must be on the product carton in order for the CN label to be valid.

Components of a Child Nutrition (CN) Label

During an Administrative Review, if the original CN Label, or a valid photograph or photocopy of the original CN Label is **not** available, program operators may provide an invoice that includes the product name, AND:

- A hard copy of the CN Label copied with a watermark displaying the product name and CN number provided by the vendor; OR
- An electronic copy of the CN Label with a watermark displaying the product name and CN number provided by the vendor; OR
- A hard copy of the CN Label from the CN Label Verification Report

Fact sheets and product labels provide a way for food manufacturers to communicate with program operators about how their products may contribute to the meal pattern requirements for meals served under USDA’s Child Nutrition Programs. Schools are not required to offer processed products with CN Labels; however, it is important to recognize that CN Labeled products ensure that the food provides the stated contribution toward CN meal pattern requirements.

Products purchased to be used in reimbursable meals that do not have a CN Label, should have a completed and signed Product Formulation Statement (PFS) on the manufacturers' letterhead that states how the processed product contributes to the meal pattern requirements (refer to the "Product Formulation Statement (PFS)" section below for additional guidance). If there is no Nutrition Facts panel on the processed product, nutrient information must be obtained from the manufacturer. Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements, therefore, they must keep records of supporting documentation (an original CN Label from the product carton or a signed PFS) provided by the manufacturers. It is the program operator's responsibility to request and verify that the supporting documentation is accurate.

Product Formulation Statements (PFS)

An appropriate Product Formulation Statement (PFS) will provide specific information about the product and show how the credit is obtained citing CN Program Resources and/or Regulations. Consider the following guidance when reviewing a PFS:

- **Review a PFS prior to purchasing processed products.**
 - [Product Formulation Statement Evaluation Tips](#)
 - [Product Formulation Statement Samples](#)
- **Determine that creditable ingredients listed in the PFS match a description in the [Food Buying Guide \(FBG\) for Child Nutrition Programs](#).** If a PFS for a specific product claims to provide a higher credit than what is listed in the FBG, the statement must clarify all crediting ingredients, and demonstrate how the product provides that credit according to FNS regulations, guidance, or policy.
- **Verify that the amount of credit that a product contributes to the meal pattern is not greater than the serving size of the product.** For example, a 2.2 fluid ounce ($\frac{1}{4}$ cup) frozen fruit pop or bar may not credit for more than 2.2 fluid ounces or $\frac{1}{4}$ cup of fruit or fruit juice.
- **Assure that the PFS proves how the claimed credit was obtained.** It is never acceptable for a manufacturer to simply state that the product provides a certain amount of credit for a Child Nutrition meal pattern.

Standardized Recipes

Standardized recipes are required for any menu item that contains 2 or more ingredients. Standardized recipes have been tried, adapted, and retried several times for use by a given food service operation. The benefits of standardized recipes include:

- Consistent food quality
- Predictable yield
- Food cost control
- Customer satisfaction
- Successful completion of Administrative Reviews

If a school is standardizing a recipe, or modifying an existing recipe, detailed records should be kept on file and the following information must be included:

- *Yield*: Include serving size and number of servings
- *All ingredients*: Provide as much information as possible for each ingredient. Include the form (e.g. fresh, frozen, or canned), packing medium (e.g. canned in juice or light syrup, frozen with added sugar, or plain), and fat content (e.g. 20 percent fat ground beef or ground pork, no more than 30 percent fat)
- *Correct measures, weights, and/or package size*
- *Preparation procedures*

Visit the [USDA Recipe Standardization Guide for School Nutrition Programs](#) for detailed steps on developing standardized recipes for use in the USDA's School Nutrition Programs. For ready-to-use USDA standardized recipes, visit the [Child Nutrition Recipe Box](#).

Meal Pattern Requirements

The nutrition standards in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) address today's nutrition concerns for students by aligning school meals with the Dietary Guidelines for Americans. The nutrition standards use a food-based menu planning system that helps increase the availability and intake of fruits, vegetables, whole grains, and fat-free and low-fat milk, as well as reduce saturated fat and sodium intake.

National School Lunch Program (NSLP)

The following are key points of the NSLP meal pattern. More detail is provided on each food component in the sections that follow.

- The NSLP has five food components: 1) grains, 2) meat/meat alternate, 3) fruits, 4) vegetables, and 5) milk
- Quantities of food components are determined based on age/grade groups
- The vegetable component is made up of five vegetable subgroups: 1) dark green, 2) red/orange; 3) beans, peas, and lentils, 4) starchy, and 5) other
- 80% of grains offered throughout the week must be whole grain-rich (WGR)
- Milk must be fat-free (skim) or low-fat (1%) and may be unflavored or flavored
- Dietary specifications are set for calories, sodium, saturated fat, and sugar
- Product-based added sugar limits for milk, yogurt, and cereal take effect July, 1, 2025
- Offer versus serve (OVS) is required for grades 9-12, and optional for grades K-8

Food Components

An NSLP meal has five required food components: 1) grains, 2) meat/meat alternate, 3) fruits, 4) vegetables, and 5) milk. The following sections provide more detail on each of these components.

Grade Groupings

The NSLP meal pattern establishes food quantities based on students' ages, which is commonly referred to as *grade group*. The NSLP meal pattern has 3 grade groups: Kindergarten through 5th grade (K-5), 6th through 8th grade (6-8), and 9th through 12th grade (9-12).

Additionally, school sites that overlap K-5 and 6-8 grade groups, including any or all grades in the K-8 range, have the option of implementing a meal pattern for a combined K-8 grade group. This option allows the same amount of food to be served for all K-8 students, rather than following different serving sizes for the K-5 and 6-8 grade groups. Additional information on the K-8 meal pattern requirements can be found within the tables for each food component section below.

The 9-12 grade group does not overlap the requirements with K-5 and 6-8 grade groups. Therefore, a K-12 school would not be allowed to serve the same amount of food to all students.

National School Lunch Program Meal Pattern

	Grades K-5	Grades 6-8	Grades 9-12
Food Components	Amount of Food ¹ per Week (minimum per day)		
Fruits (cups) ²	2 ½ (½)	2 ½ (½)	5 (1)
Vegetables (cups) ²	3 ¾ (¾)	3 ¾ (¾)	5 (1)
Dark green	½	½	½
Red/orange	¾	¾	1 ¼
Beans, peas, and lentils	½	½	½
Starchy	½	½	½
Other ³	½	½	½
Additional vegetables to reach total ⁴	1	1	1 ½
Grains (oz eq) ⁵	8-9 (1)	8-10 (1)	10-12 (2)
Meats/meat alternates (oz eq) ⁶	8-10 (1)	9-10 (1)	10-12 (2)
Fluid milk (cups) ⁷	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week			
Min-max calories (kcal)	550-650	600-700	750-850
Saturated fat (% of total calories)	<10	<10	<10
Sodium limit through June 30, 2027	≤ 1,110 mg	≤ 1,225 mg	≤ 1,280 mg
Sodium limit beginning July 1, 2027	≤ 935 mg	≤ 1,035 mg	≤ 1,080 mg
Added sugars (% of total calories)— must be implemented by July 1, 2027	<10	<10	<10

¹ Food items included in each group and subgroup and amount equivalents.

² Minimum creditable serving is ⅛ cup. One-quarter cup of dried fruit counts as ½ cup of fruit; 1 cup of leafy greens counts as ½ cup of vegetables. No more than half of the fruit or vegetable offerings may be in the form of juice. All juice must be 100% full-strength.

³ This category consists of “Other vegetables” as defined in paragraph (c)(2)(ii)(E) at 7 CFR 210.10. For the purposes of the NSLP, the “Other vegetables” requirement may be met with any additional amounts of vegetables from the dark green, red/orange, and beans, peas, and lentils subgroups.

⁴ Additional amounts of any vegetable subgroup may be offered to meet the total weekly vegetable requirement.

⁵ Minimum creditable serving is 0.25 oz. eq. At least 80 percent of grains offered weekly must be whole grain-rich as defined in 7 CFR 210.2. Any remaining grain items offered must be enriched.

⁶ Minimum creditable serving is 0.25 oz. eq.

⁷ Minimum creditable serving is 8 fluid ounces. All fluid milk must be fat-free (skim) or low-fat (1 percent fat or less). Milk may be flavored or unflavored, and unflavored milk must be offered at each meal service.

Fruit Component

NSLP Fruit Component				
	K-5	6-8	Combined K-8	9-12
Daily Minimum (cups)	½	½	½	1
Weekly Total (cups)	2 ½	2 ½	2 ½	5

Types of Fruit & Crediting Information

Fruits that are fresh, frozen, dried, canned (packed in water, full-strength juice, or light syrup) and full-strength juice may contribute toward the fruit requirement. All fruits credit toward the fruit component based on their volume as served (e.g. ½ cup of grapes credits as a ½ cup toward the fruit component), except for dried fruits. Dried fruits, such as raisins, credit for twice the amount served. For example, a ¼ cup of dried apricots would credit as a ½ cup serving of fruit.

Juice credits as the amount served (e.g. ½ cup of juice contributes ½ cup toward the fruit component). However, no more than half of the required weekly cups of fruit may come from juice. For K-5, 6-8, and combined K-8 grade groups, no more than 1 ¼ cups of fruit offered weekly may be in the form of juice. For the 9-12 grade group, no more than 2 ½ cups per week may be juice. Schools may plan to serve whole fruits only, juice only, or a combination of both on the same day as long as the total juice planned for the week does not exceed half of the weekly total.

For additional information on crediting fruits, visit USDA's [Crediting Fruits in the Child Nutrition Programs Tip Sheet](#).

Products that Do Not Meet Requirements

The following products do not contribute to the fruit component and may not be credited toward meeting the fruit requirement in any meal served under the Child Nutrition Programs:

- Snack-type foods made from fruits such as fruit strips, fruit drops, or fried banana chips
- Jams and jellies
- Home canned products (for food safety reasons)

Vegetable Component

NSLP Vegetable Component				
	K-5	6-8	Combined K-8	9-12
Daily Minimum (cups)	$\frac{3}{4}$	$\frac{3}{4}$	$\frac{3}{4}$	1
Weekly Total (cups)	$3\frac{3}{4}$	$3\frac{3}{4}$	$3\frac{3}{4}$	5
Dark Green (cups)	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$
Red/Orange (cups)	$\frac{3}{4}$	$\frac{3}{4}$	$\frac{3}{4}$	$1\frac{1}{4}$
Beans, Peas, and Lentils (cups)	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$
Starchy (cups)	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$
Other (cups)	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$	$\frac{1}{2}$
Additional vegetables to meet weekly total (cups)	1	1	1	$1\frac{1}{2}$

Vegetable Subgroups

The vegetable component has five subgroups that must be served each week, including: 1) *Dark Green*, 2) *Red/Orange*, 3) *Beans, Peas, and Lentils*, 4) *Starchy*, and 5) *Other*. See ISBE's [vegetable subgroups chart](#) for examples of vegetables that fall into each subgroup. Schools can choose to serve a given group on one day of the week, such as serving the weekly requirement for dark green vegetables all on Monday. Schools also have the option to serve a variety of vegetables each day, making sure to meet the minimum requirements for each subgroup through multiple smaller servings throughout the week. For example, the K-5 group must have a total of a $\frac{1}{2}$ cup of dark green vegetables for the week, so a school could choose to serve dark green vegetables twice a week, at a $\frac{1}{4}$ cup each time to meet the $\frac{1}{2}$ cup weekly requirement. The minimum amount of any vegetable that can credit towards daily or weekly totals is $\frac{1}{8}$ cup.

Additional Vegetables to Meet Weekly Total

It is important to note the daily vegetable serving requirements are often greater than each of the vegetable subgroup weekly requirements. For example, the 6-8 grade group has a total weekly vegetable requirement of $3\frac{3}{4}$ cups, and a daily minimum requirement of $\frac{3}{4}$ cup. Each week the 6-8 grade group must be served at least a $\frac{1}{2}$ cup of the dark green subgroup, which counts toward the weekly total of $3\frac{3}{4}$ cups. If a school served a $\frac{1}{2}$ cup of dark green vegetables on Monday to meet the dark green vegetable subgroup minimum requirement, they would still need to serve a $\frac{1}{4}$ cup of another vegetable to meet the minimum daily requirement of $\frac{3}{4}$ cup for the 6-8 grade group. This is when the *additional vegetables to meet weekly total* row on the chart above is used.

The *additional vegetables to meet weekly total* is not one of the five vegetable subgroups. When each of the five vegetable subgroup amounts are totaled, they fall short of the required weekly total. For the 6-8 grade group, the required weekly total for the vegetable component is $3\frac{3}{4}$ cups. However, when each of the vegetable subgroup amounts is totaled for this grade group it only equals $2\frac{3}{4}$ cups, which is 1 cup short of the required weekly total.

Returning to the example above of a school that serves the 6-8 grade group and chose Monday to serve the dark green vegetable subgroup, the original amount to be served was a $\frac{1}{2}$ cup. If the school chose to instead serve a $\frac{3}{4}$ cup serving of dark green vegetables for the day, it would satisfy the minimum daily vegetable serving of $\frac{3}{4}$ cup. The minimum weekly requirement of $\frac{1}{2}$ cup of the dark green vegetables is being met along with a $\frac{1}{4}$ cup of *additional vegetables to meet weekly total* being used.

Types of Vegetables and Crediting Information

Vegetables that are fresh, frozen, or canned may credit toward the vegetable component. All vegetables are credited based on their volume as served, except leafy greens and tomato paste and puree. Leafy greens only credit for half of the amount served. For example, 1 cup of Romaine lettuce would only credit as a $\frac{1}{2}$ cup serving of vegetables. Tomato paste and puree are credited based on calculated volume of the whole food equivalency. More information can be found in USDA's [Food Buying Guide](#).

Full-strength 100% vegetable juice is allowed to be served and is held to the same requirements as fruit juice. Juice credits as the amount served, and no more than half of the weekly total vegetables may come from juice.

Pasta products made from 100% vegetable flours may also credit towards the vegetable component in the School Nutrition Programs. Review USDA memo [SP 26-2019](#) for requirements that must be met when crediting these types of products.

Mixed vegetable dishes, such as a vegetable medley, that contain multiple vegetables can count toward the daily minimum and weekly total vegetable requirements. However, they may or may not credit toward meeting any of the five vegetable subgroup requirements. The following examples provide clarification on how to credit mixed vegetable dishes.

Under the 6-8 grade group requirements, a $\frac{3}{4}$ cup serving of a vegetable medley meets the daily minimum vegetable requirement. However, if none of the vegetables in the medley are equal to or greater than a $\frac{1}{8}$ cup, the dish would not credit toward any of the vegetable subgroup requirements. The vegetable medley would then contribute to the *additional vegetables to meet weekly total*.

To allow mixed vegetable dishes to credit toward any of the vegetable subgroups, schools should 1) choose products with a CN label that shows the creditable amounts of vegetables, or 2) have a standardized recipe that would substantiate the specific vegetables in a mixed vegetable dish as being provided in an amount of $\frac{1}{8}$ cup or greater. Any vegetable present in an amount less than $\frac{1}{8}$ cup cannot be credited toward a given vegetable subgroup.

For additional information on crediting vegetables, visit USDA's [Crediting Vegetables in the Child Nutrition Programs Tip Sheet](#).

Salad Bars

Salad bars can be an effective way to increase student access to and consumption of vegetables (and fruits). They can also help to reduce plate waste by allowing students to take only items they will eat. There are several considerations SFAs should consider when implementing a salad bar in their food service, such as portion sizes, ensuring a meal is reimbursable, production and menu records, and food safety. USDA's [Handling Fresh Produce on Salad Bars](#) webpage and USDA memo [SP 41-2019](#) provides guidance on salad bars in the NSLP and SBP.

Products that Do Not Meet Requirements

The following products do not contribute to the vegetable component in any meal served under the Child Nutrition Programs:

- snack-type foods made from vegetables such as potato chips, or banana chips
- pickle relish, jam, or jelly
- tomato catsup and chili sauce; (tomato paste in chili can be creditable)
- home canned products (for food safety reasons)
- dehydrated vegetables used for seasoning

Grains Component

NSLP Grains Component				
	K-5	6-8	Combined K-8	9-12
Daily Minimum (ounce equivalents)	1	1	1	2
Weekly Minimum (ounce equivalents)	8	8	8	10
Weekly Maximum* (ounce equivalents)	9	10	9	12

*The weekly maximum may be exceeded as long as weekly calories, sodium, saturated fat, and sugar limits are not exceeded.

In the NSLP, 80% of grains served throughout the week must be *whole grain-rich* (WGR), and any remaining grains must be *enriched*. These terms are defined in the sections that follow.

Whole Grain-Rich

Whole grain-rich (WGR) is a term that is specific to the USDA's Child Nutrition Programs. WGR differs from the commonly used term *whole grain* (see *Whole Grains* section below for more information). A product is considered WGR if it contains 100% whole grains, or a blend of whole grains and enriched grains of which at least 50% is whole grain and any remaining grains in the product are enriched. USDA's [Whole Grain Resource for the National School Lunch and Breakfast Programs](#) provides more detail on WGR requirements.

Whole Grains

Whole grain refers to a grain that contains all of its original parts (i.e. the bran, germ, and endosperm). Whole grains contain naturally occurring nutrients and are a good source of fiber.

Examples of whole grains include, but is not limited to:

- Amaranth
- Bromated whole wheat flour
- Brown rice
- Buckwheat
- Bulgar (cracked wheat)
- Crushed wheat
- Graham flour
- Millet
- Oatmeal or rolled oats
- Quinoa
- Triticale
- Wild rice
- Whole cornmeal
- Whole durum wheat
- Whole grain barley
- Whole grain corn
- Whole grain sorghum
- Whole grain triticale
- Whole rye
- Whole wheat

Enriched Grains

Enriched grains refer to grain products in which nutrients are added back into the product after removing the bran and germ. However, nutrients are not added back in the same proportions they are removed. Some examples of enriched grains that could be found on a product's ingredient list include, but are not limited to: enriched flour, enriched wheat flour, and enriched corn meal.

Crediting Information

All grain products served in the NSLP must be credited based on per-ounce equivalent (oz eq) standards. For example, 16 grams of creditable grain ingredients provide 1 oz eq credit for breads; 28 grams (approximately 1.0 ounce by weight) of dry product or ½ cup cooked product provides 1 oz eq credit for brown rice and pasta. When crediting grain products, grains round down to the nearest 0.25 oz eq. The minimum amount of grain creditable towards meal pattern requirements is 0.25 oz eq.

Program operators have the ability to credit ounce equivalencies for grain products based on the ounce weights listed in USDA's [Exhibit A: Grain Requirements for Child Nutrition Programs](#) (see *Exhibit A—Criteria for Determining Minimum Serving Sizes* section), or by the grams of creditable grain in each product portion (documented by a standardized recipe, CN label, or PFS).

Nutrition Facts	
Serving Size 1 bun (53g)	
Amount Per Serving	
Calories 140	Calories from Fat 25
% Daily Values*	
Total Fat 3g	5%
Saturated Fat 1g	5%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 260mg	11%
Total Carbohydrate 25g	8%
Dietary Fiber 1g	4%
Sugars 2g	
Protein 6g	
Vitamin A -	● Vitamin C -
Calcium 4%	● Iron 15%

* Percent Daily Values are based on a 2000 calorie diet. Your daily values may be higher or lower depending on your calorie needs.

The following example details how to calculate ounce equivalencies using Exhibit A using the Nutrition Facts label pictured for a 100% whole grain bun (**note: products credit differently depending on the amount of whole grains present**):

1. Determine the serving size per the package label. According to this Nutrition Facts label, one bun is 53 grams.
2. Review USDA's Exhibit A tool for information on how to credit the product. According to Exhibit A, buns fall under Group B in which 1 oz eq is equivalent to 28 grams.
3. Calculate the grain product's ounce equivalency:
 - 53 grams / 28 grams = 1.89 oz eq
 - 1.89 oz eq rounds down to 1.75 oz eq
 - **1 bun credits as 1.75 oz eq**

USDA’s [Crediting Grains in the Child Nutrition Programs Tip Sheets](#) and [Exhibit A Grains Tool](#) can assist SFA’s with crediting grain products.

Exhibit A--Criteria for Determining Minimum Serving Sizes

USDA’s [Exhibit A: Grain Requirements for Child Nutrition Programs](#) is divided into nine groups. The required weight for each group is based on the key nutrients in one slice of bread (25 grams or 0.9 ounce) or an equal amount (14.75 grams) of enriched or whole-grain meal and/or flour. Within each group, all grain items have approximately the same nutrient and grain content in each serving. Items with fillings, toppings, etc. require larger serving sizes to meet the minimum grain content.

Exhibit A: Grain Requirements for Child Nutrition Programs^{1, 2}

Color Key: [Footnote 5 = Blue](#), [Footnote 3 or 4 = Red](#)

Group A	Ounce Equivalent (oz eq) for Group A	Minimum Serving Size for Group A
Bread type coating Bread sticks (hard) Chow Mein noodles Savory Crackers (saltines and snack crackers) Croutons Pretzels (hard) Stuffing (dry) <i>Note: weights apply to bread in stuffing</i>	1 oz eq = 22 gm or 0.8 oz 3/4 oz eq = 17 gm or 0.6 oz 1/2 oz eq = 11 gm or 0.4 oz 1/4 oz eq = 6 gm or 0.2 oz	1 serving = 20 gm or 0.7 oz 3/4 serving = 15 gm or 0.5 oz 1/2 serving = 10 gm or 0.4 oz 1/4 serving = 5 gm or 0.2 oz
Group B	Ounce Equivalent (oz eq) for Group B	Minimum Serving Size for Group B
Bagels Batter type coating Biscuits Breads - all (for example sliced, French, Italian) Buns (hamburger and hot dog) Sweet Crackers⁵ (graham crackers - all shapes, animal crackers) Egg roll skins English muffins Pita bread Pizza crust Pretzels (soft) Rolls Tortillas Tortilla chips Taco shells	1 oz eq = 28 gm or 1.0 oz 3/4 oz eq = 21 gm or 0.75 oz 1/2 oz eq = 14 gm or 0.5 oz 1/4 oz eq = 7 gm or 0.25	1 serving = 25 gm or 0.9 oz 3/4 serving = 19 gm or 0.7 oz 1/2 serving = 13 gm or 0.5 oz 1/4 serving = 6 gm or 0.2 oz
Group C	Ounce Equivalent (oz eq) for Group C	Minimum Serving Size for Group C
Cookies³ (plain - includes vanilla wafers) Cornbread Corn muffins Croissants Pancakes Pie crust (dessert pies³, cobbler³, fruit turnovers⁴, and meats/meat alternate pies) Waffles	1 oz eq = 34 gm or 1.2 oz 3/4 oz eq = 26 gm or 0.9 oz 1/2 oz eq = 17 gm or 0.6 oz 1/4 oz eq = 9 gm or 0.3 oz	1 serving = 31 gm or 1.1 oz 3/4 serving = 23 gm or 0.8 oz 1/2 serving = 16 gm or 0.6 oz 1/4 serving = 8 gm or 0.3 oz

Group D	Ounce Equivalent (oz eq) for Group D	Minimum Serving Size for Group D
Doughnuts ⁴ (cake and yeast raised, unfrosted) Cereal bars, breakfast bars, granola bars ⁴ (plain) Muffins (all, except corn) Sweet roll ⁴ (unfrosted) Toaster pastry ⁴ (unfrosted)	1 oz eq = 55 gm or 2.0 oz 3/4 oz eq = 42 gm or 1.5 oz 1/2 oz eq = 28 gm or 1.0 oz 1/4 oz eq = 14 gm or 0.5 oz	1 serving = 50 gm or 1.8 oz 3/4 serving = 38 gm or 1.3 oz 1/2 serving = 25 gm or 0.9 oz 1/4 serving = 13 gm or 0.5 oz

- ¹ In the NSLP, SBP (grades K–12), and NSLP afterschool snacks (effective July 1, 2025), at least 80 percent of the weekly grains offered must meet the whole grain-rich criteria and the remaining grain items offered must be made from whole-grain flour, whole-grain meal, corn masa, masa harina, hominy, enriched flour, enriched meal, bran, germ, or be an enriched product, such as enriched bread, or a fortified cereal. Please note: State agencies have the discretion to set stricter requirements than the minimum nutrition standards for school meals. For additional guidance, please contact your State agency. For all other Child Nutrition Programs, grains must be made from whole-grain flour, whole-grain meal, corn masa, masa harina, hominy, enriched flour, enriched meal, bran, germ, or be an enriched product, such as enriched bread, or a fortified cereal. Under the CACFP child and adult meal patterns and in the NSLP/SBP preschool meals, at least one grain serving per day must meet the whole grain-rich criteria.
- ² For the NSLP, SBP (grades K–12), NSLP afterschool snacks, and CACFP, and NSLP/SBP infant and preschool meals grain quantities are determined using ounce equivalents (oz eq). SFSP may determine grain quantities using grains/breads servings. Some of the following grain items may contain more sugar, salt, and/or fat than others. This should be a consideration when deciding how often to serve them.
- ³ Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K–12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count toward the grains component in CACFP or NSLP afterschool snacks (effective July 1, 2025), or NLSP/SBP infant and preschool meals as specified in §§226.20(a)(4) and 210.10.
- ⁴ Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week for grades K–12) as specified in §210.10. May count toward the grains component in SBP (grades K–12) and at snack and breakfast meals in SFSP. Considered a grain-based dessert and cannot count toward the grains component in the CACFP, NSLP afterschool snacks (effective July 1, 2025), or NSLP/SBP infant and preschool meals as specified in §§226.20(a)(4) and 210.10.
- ⁵ Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K–12) as specified in §210.10. May count toward the grains component in the SBP (grades K–12), NSLP afterschool snacks, CACFP, NSLP/SBP infant and preschool meals, and SFSP.

Group E	Ounce Equivalent (oz eq) for Group E	Minimum Serving Size for Group E
Cereal bars, breakfast bars, granola bars ⁴ (with nuts, dried fruit, and/or chocolate pieces) Cookies ³ (with nuts, raisins, chocolate pieces and/or fruit purees) Doughnuts ⁴ (cake and yeast raised, frosted or glazed) French toast Sweet rolls ⁴ (frosted) Toaster pastry ⁴ (frosted)	1 oz eq = 69 gm or 2.4 oz 3/4 oz eq = 52 gm or 1.8 oz 1/2 oz eq = 35 gm or 1.2 oz 1/4 oz eq = 18 gm or 0.6 oz	1 serving = 63 gm or 2.2 oz 3/4 serving = 47 gm or 1.7 oz 1/2 serving = 31 gm or 1.1 oz 1/4 serving = 16 gm or 0.6 oz
Group F	Ounce Equivalent (oz eq) for Group F	Minimum Serving Size for Group F
Cake ³ (plain, unfrosted) Coffee cake ⁴	1 oz eq = 82 gm or 2.9 oz 3/4 oz eq = 62 gm or 2.2 oz 1/2 oz eq = 41 gm or 1.5 oz 1/4 oz eq = 21 gm or 0.7 oz	1 serving = 75 gm or 2.7 oz 3/4 serving = 56 gm or 2 oz 1/2 serving = 38 gm or 1.3 oz 1/4 serving = 19 gm or 0.7 oz
Group G	Ounce Equivalent (oz eq) for Group G	Minimum Serving Size for Group G
Brownies ³ (plain) Cake ³ (all varieties, frosted)	1 oz eq = 125 gm or 4.4 oz 3/4 oz eq = 94 gm or 3.3 oz 1/2 oz eq = 63 gm or 2.2 oz 1/4 oz eq = 32 gm or 1.1 oz	1 serving = 115 gm or 4 oz 3/4 serving = 86 gm or 3 oz 1/2 serving = 58 gm or 2 oz 1/4 serving = 29 gm or 1 oz

Group H	Ounce Equivalent (oz eq) for Group H	Minimum Serving Size for Group H
Cereal Grains (barley, quinoa, etc.) Breakfast cereals (cooked) ^{6,7} Bulgur or cracked wheat Macaroni (all shapes) Noodles (all varieties) Pasta (all shapes) Ravioli (noodle only) Rice	1 oz eq = 1/2 cup cooked or 1 ounce (28 gm) dry	1 serving = 1/2 cup cooked or 25 gm dry
Group I	Ounce Equivalent (oz eq) for Group I	Minimum Serving Size for Group I
Ready to eat breakfast cereal (cold, dry) ^{6,7,8,9}	1 oz eq = 1 cup or 1 ounce for flakes and rounds 1 oz eq = 1.25 cups or 1 ounce for puffed cereal 1 oz eq = 1/4 cup or 1 ounce for granola	1 serving = 3/4 cup or 1 oz, whichever is less

³ Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week in grades K–12) as specified in §210.10 and at snack service in SFSP. Considered a grain-based dessert and cannot count toward the grain component in CACFP, NSLP afterschool snacks (effective July 1, 2025), or NSLP/SBP infant and preschool meals as specified in §§226.20(a)(4) and 210.10.

⁴ Allowed in NSLP (up to 2.0 oz eq grain-based dessert per week for grades K–12) as specified in §210.10. May count toward the grains component in SBP (grades K–12) and at snack and breakfast meals in SFSP. Considered a grain-based dessert and cannot count toward the grains component in the CACFP, NSLP afterschool snacks (effective July 1, 2025), or NSLP/SBP infant and preschool meals as specified in §§226.20(a)(4) and 210.10.

⁶ Refer to program regulations for the appropriate serving size for supplements served to children aged 1 through 5 in the NSLP; breakfast served in the SBP, and meals served to children ages 1 through 5 and adult participants in the CACFP. Breakfast cereals are traditionally served as a breakfast menu item but may be served in meals other than breakfast.

⁷ In the NSLP and SBP, cereals that list a whole grain as the first ingredient must be fortified. If the cereal is 100 percent whole grain, fortification is not required. For all Child Nutrition Programs, cereals must be whole-grain, enriched, or fortified.

⁸ Effective July 1, 2025, cereals served in NSLP, SBP, and NSLP afterschool snacks must contain no more than 6 grams of added sugars per dry ounce.

⁹ Effective October 1, 2025, cereals served in CACFP and NSLP/SBP infant and preschool meals must contain no more than 6 grams of added sugars per dry ounce. Prior to October 1, 2025, breakfast cereals served in the CACFP must contain no more than 6 grams of total sugars per dry ounce.

Determining Equivalent Minimum Serving Sizes in Recipes

Exhibit A lists equivalent, minimum serving sizes for a wide variety of grain products. In lieu of using the minimum serving sizes listed in the chart, the contribution of a recipe may be calculated to determine the amount of grain servings the recipe provides. The crediting of a food item as a grain serving is determined by the total amount of enriched or whole-grain meal and/or flour in the recipe divided by the number of servings the recipe yields. The amount of enriched or whole-grain meal and/or flour contained in each serving is then divided by 14.75 grams.

Determining if a Product Meets WGR Criteria

The following list provides criteria for determining if a grain product is considered WGR in the NSLP. All products must meet the first criterion below, and at least one the criterion that follow.

1. The food item must meet the oz eq requirements for the grains component as defined in [SP 30-2012](#) and the Exhibit A tool.

AND

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

OR

3. The product includes one of the following FDA-approved whole grain health claims on its packaging:

- “Diets rich in whole grain foods and other plant foods, and low in total fat, saturated fat, and cholesterol, may reduce the risk of heart disease and certain cancers.”
- “Diets rich in whole grain foods and other plant foods, and low in saturated fat and cholesterol, may help reduce the risk of heart disease.”

OR

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

- Non-mixed dishes (e.g., breads, cereals): Whole grains are the primary ingredient by weight (a whole grain is first on the ingredient list with an exception for water). Products in which whole grain content comes from multiple ingredients can meet the whole grain-rich criteria when all whole grains combined are the primary ingredient by weight. Proper documentation from the manufacturer or a standardized recipe is required.
- Mixed dishes (e.g., pizza, corn dogs): Whole grains are the primary grain ingredient by weight (a whole grain is the first grain ingredient in the list of grains). For recipes, the weights of grain ingredients are used to determine whether the total weight of whole grains is greater than or equal to the total weight of grains that are not whole grain. Proper documentation from the manufacturer or a standardized recipe is required.

USDA’s [Does My Product Meet the Whole Grain-Rich Criteria?](#) tool can assist SFAs in determining if a product is acceptable.

Grain-Based Desserts

Grain-based desserts are allowed to be served by SFAs and credit towards the grain component. However, the amount served must not exceed 2 oz eq per week in the NSLP. *Grain-based desserts* count toward the required weekly total for grains. [Exhibit A](#) notes grain-based desserts that are acceptable in the NSLP.

Grains that Do Not Meet Requirements

The following grain ingredients are not creditable towards the grain component in the NSLP and must be present at a level of less than 2% of the product formula:

- Bran
- Corn fiber
- Corn starch
- Germ
- Modified food starch (e.g. potato, legume, and other vegetable flours)
- Oat fiber
- Wheat starch

Record Keeping Requirement

Whole grain (WG) or whole grain-rich (WGR) must be written on menus next to the grain item. Proper documentation, such as a Child Nutrition (CN) label or a product formulation statement (PFS) must be on file to demonstrate that whole grains are the primary ingredient by weight for WGR items.

Meat/Meat Alternate Component

NSLP Meat/Meat Alternate Component				
	K-5	6-8	Combined K-8	9-12
Daily Minimum (ounce equivalents)	1	1	1	2
Weekly Minimum (ounce equivalents)	8	9	9	10
Weekly Maximum* (ounce equivalents)	10	10	10	12

*The weekly maximum may be exceeded as long as weekly calories, sodium, saturated fat, and sugar limits are not exceeded.

Types of Meat/Meat Alternate and Crediting Information

In the NSLP, the meat/meat alternate (M/MA) component must be served in a main dish, or in a main dish and only one other food item. Like the grains component, M/MA items are credited based on per-ounce equivalent (oz eq) standards. The minimum amount of M/MA creditable towards meal pattern requirements is 0.25 oz eq, and operators must round down to the nearest 0.25 oz eq when crediting M/MA products. SFAs should refer to the [Food Buying Guide](#) when determining how to credit certain M/MA products. Examples of foods that may credit toward the M/MA component include, but are not limited to:

- Beef
- Poultry
- Fish
- Tofu and soy products
- Beans, peas, and lentils
- Cheese
- Eggs
- Nuts and seeds
- Nut and seed butters
- Yogurt
- Dried and semi-dried meat

Examples of common one-ounce equivalents include:

- 1 oz cheese
- 2 TBSP nut butters
- 1 oz nuts and seeds
- ½ ea large egg
- ¼ cup beans/peas
- 2 oz cottage cheese
- 4 oz yogurt
- 1 oz cooked, boneless meat, poultry, and fish

Beans, Peas, and Lentils

Beginning July 1, 2024: schools may count beans, peas, and lentils offered as meat/meat alternates at lunch toward the weekly beans, peas, and lentils vegetable subgroup requirement. When offering beans, peas, and lentils as meats/meat alternates, schools may only count those items toward one meal component daily: either the meat/meats alternate component or the vegetables component. When offering beans, peas, and lentils as meat alternates, additional vegetables must still be offered to meet the daily and weekly vegetable meal component requirements.

Tofu and Soy Products

For purposes of the School Nutrition Programs, tofu is defined as a soybean-derived food, made by a process in which soybeans are soaked, ground, mixed with water, heated, filtered, coagulated, and formed into cakes. Basic ingredients are whole soybeans, one or more food-grade coagulants (typically a salt or an acid), and water. Commercial tofu and soy products may be used to meet all or part of the M/MA component, but must conform to FNS guidance. Review USDA memo [SP 02-2024](#) for information on crediting tofu and soy yogurt products in the School Nutrition Programs and [SP 25-2019](#) for how to credit tempeh. Noncommercial and/or non-standardized tofu and soy products are not creditable in the NSLP.

Nuts and Seeds

Nuts and seeds as well as nut and seed butters are allowed as meat alternates in the School Nutrition Programs. As of July 1, 2024, nuts and seeds may credit for 100% of the meat/meat alternate component in a meal. Acorns, chestnuts, and coconuts may not be used because of their low protein and iron content.

Milk Component

NSLP Milk Component				
	K-5	6-8	Combined K-8	9-12
Daily Minimum (cups)	1	1	1	1
Weekly Total (cups)	5	5	5	5

Types of Milk and Requirements

All milk provided in the NSLP must be fat-free (skim) or low-fat (1%), and may be unflavored or flavored. SFAs must offer at least two varieties of fluid milk during the meal service, and one of those options must be unflavored.

Fluid milk substitutions are among the most common dietary accommodation requests in the School Nutrition Programs. When accommodating such requests, SFAs must ensure milk substitutions meet USDA nutrient requirements. Refer to the [Dietary Accommodations](#) section of the handbook for additional information.

Dietary Specifications

NSLP Dietary Specifications				
	K-5	6-8	Combined K-8	9-12
Calories (kcal)	550-650	600-700	600-650	750-850
Saturated Fat (% of total calories)	<10	<10	<10	<10
Sodium limit through June 30, 2027	≤ 1,110 mg	≤ 1,225 mg	≤ 1,110 mg	≤ 1,280 mg
Sodium limit beginning July 1, 2027	≤ 935 mg	≤ 1,035 mg	≤ 935 mg	≤ 1,080 mg
Added sugars (% of total calories)— must be implemented by July 1, 2027	<10	<10	<10	<10

The standards for calories, sodium, saturated fat, and sugar are based on averages for the school week. Throughout the week, one or more days may fall outside of the required calorie range, or above the sodium, saturated fat, and sugar limits. However, other days during that week must balance out those averages so that meals fall within the above requirements.

Product-Based Added Sugar Limits

Limits on specific high-sugar products, including milk, yogurt, and cereal, go into effect July 1, 2025. Breakfast cereals may have no more than 6 grams of added sugars per dry ounce. Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce). Flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces, or for flavored milk sold as a competitive food for middle and high schools, 15 grams of added sugars per 12 fluid ounces.

Nutrition Facts	
8 servings per container	
Serving size 8 fl oz (240mL)	
Amount per serving	
Calories 110	
<small>% Daily Value*</small>	
Total Fat 0g	0%
Saturated Fat 0g	0%
Trans Fat 0g	
Cholesterol 0mg	0%
Sodium 5mg	0%
Total Carbohydrate 27g	10%
Dietary Fiber 0g	0%
Total Sugars 23g	
Includes 23g Added Sugars	46%
Protein 0g	
Vitamin D 0mcg	0%
Calcium 0mg	0%
Iron 0mg	0%
Potassium 40mg	0%
<small>* The % Daily Value (DV) tells you how much a nutrient in a serving of food contributes to a daily diet. 2,000 calories a day is used for general nutrition advice.</small>	

The amount of added sugars in a product can be found by reviewing the Nutrition Facts label (pictured). Added sugars are different than total sugars. Total sugars include both naturally occurring sugars and added sugars.

Offer Versus Serve

In the NSLP, students must be offered all five meal pattern components (i.e. grains, M/MA, fruits, vegetables, and milk). Under *offer versus serve* (OVS), students are allowed to decline up to two meal components. However, at least three components must be selected, and at least a ½ cup of fruit and/or vegetable must be selected for the meal to be reimbursable.

The 9-12 grade group must participate in OVS during lunch. OVS participation for grades K-8 is optional. Grades K-8 that do not participate in OVS are considered *serve only*, in which students are provided all five meal pattern components and no components are able to be declined.

Once a student has selected at least three components in the required serving sizes (one of which is a ½ cup of fruit and/or vegetable), schools can allow or encourage tasting/partial servings of the remaining components. This may be especially effective when introducing new foods or when working with younger students who may not be as comfortable when trying new foods.

Regardless of whether a student chooses 3, 4 or all 5 components under OVS, meals are priced as a unit. This means students who pay full price or reduced price for meals continue to pay the same price that they normally would for a meal.

Additional OVS guidance can be reviewed in USDA’s [Offer Versus Serve: Guidance for the National School Lunch Program and the School Breakfast Program](#).

School Breakfast Program (SBP)

The following are key points of the SBP meal pattern. More detail is provided on each food component in the sections that follow.

- The SBP has three food components: 1) grains, 2) fruits, and 3) milk
- Quantities of food components are determined based on age/grade groups
- 80% of grains offered throughout the week must be whole grain-rich (WGR)
- Milk must be fat-free (skim) or low-fat (1%) and may be unflavored or flavored
- Including items from the meat/meat alternate and vegetable components are optional and provide menu planners with additional flexibility at breakfast
- Dietary specifications are set for calories, sodium, saturated fat, and sugar
- Product-based added sugar limits for milk, yogurt, and cereal take effect July, 1, 2025
- Offer versus serve (OVS) is optional for all grade groups

Food Components

An SBP meal has three required food components: 1) grains, 2) fruits, and 3) milk. Additional menu planning flexibilities at breakfast may include vegetables and meat/meat alternates. The following sections provide more detail on each of these components.

Grade Groupings

Like the NSLP, the SBP meal pattern has 3 grade groups: Kindergarten through 5th grade (K-5), 6th through 8th grade (6-8), and 9th through 12th grade (9-12).

Additionally, school sites that include grades K-5 and 6-8 have the option of following a combined meal pattern for the K-8 grade group. Schools that include grades K-12 can choose to implement one meal pattern for the K-12 grade group, rather than following separate meal patterns for all 3 grade groups. Additional information on the K-12 meal pattern requirements can be found within the tables for each food component section below.

School Breakfast Program Meal Pattern

	Grades K-5	Grades 6-8	Grades 9-12
Food Components	Amount of Food ^a per Week (minimum per day)		
Fruits (cups) ^b	5 (1)	5 (1)	5 (1)
Vegetables (cups) ^b	0	0	0
Dark green	0	0	0
Red/orange	0	0	0
Beans, peas, and lentils	0	0	0
Starchy	0	0	0
Other	0	0	0
Grains or Meat/meat alternates (oz eq) ^c	7-10 (1)	8-10 (1)	9-10 (1)
Fluid milk ^d (cups)	5 (1)	5 (1)	5 (1)
Other Specifications: Daily Amount Based on the Average for a 5-Day Week			
Min-max calories (kcal)	350-500	400-550	450-600
Saturated fat (% of total calories)	<10	<10	<10
Sodium limit through June 30, 2027	≤ 540 mg	≤ 600 mg	≤ 640 mg
Sodium limit beginning July 1, 2027	≤ 485 mg	≤ 535 mg	≤ 570 mg
Added sugars (% of total calories)— must be implemented by July 1, 2027	<10	<10	<10

^a Food items included in each group and subgroup and amount equivalents.

^b Minimum creditable serving is 1/8 cup. Schools must offer 1 cup of fruit daily and 5 cups of fruit weekly. No more than half of the fruit or vegetable offerings may be in the form of juice. All juice must be 100% full-strength. Schools may substitute vegetables for fruit at breakfast as described in paragraphs (c)(2)(i) and (ii) at 7 CFR 210.10.

^c Minimum creditable serving is 0.25 oz. eq. School may offer grains, meats/meat alternates, or a combination of both to meet the daily and weekly ounce equivalents for this combined component. At least 80 percent of grains offered weekly at breakfast must be whole grain-rich as defined in § 210.2, and the remaining grain items offered must be enriched.

^d Minimum creditable serving is 8 fluid ounces. All fluid milk must be fat-free (skim) or low-fat (1 percent fat or less). Milk may be flavored or unflavored, and unflavored milk must be offered at each meal service.

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Fruit Component

SBP Fruit Component					
	K-5	6-8	9-12	K-8	K-12
Daily Minimum (cups)	1	1	1	1	1
Weekly Total (cups)	5	5	5	5	5

Types of Fruit & Crediting Information

Like in the NSLP, fruits that are fresh, frozen, dried, canned (packed in water, full-strength juice, or light syrup) and full-strength juice may contribute toward the fruit requirement in the SBP. No more than half of the required weekly cups of fruit may come from juice. All fruits credit toward the fruit component based on their volume as served, except for dried fruits, which credit as twice the amount served. The minimum quantity of fruits and/or vegetables that may be credited towards this component is 1/8 cup.

Vegetable Substitutes

Vegetables are not a required meal pattern component in the SBP. However, vegetables may be offered in place of all or part of the required fruits at breakfast to increase menu variety. When offering vegetables at breakfast one day per school week, any vegetable subgroup (including starchy) may be offered. When offering vegetables for fruits at breakfast on two or more days per school week, at least two different vegetable subgroups must be offered.

Smoothies

Smoothies may be offered as part of a reimbursable meal in the NSLP and SBP. Milk, yogurt, fruits, and vegetables used in smoothies may credit toward meal pattern requirements if they meet all USDA regulations. Smoothies can be made from scratch, commercially prepared mixes, or commercial ready-to-eat smoothies. Review USDA's guide [Offering Smoothies as Part of Reimbursable School Meals](#) for information on how smoothies can be credited in the NSLP and SBP.

Grains Component

SBP Grains Component					
	K-5	6-8	9-12	K-8	K-12
Daily Minimum (oz eq)	1	1	1	1	1
Weekly Minimum (oz eq)	7	8	9	8	9
Weekly Maximum* (oz eq)	10	10	10	10	10

*The weekly maximum may be exceeded as long as weekly calories, sodium, saturated fat, and sugar limits are not exceeded.

Types of Grains & Crediting Information

Like the NSLP, 80% of grains served throughout the week must be *whole grain-rich* (WGR), and any remaining grains must be *enriched* in the SBP. All grain products served in the SBP must be

credited based on per-ounce equivalent (oz eq) standards. When crediting grain products, grains round down to the nearest 0.25 oz eq. The minimum amount of grain creditable towards meal pattern requirements is 0.25 oz eq. Refer to the *Grains Component* section of the NSLP meal pattern in this chapter for additional information on the WGR requirement and crediting information. Beginning July 1, 2024, the grain component at breakfast may be met by serving grains, meat/meat alternates, or a combination of both.

Milk Component

SBP Milk Component					
	K-5	6-8	9-12	K-8	K-12
Daily Minimum (cups)	1	1	1	1	1
Weekly Total (cups)	5	5	5	5	5

Types of Milk and Requirements

Like the NSLP, all milk provided in the SBP must be fat-free (skim) or low-fat (1%), and may be unflavored or flavored. SFAs must offer at least two varieties of fluid milk during the meal service, and one of those options must be unflavored.

Dietary Specifications

SBP Dietary Specifications					
	K-5	6-8	9-12	K-8	K-12
Calories (kcal)	350-500	400-550	450-600	400-500	450-500
Saturated Fat (% of total calories)	<10	<10	<10	<10	<10
Sodium limit through June 30, 2027	≤ 540 mg	≤ 600 mg	≤ 640 mg	≤ 540 mg	≤ 540 mg
Sodium limit beginning July 1, 2027	≤ 485 mg	≤ 535 mg	≤ 570 mg	≤ 485 mg	≤ 485 mg
Added sugars (% of total calories)— must be implemented by July 1, 2027	<10	<10	<10	<10	<10

Similar to the NSLP, the standards for calories, sodium, saturated fat, and sugar are based on averages for the school week. Throughout the week, one or more days may fall outside of the required calorie range, or above the sodium, saturated fat, and sugar limits. However, other days during that week must balance out those averages so that meals fall within the above requirements.

Product-Based Added Sugar Limits

Limits on specific high-sugar products, including milk, yogurt, and cereal, go into effect July 1, 2025. Breakfast cereals may have no more than 6 grams of added sugars per dry ounce. Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce). Flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces, or for flavored milk sold as a competitive food for middle and high schools, 15 grams of added

sugars per 12 fluid ounces. For additional guidance, please review USDA's [Reducing Added Sugars at School Breakfast](#) guide.

Offer Versus Serve

In the SBP, students must be offered all three meal pattern components (i.e. grains, fruits, and milk). Under *offer versus serve* (OVS), these three components must be offered as at least four *items*. The term *item* is specific to the SBP and refers to a specific food offered within one of the three food components. USDA sets serving size standards for what is considered an *item* for each component.

What Counts as an <i>Item</i> in the SBP?	
Component	1 <i>Item</i> Equals
Fruits	1/2 cup
Grains	1 oz eq
Milk	1 cup

Under OVS, students are allowed to decline one *item* at breakfast. Three *items* must be selected, and at least a ½ cup of fruit (or vegetable substitution) must be selected for the meal to be reimbursable. OVS is optional for all grade groups at breakfast.

Fruit Item

One *item* of fruit is equal to a ½ cup. At a minimum, SFAs are required to offer one cup of fruit daily in the SBP. Therefore, SFAs have the option to offer multiple fruits in ½ cup amounts. This satisfies the requirement of offering at least one cup of fruit daily, and would provide multiple *items* toward the OVS requirement to offer at least 4 *items*.

Grain Item

One *item* of grain is equal one oz eq. Products with more than one oz eq of grain (or M/MA substitution) may count as multiple *items* depending on the amount of grains present. For example, a 2 oz eq bagel may credit as two *items* for OVS purposes. Therefore, a student who selects that bagel would have two out of three *items* needed for a reimbursable meal in the SBP. SFAs may also choose to count a 2 oz eq bagel as 1 *item* at their own discretion.

Milk Item

One *item* of milk is equal to one cup. Milk does not need to be selected in order for a meal to be reimbursable under OVS.

Additional OVS guidance can be reviewed in USDA's [Offer Versus Serve: Guidance for the National School Lunch Program and the School Breakfast Program](#).

Preschool Meals in the School Nutrition Programs

Preschool meals served through the NSLP and SBP are designed to meet the nutritional needs of young children. Schools serving meals to children in preschool (ages 1 through 5) under the NSLP and SBP must serve the food components and quantities required in the Child and Adult Care Food Program (CACFP) lunch or breakfast meal pattern. The preschool meal pattern is provided in the chart on the following page. It should be noted that there are several differences between the preschool meal pattern and the standard school meal pattern. An overview of these differences are described in USDA's guide to [Serving School Meals to Preschoolers](#).

Age Groups & Food Components

There are two age groups under the preschool meal pattern: children 1-2 years old, and children 3-5 years old.

The preschool meal pattern for breakfast includes three meal pattern components: 1) milk, 2) fruits/vegetable/combo of fruits and vegetables, and 3) grains. All three components must be served for a reimbursable breakfast.

The preschool meal pattern for lunch includes five meal pattern components: 1) milk, 2) fruits, 3) vegetables, 4) grains, and 5) meat/meat alternates. All five components must be served for a reimbursable meal.

Additional information and details on the CACFP meal pattern, including creditable and non-creditable food items, can be found in USDA's [Crediting Handbook for the Child and Adult Care Food Program](#).

School Meal Pattern for Preschoolers

	Breakfast		Lunch	
	Ages 1-2	Ages 3-5	Ages 1-2	Ages 3-5
Milk ^{a,b,c}	½ cup (4 fl oz)	¾ cup (6 fl oz)	½ cup (4 fl oz)	¾ cup (6 fl oz)
Fruits ^{d,e}	¼ cup	½ cup	1/8 cup	¼ cup
Vegetables ^{d,e,f}			1/8 cup	¼ cup
Grains ^{g,h}	½ oz eq	½ oz eq	½ oz eq	½ oz eq
Meat/Meat Alternates ⁱ	0	0	1 oz eq	1 ½ oz eq

^a 1 year old children must be offered unflavored whole milk only. Children ages 2-5 must be offered unflavored low-fat (1%) or fat-free (skim) milk only

^b A one month transition period is allowed for children 12 to 13 months of age to allow time to adjust to cow's milk when switching from breastmilk or formula. Please note, breastmilk is considered an allowable fluid milk substitute for children of any age, if a mother chooses to breastfeed her child past 1 year of age

^c Unflavored whole milk and unflavored reduced-fat (2%) milk may be served to children between the ages of 24 and 25 months to help with the transition from whole milk to fat-free (skim) or low-fat (1%) milk

^d May serve fruits, vegetables, or combination of both to meet the combined vegetables/fruit component for breakfast for ages 1-2 and 3-5

^e May serve 100% juice once per day. If juice is served at breakfast, it cannot be served at lunch.

^f A second, different vegetable may be served in place of fruit at lunch for ages 1-2 and 3-5

^g At least one of the grains offered per day must be whole grain-rich. Enriched grains may be served at breakfast if whole grain-rich items are served at lunch.

^h Grain-based desserts may not credit toward the grain component. Refer to *Exhibit A: Grain Requirements for Child Nutrition Programs* for additional information.

ⁱ Meats/meat alternates may be served in place of the entire grains component up to 3 times per week at breakfast. The minimum serving size for both age groups is ½ oz eq. When substituting the meat/meat alternate at breakfast, it must be substituted for the entire grains component. May not count a combination of grains and meats/meat alternates toward the grains component.

Milk

The CACFP regulations require that each participant's breakfast and lunch include fluid milk to be eligible for reimbursement. The breakfast meal pattern requires that a serving of fluid milk be served as a beverage, used on cereal, or used in part for each purpose. Lunch must contain a serving of fluid milk as a beverage.

Milk must be unflavored whole milk for children who are one year old. Milk must be unflavored low-fat (1%) or unflavored fat-free (skim) for children two to five years old. However, USDA allows transition periods for children 12-13 months old and 24-25 months old. Iron-fortified formula may be served to children between the ages of 12 months and 13 months to help with the transition to whole milk. Children 24 months to 25 months old may be served whole milk or reduced-fat milk (2%) to ease the transition to low-fat (1%) or fat-free (skim) milk. Breastmilk is allowed at any age in the CACFP.

Fruits and Vegetables

For breakfast, the CACFP regulations require a serving of fruits, vegetables, or a combination of both. For lunch, the CACFP meal pattern includes a separate fruit component and vegetable component. However, menu planners have the flexibility to serve a second, different vegetable in place of the fruit requirement at lunch. It should be noted that two servings of the same vegetable (even in different forms, such as raw carrots and cooked carrots) provided at the same meal do not count as two different vegetables and cannot be served in place of the fruit requirement.

A reimbursable meal at breakfast must contain:

- The minimum required serving of fruit OR
- The minimum required serving of vegetable OR
- Adequate portions of both a fruit and vegetable to provide the minimum required serving

A reimbursable lunch must contain:

- The minimum required serving of fruit and the minimum required serving of vegetable OR
- Two different minimum servings of vegetables

Fresh, frozen, dried, and canned fruit, as well as full-strength fruit juice may contribute to the fruit component. Fresh, frozen, dried, and canned vegetables, as well as full-strength vegetable juice may contribute to the vegetable component. Full-strength 100% fruit and vegetable juice may count toward the entire fruits or vegetables component at one meal per day. Commercial fried fruit chips, such as banana chips, are not creditable toward the fruit component. Snack chips, such as potato chips, are not creditable toward the vegetable component. Additionally, home-canned fruit and/or vegetable products are not allowed in the CACFP due to health and safety reasons.

In most cases, fruits and vegetables are credited based on their volume as served. The minimum creditable portion size of fruit and vegetable is an ⅓ cup or 2 tablespoons. Dried fruit credits as twice the volume served. Raw leafy greens credit as half the volume served.

Grains

Grains are a required component for a reimbursable breakfast and lunch. However, meat/meat alternates may be used to meet the entire grains requirement a maximum of three times per week at breakfast (refer to the *Meat/Meat Alternate* section below).

All grain products served in the CACFP must be made with whole grains or enriched meal and/or enriched flour, or bran or germ, in order to be creditable. At least one serving per day across all eating occasions must be whole grain-rich, which refers to products that contain at least 50% whole grains, and any other grains in the product are enriched.

The minimum amount of grains that can credit toward the grains component is 0.25 ounce equivalents. Grain-based desserts do not count towards meeting the grains requirement. Refer to the [Crediting Handbook for the Child and Adult Care Food Program](#) for information on crediting grains in the CACFP. USDA's [Exhibit A: Grain Requirements for Child Nutrition Programs](#) provides the minimum portion sizes of grain products that are required to meet the meal pattern for each age group.

Meat/Meat Alternates

The CACFP regulations require that lunch meals contain a serving of meat/meat alternate as specified in the meal pattern. To meet the minimum serving, the meat/meat alternate for lunch may be served in the main dish, or in the main dish together with another menu item. A menu item must provide at least 0.25 ounce equivalents of meat or meat alternate to count towards the meat/meat alternate requirement.

A meat/meat alternate is not required to be served at breakfast. However, meats and meat alternates may be used to meet the entire grains requirement a maximum of 3 times per week at breakfast. One ounce of meat/meat alternate is equal to 1 ounce equivalent of grains.

Nutrient Limits

Cereals and yogurt have set sugar limits under the preschool meal pattern.

Sugar Limits in the Child and Adult Care Food Program		
	Through September 30, 2025	Beginning October 1, 2025
Cereal	6 grams (g) or less per dry oz	6 grams (g) or less per dry oz
Yogurt	23 grams (g) or less per 6 oz	12 grams (g) or less per 6 oz

Additionally, deep-fat frying (cooked by submerging in hot oil or other fat) is not allowed onsite, including at central kitchens.

Offer Versus Serve

Offer versus serve (OVS) is not allowed under the preschool meal pattern. OVS is only allowed when preschool students are *co-mingled* with older children and following the meal pattern for older students. When following OVS during *co-mingling*, students must select at least three food items, and one of those items must be at least a ½ cup of fruits and/or vegetables.

Co-Mingling

Sometimes, schools must serve meals to a variety of grades at the same time. This is usually due to operational constraints, such as time and space. USDA refers to this practice as *co-mingling*. When each of the following conditions are met, the meal service is considered to be *co-mingled* and schools may offer the meal pattern of the older grades, such as K-5, to preschool students:

- Preschool students and students from older grade groups (such as K-5) are served meals in the same place at the same time,
- It is difficult to differentiate preschool students from older students, **AND**
- It would be operationally difficult to serve different foods or different amounts of foods during the combined meal service

If each of these conditions are not met, schools must follow the preschool meal pattern. USDA strongly encourages schools to find ways to serve grade-appropriate meals to preschoolers.

NSLP Afterschool Snack Service

The afterschool snack component of the NSLP is a federally assisted snack service that fills the afternoon hunger gap for school children. This afterschool care program must provide children with regularly scheduled educational or enrichment activities in a supervised environment.

Food Components and Serving Sizes

Afterschool snacks must contain at least two different components of the following five: milk, meat/meat alternates, grains, fruits, and vegetables. It should be noted that two items from the same component cannot be served. Only one of the two components may be a beverage. Each component is described in more detail in the sections that follow.

NSLP Afterschool Snack Service Meal Pattern for K-12 (Ages 6-18)

Meal Components ¹	Minimum Quantities ²
Milk ³	8 fluid ounces
Meat/Meat Alternate ⁴	1 ounce equivalent
Vegetables ⁵	$\frac{3}{4}$ cup
Fruits ⁵	$\frac{3}{4}$ cup
Grains ⁶	1 ounce equivalent

¹ Must serve two of the five components for a reimbursable NSLP snack. Only one of the two components may be a beverage.

² May need to serve larger portions to children ages 13 through 18 to meet their nutritional needs.

³ Must be fat-free (skim) or low-fat (1 percent fat or less). Milk may be unflavored or flavored.

⁴ Alternate protein products must meet the requirements in Appendix A of 7 CFR Part 226. Effective July 1, 2025, yogurt must contain no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).

⁵ Juice must be pasteurized, full-strength juice. No more than half of the weekly fruit or vegetable offerings may be in the form of juice.

⁶ At least 80 percent of grains offered weekly (by ounce equivalents) must be whole grain-rich, and the remaining grains items offered must be enriched. Grain-based desserts may not be used to meet the grains requirement. Effective July 1, 2025, breakfast cereal must have no more than 6 grams of added sugars per dry ounce.

USDA Smart Snacks in Schools

Competitive Foods and A La Carte Sales

USDA Smart Snacks in Schools – Competitive Foods and A La Carte Sales

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Additional Resources

- USDA Smart Snacks in Schools Website
<https://www.fns.usda.gov/school-meals/tools-schools-focusing-smart-snacks>
- Alliance for a Healthier Generation: Smart Snack Calculator
<https://foodplanner.healthiergeneration.org/calculator/>
- Illinois Administrative Rules – Part 305
<https://www.isbe.net/Documents/305ark.pdf>
- USDA Policy Memo – SP49-2016 (July 20, 2016) Resources for Making Potable Water Available in Schools and Child Care Facilities
https://fns-prod.azureedge.net/sites/default/files/cn/SP49_CACFP18_2016os.pdf
- Illinois Department of Public Health – School Water Testing
<http://www.dph.illinois.gov/content/school-water-testing>

USDA Smart Snacks in Schools - Nutrition Standards for All Foods Sold in Schools

All schools that participate in the National School Lunch and/or School Breakfast Programs are required to follow standards for all foods and beverages sold outside of or in addition to the reimbursable meal. These foods and beverages must meet the standards listed below. These standards apply during the school day anywhere on school campus/grounds. A school day is defined as midnight to 30 minutes after the end of the school day.

Foods and beverages that **do not** meet the following standards may only be sold:

- In the evenings, 30 minutes after the end of the school day;
- On weekends;
- Off campus; or
- On approved exempted fundraising days. See the Illinois Exempted Fundraising Days information at the end of this section.

Nutrition Standards for Foods

Any food sold in schools must:

- Be a “whole grain-rich” grain product; or
- Have as the first ingredient a fruit, a vegetable, a dairy product, or a protein food; or
- Be a combination food that contains at least $\frac{1}{4}$ cup of fruit and/or vegetable; or

Foods must also meet several nutrient requirements:

- Calorie limits:
 - Snack items: ≤ 200 calories
 - Entrée items: ≤ 350 calories
- Sodium limits:
 - Snack items: ≤ 200 mg
 - Entrée items: ≤ 480 mg
- Fat limits:
 - Total fat: $\leq 35\%$ of calories
 - Saturated fat: $< 10\%$ of calories
 - Trans fat: zero grams
- Sugar limit:
 - $\leq 35\%$ of weight from total sugars in foods

Nutrition Standards for Beverages

All schools may sell:

- Plain water (with or without carbonation);
- Unflavored low fat milk;
- Unflavored or flavored fat free milk and milk alternatives permitted by NSLP/SBP;
- 100% fruit or vegetable juice; and
- 100% fruit or vegetable juice diluted with water (with or without carbonation), and no added sweeteners.

Elementary schools may sell up to 8-ounce portions.

Middle schools and high schools may sell up to 12-ounce portions.

There is no portion size limit for plain water.

High schools may sell additional “no calorie” and “low calorie” beverage options:

- No more than 20-ounce portions of:
 - Calorie-free, flavored water (with or without carbonation); and
 - Other flavored and/or carbonated beverages that are labeled to contain < 5 calories per 8 fluid ounces or ≤ 10 calories per 20 fluid ounces.
- No more than 12-ounce portions of:
 - Beverages with ≤ 40 calories per 8 fluid ounces, or ≤ 60 calories per 12 fluid ounces.

Other Requirements

Fundraisers

- The sale of food items that meet nutrition requirements at fundraisers are not limited in any way under the standards.
- The standards do not apply 30 minutes after the end of the school day, on weekends and at off-campus fundraising events.
- The standards provide a special exemption for infrequent fundraisers that do not meet the nutrition standards. State agencies may determine the frequency with which fundraising activities take place that allow the sale of food and beverage items that do not meet the nutrition standards. See the *Illinois Exempted Fundraising Days* information at the end of this section.

Accompaniments

- Accompaniments such as cream cheese, salad dressing and butter must be included in the nutrient profile as part of the food item sold.

- This helps control the amount of calories, fat, sugar and sodium added to foods by accompaniments, which can be significant.

Alliance for A Healthier Generation Smart Snacks Product Calculator

The calculator is designed to help school food service quickly and easily determine which products meet the new USDA standards.

- [Smart Snacks Product Calculator](#)

Illinois Exempted Fundraising Days – Illinois 305 School Food Service Rules

Allowable Number of Exempted Fundraising Days:

- Grades 8 and *below*, **prohibited**; and
- *Grades 9 through 12*, limited to no more than nine (9) days.

The provisions listed above **do not** limit the number of foods and beverages that may be sold to students on an exempted fundraising day nor do they limit the number of organizations or clubs to which a participating school may grant permission to offer competitive food for sale to students on an exempted fundraising day.

In order to have exempted fundraising days, a participating school shall:

- Adopt a policy stating the procedures to be used to request an exempted fundraising day, and the process and criteria to review and approve or deny a request;
- Include the fundraising policy in the participating school's local school wellness policy; and
- Maintain for no less than three years a listing of the exempted fundraising days held.

Revenue from Sale of Competitive Foods

All revenue from the sale of any food or beverage that is sold to students in the food service area(s)* during the meal period** shall accrue to the nonprofit school lunch program account.

* Food service area refers to any area on school premises where program meals are served and/or eaten. Areas that are separate from the serving lines are considered part of the food service area if program meals are served and/or eaten, e.g. classrooms, multi-purpose rooms and outdoor commons area.

** Meal periods include both the serving time and the time the student spends eating the meal. Schools participating in the National School Lunch Program must offer a reimbursable meal between the hours of 10 a.m. and 2 p.m. unless an exemption from these times is granted by the Illinois State Board of Education. The USDA recommends students are given enough time to eat and socialize, at least ten minutes after receiving breakfast and at least twenty minutes after receiving lunch.

Potable Water Requirements

Schools participating in the NSLP must make potable water available to children at no charge where meals are served during the meal service.

Ensuring Availability of Potable Water

Most Program operators, including schools, obtain drinking water through a public water system. Public water systems are required to ensure that the water provided meets Federal and State drinking water standards. However, plumbing systems within facilities also can affect the quality of the drinking water. In some instances, the plumbing systems within facilities may expose the water to contamination, including lead contamination. The U.S. Environmental Protection Agency (EPA) regulates public water systems and provides resources related to safe drinking water. The EPA recommends that all schools and child care facilities routinely test drinking water for lead and perform regular maintenance to ensure that drinking water is safe (see <https://www.epa.gov/dwreginfo/lead-drinking-waterschools-and-child-care-facilities>).

Program operators who test tap water and water fountains that will be used by students and children in care should contact the lead (supervising) officer for the local health department or the public water provider for information about certified laboratories that can test for contaminants.

Allowable Costs Related to the Availability of Potable Water

For the majority of operators, FNS expects the potable water requirement to result in the incursion of minimal or no costs. However, costs related to the purchase of potable water for consumption by Program participants, or water testing services, would be considered an allowable use of nonprofit food service account funds if the costs are determined to be reasonable, necessary, and allocable to the Federal meal programs. See 2 CFR 200.404 and 200.405.

First, the cost must represent an activity or function that is generally recognized as reasonable and necessary for the operation of the Program. The cost must be essential to fulfill regulatory requirements for proper and efficient administration of the Program. A cost is considered necessary if it is needed for operation of the Program.

Second, the cost must be allocable. That is, if it benefits both the Program and other activities, it can be distributed to each in reasonable proportion to the benefit received. If a cost benefits two or more purposes or activities in proportions that can be determined without undue effort or cost, the cost must be allocated to each based on the proportional benefit.

In general, nonprofit school food service account funds and nonprofit CACFP food service account funds may not be used for costs that add materially to the value of the school building, related facilities, and child care facilities, or appreciably prolong their intended life, such as

remediation of facility plumbing. Consistent with government-wide requirements for the use of Federal funds, NSLP regulations at 7 CFR 210.14(a) prohibit the use of nonprofit school food service account funds to purchase land or buildings (except with FNS prior approval) or to construct buildings. The use of nonprofit school food service account funds for capital improvements is therefore prohibited. Costs associated with remediation or repair to a child care facility or school building plumbing would add to the permanent value of the child care facility or school building and should therefore be borne by the school district's or child care facility's general fund.

However, equipment to filter water (e.g., a reverse osmosis filter system in a school or child care facility kitchen) could meet the reasonable and necessary tests if the program participants are the primary, if not exclusive, beneficiaries. Whether it does so depends on the cost, the need for such equipment, and if the Program operator can demonstrate that:

- It has sufficient funds,
- The Program operator is lacking in capital improvement funding, and
- The expenditure is necessary to carry out the mission of the program.

It is difficult to assess reasonableness without knowledge of the specific cost and an understanding of that cost. Many costs must be analyzed on a case-by-case basis in order to determine if the cost is truly reasonable; in such cases, the Program operator must consult with and obtain approval from its State agency prior to initiating any expenditure.

WINS

(Web-Based Illinois Nutrition System)
Questionnaires, Reports, and Claims

WINS Online Questionnaires, Reports, and Claims

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Other Reports in WINS	E-6
Completing Claims for Reimbursement	E-7



Additional Resources

- ISBE Nutrition Division Instructions for Online Applications and Reports Webpage
<https://www.isbe.net/Pages/School-Nutrition-Applications-and-Reports.aspx>

ISBE Web-based Illinois Nutrition System (WINS)

Sponsor and Site questionnaires and claims are submitted online through the Web-based Illinois Nutrition System (WINS).

New Sponsors

Sponsors that are new to the federal and/or state meal/milk programs must first complete a new sponsor application process. The process starts by submitting the required paperwork to our office. The paperwork is available online at <https://www.isbe.net/Pages/School-Nutrition-Programs.aspx>. The application process can take 60-90 days to complete. Once approved ISBE staff will work with new Sponsors to get access WINS.

Currently Participating Sponsors in the School Nutrition Programs

Accessing the School Nutrition Programs WINS system through IWAS

Step 1— Access the Illinois State Board of Education (ISBE) website at www.isbe.net/nutritionandwellness. Click *Log In to IWAS* (Illinois Web Application Security) at the top of the page.

The screenshot shows the ISBE website's 'Nutrition and Wellness' page. At the top right, there are navigation links: 'System Quick Links', 'Illinois Report Card', 'Careers at ISBE', 'Contact Us', and social media icons for Twitter and Facebook. Below this is a dark blue navigation bar with icons and labels for 'ADMINISTRATORS', 'TEACHERS', 'FAMILIES & STUDENTS', 'COMMUNITY & PARTNERS', and 'NEWS & MEDIA'. The main content area has a breadcrumb trail 'Home > Nutrition and Wellness'. On the left, there is a sidebar with a 'Nutrition and Wellness' menu and a 'RESOURCES' section listing various documents and reports. The main content area features a heading 'NUTRITION AND WELLNESS' followed by a welcome message and a list of programs. A prominent red button labeled 'Log In to IWAS' is circled in red. Below this is a 'What's New?' section with a list of recent updates and news items.

Step 2— Enter login name and password and then click *Login*. Users that do not have an IWAS account, click *Sign-Up Now* on the right side of the IWAS homepage and follow the instructions. Users without an administrative IWAS account that have requested access to WINS will need to have the administrator of their organization approve access to WINS. For user information about IWAS, click on the *IWAS User Guide* on the left side of the IWAS homepage. If you have issues login into IWAS or with access to IWAS call 217-558-3600 for help specifically with IWAS.

Step 3— Click on *System Listings* found on the left side of the screen.

Step 4— Click on *Web-based Illinois Nutrition System (WINS)* to access the sponsors WINS Dashboard.

Helpful WINS Dashboard Icons



The screenshot shows the top of the WINS Dashboard. A blue header bar contains the text "Web-based Illinois Nutrition System". Below the header, there are several navigation icons: a house icon, a magnifying glass icon, a paperclip icon, a yellow square icon, and a question mark icon. To the left of these icons is the text "WINS Dashboard". To the right of the icons are two dropdown menus labeled "Program Year:" and "Program:". Below the icons, there are five numbered items, each with an icon and a description:

- 1 Home** - This icon will return users to their main WINS Dashboard
- 2 Site lookup** - This icon will take user to a page to search for individual sites
- 3 Attachments** - This icon takes users to a page where all attached documents are stored. The approval letter will be attached and all supporting documentation for sponsors. Sponsors may also send documents to ISBE using this link.
- 4 Notes** - Clicking on this icon will open a page that will allow users to view any notes placed by ISBE staff or allows sponsor to post notes for ISBE
- 5 Help** - This icon provides a listing of all help documents and instructions developed to assist users through the completion of different tasks throughout the WINS system.

Sponsor and Site Applications / Questionnaires

Each year all sponsors must complete the Sponsor and Site Questionnaires to participate in the school nutrition programs. The annual application is generally available in April.

It is HIGHLY recommended that the instructions provided by ISBE be used to complete the application process. The instructions include step-by-step instructions, screen shots, helpful tips and guidance.

Instructions for each year's application will be posted both under the blue and yellow question mark within the WINS system and also on our [webpage](#).

*****Please note that the program year for the School Nutrition Programs (SNP) has changed. As of program year 2017 we run on a July 1-June 30 program year calendar.**

Due Dates

The application will become available in April of each year and the due date is May 30th. If a site is participating in the Seamless Summer Option (SSO) the application must be completed prior to the first day of SSO.

Updating the WINS Application

Throughout the year, sponsors many need to make updates to the application. Common updates include adding or removing serving days, perhaps due to use of snow days or ending the school year earlier than anticipated. Instructions for making these updates are located in the WINS system under the blue and yellow question mark.

Updating Sponsor/Site information, Authorized Representative, & Contact Persons

Districts and sponsors can make most changes in the IWAS system through ISBE's Entity Profile System (EPS). The WINS system ties to the EPS system for official school district names, school site names, addresses, contact information and the Authorized Representative (District Administrator). For WINS we must tie to the official school information.



Within the WINS system, a small paper and pen icon indicates Information which can be updated directly in WINS

Anywhere this icon is present, the information can be changed directly in WINS. If this icon is not present, the update must be made through EPS or request the update through the Nutrition Division.

What info can I update directly in WINS myself?

- Any information that has this icon:

- Contact & Claim Contact Information and sometimes the delivery address (if applicable and it has the paper and pen icon). Please note this is for the delivery of mail, not your USDA Foods orders. USDA Foods delivery addresses are maintained in the Illinois Commodity System (ICS)

What info do I need to update in EPS? (no paper and pen icon)

- Public School District & Sponsoring Organization Information (district name, address, etc)
- Public School & Non-Public School Site Information (school name, address, etc)
- Public School District Authorized Representative, Non-Public School Authorized Representative, Sponsoring Organization Authorized Representative Information
- Public School & Non-Public School Principal (name and contact info)
- Delivery address (ONLY if there is no paper and pen icon)

For instructions on updating EPS information, please view the [EPS guide](#).

For any further questions on the Entity Profile System, please call Ann Plogger at (217) 558-3600 or Brenda Umek at (217) 782-3950.

What type of info should I contact Nutrition Programs staff to update? (no paper and pen icon)

- Sites that are Residential Child Care Institutions, camps and/or non-school sites

For RCCI sites, camps and non-school sites email Nutrition Programs staff at cnp@isbe.net with information to be updated.

Closing a Site and/or Sponsor

Closing a Site

Sponsors that have a site that will no longer be participating in the SNP or that is officially closing with the ISBE can request that that site be closed in the WINS system by going to the blue and yellow question mark within the WINS system and selecting the document titled *Close Site* – complete that form and then send it to our office. Instructions for how to send it to our office are listed at the top of the *Close Site* form.

Closing a Sponsor

A sponsor that has determined none of its sites will continue to participate in the SNP or in which all of its sites are officially closing with ISBE can request that that the sponsor be closed in the WINS system by going to the blue and yellow question mark within the WINS system and selecting the document titled '*Sponsor Close Form*' – complete the form and then send it to ISBE. Instructions for how to send it to ISBE are listed at the top of the *Sponsor Close Form*.

Adding a New Site

Sponsors that wish to add a new site to the SNP can submit a request in the WINS system. Once logged into WINS, locate the link 'Add New Site' on the Sponsor Tasks tab from the home/main dashboard.

The screenshot shows the WINS system dashboard with the following structure:

- Navigation tabs: Sponsor Tasks, Sponsor Applications & Participation, Site Applications, Claims & Monitoring, Sponsor Info.
- Section: Administrative Tasks
- Sub-sections:
 - Sponsor Tasks:** Batch Daily Meal Counts, Batch Participation Detail, **Add New Site** (highlighted with a red arrow), Deactivate/Re-activate Site(s), Deactivate Sponsor.
 - Site Application Tasks:** Enroll Site In New Program, Edit Site Questionnaire, Edit Program Participation, Edit Participation Detail.
 - Reports:** Waiver Submissions, Participation / Claiming Summary By Site, Applications Not Received, NSLP Verification Summary Report, Direct Certification, Deleted Sites, Claim Data Report, Summary Reports - Applications Submitted for Sponsor, Summary Reports - Applications Submitted for Sites, Summary Reports - List of Sites and Applications Submitted.
 - Budget:** No WINS Budgets required.

Clicking the *Add New Site* link will open the pop-up pictured below.

Complete all of the requested information and hit Submit.

Please allow up to 15-20 business days for review and approval of new site requests.

NOTE: For school sites – only official schools listed with ISBE in the Entity Profile System (EPS) can be added as schools.

The 'Sites' pop-up form contains the following fields:

- Program Type: National School Lunch (dropdown)
- Program Year: 2017 (dropdown)
- Entity Type: (dropdown)
- Entity Information:** Site Name, Site Address, Site City, Site State (IL dropdown), Site Zip.
- Site Contact Information:** First Name, Middle Name, Last Name, Title, Email, Business Phone (with Ext. field), Fax Number (with Ext. field), Cellular (with Ext. field).
- Buttons: Submit, Cancel.

Other Reports in WINS

Verification Summary Report (VSR)

The VSR is completed through the WINS system. See the Verification Section of the [Administrative Handbook](#) for more information regarding the VSR.

Electronic Direct Certification

The Direct Certification reports are available each month through the WINS system. For more information about Direct Certification, see the Electronic Direct Certification section of the [Administrative Handbook](#).

Commonly Used / Needed Information Available in the WINS System



The screenshot shows a navigation menu with the following structure:

- Top navigation tabs: Sponsor Tasks, Sponsor Applications & Participation, Site Applications, Claims
- Sub-navigation tabs: Administrative (highlighted), Sponsor Tasks, Reports
- Under 'Sponsor Tasks':
 - Batch Daily Meal Counts
 - Batch Participation Detail
 - Provision Group Maintenance
 - Add New Site
 - Deactivate/Re-activate Site(s)
 - Deactivate Sponsor
- Under 'Reports':
 - Waiver Submissions
 - Participation / Claiming Summary By Site
 - Applications Not Received
 - NSLP Verification Summary Report
 - Direct Certification
 - Deleted Sites
 - Claim Data Report
 - Summary Reports - Applications Submitted for Sponsor
 - Summary Reports - Applications Submitted for Sites
 - Summary Reports - List of Sites and Applications Submitted

Provision Group Maintenance – this link is ONLY available to sponsors having at least one site participating in the Community Eligibility Provision (CEP). By clicking this link, the user can view their specific CEP data, including site level information and grouping information, along with the begin and end date(s) of their CEP cycle.

Claim Data Report – a report with your claim data is available on the home/main dashboard page of WINS on the Sponsor Tasks tab under Reports.

Claims for Reimbursement

[Claims for Reimbursement Instruction Manual](#)

Claim Timeline

A Claim for Reimbursement must be submitted through WINS. Submit one claim per site for each month of operation. To ensure prompt payment, it is recommended claims be submitted by the 10th of the month following the month being claimed. For example, the Claim for Reimbursement for the month of October should be submitted to ISBE no later than November 10.

Federal regulations require ALL valid final claims to be submitted no later than 60 calendar days following the last day of the full month covered by the claim.

This applies to ALL original claims AND upward revisions.

Downward revisions must continue to be submitted at any time.

Funding and Disbursements Division

For questions regarding Claims for Reimbursement, contact ISBE's Funding and Disbursements Division at 217.782.5256.

For IWAS and WINS technical problems, contact ISBE's Technical Assistance at 217.558.3600.

Electronic Direct Certification

Electronic Direct Certification

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Additional Resources

- ISBE Electronic Direct Certification webpage
<https://www.isbe.net/Pages/Electronic-Direct-Certification-Process.aspx>

Certification of Eligibility

Meal benefits can be issued using one of following methods:

- Categorical Eligibility using the Electronic Direct Certification System. Students receiving *Supplemental Nutrition Assistance Program (SNAP)*; *Temporary Assistance to Needy Families (TANF) income –eligible Medicaid (began November 1, 2016)*; and *Foster children*.
- Categorical Eligibility using listing from Coordinator(s) – Homeless; Migrant; Runaway; Head Start; or Foster children. Between September 1 and June 30 annually, a direct certification report for Homeless, Migrant and Head Start is available in the Electronic Direct Certification System.
- Household Eligibility Application (HEA)
 - a. Based on household income.
 - b. Based on valid SNAP or TANF case numbers provided on the application including the extension of such benefits to ALL household members. **Since income levels are not known when a household provides a Medicaid number on a HEA or displays a Medicaid card, it is NOT allowable for determining eligibility for meal programs.**

Any households questioning their eligibility for FREE meals through direct certification by SNAP, TANF or income eligible Medicaid should contact the Illinois Department of Human Services (DHS). DHS may be able to provide information to households as to why a student is listed as participating in SNAP, TANF or income eligible Medicaid. The DHS helpline is 800-843-6154 or visit and select [Family Community Resource Center](#) as the office type and county to obtain local office contact information.

This section of the handbook will only address the Categorical Eligibility using the Electronic Direct Certification System. Refer to the *Certification of Eligibility* section of this handbook for all other methods of determining meal benefit eligibility.

Electronic Direct Certification System

Direct certification is a simplified process where LEAs certify students are receiving SNAP, TANF, income eligible Medicaid or are a Foster child. Any student able to be directly certified is eligible for FREE school meals/milk, without a household eligibility application, based on information provided by the State/local agency administering those programs for the entire school year, plus the carryover period of the next school.

Utilizing the Electronic Direct Certification System is a requirement of the National School Lunch Program (NSLP). LEAs are required by the USDA to conduct direct certification a minimum of three times as follows: 1) At or around the beginning of the school year, 2) Three months after the initial effort, and 3) Six months after the initial effort. Students that are directly certified are not subject to verification. **For the direct certification system to be most effective, LEAs are encouraged to use each of the monthly files.**

The direct certification system may be used to directly certify HEAs submitted that have provided a SNAP/TANF case identification number and/or income information, but cannot be used to deny the initial application for meal benefits. For example, if a household completes a HEA with a SNAP case ID number, a staff person may attempt to locate that SNAP case ID number or student name within the Electronic Direct Certification System. If the case ID number or student is found, the student is directly certified for FREE meal benefits, and the application does not need to be processed. However, if the SNAP case ID number is not found, the HEA must be processed at face value as submitted by the household.

The system is set up to obtain eligibility information three different ways: 1) Annual or Monthly Match; 2) Sponsor File Upload Match; and 3) Single Child Match. Complete step-by-step instructions for each method are provided later in this section.

LEAs are required to maintain the PRINT report available from the Electronic Direct Certification System but also have access to the annual or monthly match and sponsor match data using a downloadable file. Such downloadable files will be beneficial for LEAs that have point-of-service software programs. Please check with the point-of-service software company for information regarding this process.

Accessing the Electronic Direct Certification System

The Electronic Direct Certification System is securely accessible by LEAs participating in the Child Nutrition Programs through ISBE Web Application Security (IWAS) from the main dashboard of the Web-based Illinois Nutrition System (WINS).

Step One: Access IWAS at www.isbe.net/nutrition

The screenshot shows the Illinois State Board of Education website. At the top left is the ISBE logo. The top navigation bar includes links for System Quick Links, Illinois Report Card, Careers at ISBE, Contact Us, and social media icons for Twitter and Facebook. A search bar and a Translate dropdown are also present. Below this is a dark blue navigation bar with icons and labels for HOME, ADMINISTRATORS, TEACHERS, FAMILIES & STUDENTS, COMMUNITY & PARTNERS, NEWS & MEDIA, and TOPICS. The main content area is titled 'Nutrition and Wellness' and features a sidebar menu with items like Child and Adult Care Food Program, Enhanced Physical Education, Food Distribution, Resources, Webinars and Workshops, School Nutrition Programs, and Summer Food Service Program. The main text area contains a welcome message and a list of programs administered by the division. A red button labeled 'Log in to IWAS' is circled in blue.

Step Two: Enter *Login Name* and *Password* to access IWAS. For questions regarding IWAS, contact ISBE Technology Support at 217/558-3600.

Illinois State Board of Education
James T. Meeks, Chairman Tony Smith, Ph.D., State Superintendent

Already have an account? Login Here :

Login Name

Password

Remember Login Name

LOG IN

Forgot Your Password?
If you have forgotten your login name or password, click on the link below.

Find Login/Password

New Partner - Sign up Now

Some ISBE web-based systems require electronic signatures. You can create your own logon id and password by clicking on the following link. After you establish your logon, you will then have the ability to request authorization to use ISBE's systems.

Sign Up Now

Need Help?
If you need help with logging in, the sign up procedure or your password, please click on the link below.

Help

This web site has been optimized for Internet Explorer 6.0 or above / Firefox 2.0 or above. You can download the latest version of these browsers by clicking on the following icons.

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Step Three: Once logged in to IWAS, click on *Systems Listing*.

Illinois State Board of Education
James T. Meeks, Chairman Tony Smith, Ph.D., State Superintendent

ISBE Administrator

Login: RRAMAGE

Home

System Listing

Pending Sign Ups

Pending Documents

Change Password

Preferences

Search

Help

Log Out

IWAS Training Video

Messages :

0 unread Inbox message(s)

0 unread Archived message(s)

Require Action :

0 Sign-ups pending your approval

0 Documents pending your approval

0 Feedback messages pending review

We have your email address listed as:
rramage@isbe.net
If this is NOT correct, [click here](#) to update.

News Items

How to Open and Close Public Schools: ISBE Notification Procedure

Each year some Public School Districts need to open or close schools. Click 'More...' to see the instructions for notifying ISBE about these changes... [More...](#)

Changes in IWAS Administrative Accounts

Many organizations that do electronic business with ISBE have new administrators that officially take effect on July 1... [More...](#)

Public School District Consolidations/Annexations/Convergence and IWAS

If your public school district is going through consolidation or annexation, the information below may be of interest to you.

Norton SECURED
powered by Symantec
About SSL Certificates

Step Four: Select *Web-Based Illinois Nutrition System (WINS)*.

The screenshot shows the Illinois State Board of Education website. At the top, it says "Illinois State Board of Education" with the names of the Chairman and State Superintendent. Below that is a "My Systems" section. A navigation menu on the left includes options like Home, System Listing, Pending Sign Ups, etc. The main content area shows a tree view of system categories: Claims, ISBE Internal, and Web. Under the "Web" category, "Web-based Illinois Nutrition System (WINS)" is listed and circled in blue. To the right of this entry, there are icons for system description, due dates, and profile, along with an "Authorized" status indicator. A legend at the bottom explains the icons: a blue circle with an 'i' for System Description - Detailed, a calendar icon for Due Dates, and a person icon for Profile.

Step Five: From the dashboard of WINS, select *Direct Certification* located in the Reports area.

The screenshot shows the WINS dashboard with several tabs: Sponsor Tasks, Sponsor Applications & Participation, Site Applications, Claims & Monitoring, and Sponsor Info. The main content area is titled "Administrative Tasks" and is divided into four quadrants: Sponsor Tasks, Site Application Tasks, Reports, and Budget. The "Reports" quadrant contains a list of links, with "Direct Certification" circled in blue. The "Budget" quadrant shows the message "No WINS Budgets required."

Administrative Tasks	
Sponsor Tasks <ul style="list-style-type: none"> Batch Daily Meal Counts Batch Participation Detail Provision Group Maintenance Add New Site Close Inactive Site(s) Deactivate Site(s) Deactivate Sponsor 	Site Application Tasks <ul style="list-style-type: none"> Enroll Site in New Program Edit Site Questionnaire Edit Program Participation Edit Participation Detail
Reports <ul style="list-style-type: none"> Waiver Submissions Participation / Claiming Summary By Site Applications Not Received WINS Participation Summary Report Direct Certification Deleted Sites Claim Data Report 	Budget <p>No WINS Budgets required.</p>

Annual / Monthly Match - Public School Districts ONLY

Public schools districts will have access to ONE *Annual* report each school year, on or about July 1. The *Annual* report will identify students enrolled in the Student Information System (SIS) for the district. Student matches provided are based on the previous school year.

Public school districts have ONE *Monthly* report each calendar month, August through June, each school year. The *Monthly* report is available around the first of each month. For example, the August *Monthly* report will be available August 1. The *Monthly* report identifies students enrolled in the SIS for their district that are receiving SNAP, TANF, income eligible Medicaid or are Foster children that have been matched within the last month. This includes students newly enrolled in the school through SIS or newly receiving SNAP, TANF, income eligible Medicaid or foster child benefits. These students should be reviewed monthly to determine if FREE meal benefits may be provided to any students enrolled in the district. USDA requires that at a minimum direct certification be conducted near the beginning of the school year, three months after the initial effort and six months after the initial effort. The format of the *Monthly* report is similar to the *Annual* report with the minor change of *Annual* to *Monthly* in the title of the report. This method allows for schools to print and download the *Monthly* report.

Please note, the *Monthly* files only list new students each month. The *Monthly* files are not cumulative lists that will increase or add on students from month to month. Once a student is matched, the meal benefits are provided for the entire school year and the required carryover, unless subject to a reduction of benefits due to an error or verification activities. The student will NOT appear on the report for each subsequent month.

To obtain the *Annual* or *Monthly* match, once in the *Electronic Direct Certification System* follow the steps below.

Step One: Select *SNAP/TANF/MEDICAID* from the main menu on the upper left hand corner of the *Electronic Direct Certification System*.

Step Two: Select *Print* to view a copy of the *Annual* or *Monthly* match report. To print a copy, use the web browsers print option. ISBE requires that the report be printed, and filed at the school or district. Each LEA is required to maintain this documentation to support proof of eligibility of students, for three years plus the current year.

Step Three (Optional): Select *Download* to obtain the *Annual* or *Monthly* report a data format that may be uploaded to a Point-of-Sale (POS) Computer System or other system used to maintain eligibility information for the School-Based Child Nutrition Programs. For more information about downloading a file with the *Electronic Direct Certification System*, please reference the section of this guidance document titled *Downloading a File*.

Illinois State Board of Education

Direct Certification Home | ISBE HOME | LOGOUT

SESSION TIMEOUT 17:42

User Id: rramage RCDT: 35-050-1400-17 - Ottawa Twp HSD 140

Home

Direct Certification

SNAP/TANF/MEDICAID

File Upload Match

Single Child Match

CEP Validation File Match

Contact Us

Change RCDT

Step One

Download File

Each public school district LEA will have a download file named Annual. This file is created one time per year (early July) by ISBE to compare students enrolled in the Student Information System (SIS) with the current SNAP/TANF/MEDICAID/FOSTER file. Public school districts are encouraged to update student eligibility using the Annual file first.

A Monthly file is created for all public schools the first of the month for each month thereafter (September – June). The August file will compare to the previous school year SIS records. The September- June Monthly file will compare to the current school year SIS records. A zero record match may result from either no new matches or a district not having a current school year SIS record. Each Monthly file is NOT a cumulative file, and must be used in conjunction with the Annual Report.

If any LEA uploads a file with student information to match to the SNAP/TANF database, the download file(s) will be named Sponsor File with the appropriate date.

For each file, the LEA must maintain the documentation from the Printed Report. The option to Download the data is available to ease transfer of data into another computer program.

Students found in this manner are directly certified for free meal benefits. Direct Certification benefits are extending to other household members when the status is SNAP, TANF, or income Eligible MEDICAID. There is no extension of benefits for Foster eligibility status.

SNAP/Tanf/Medicaid Monthly/Annual Match Files

File Type	Approximate Number of Records	Match Date	Access Date	Download	Print
Sponsor File	360	07/11/2018	07/11/2018		
Sponsor File	360	07/11/2018	07/11/2018		
Annual	257	07/01/2018	07/02/2018		

Step Three

Step Two

Step Four: Update the current school year’s benefit issuance documentation with this information. USDA requires LEAs to identify those students directly certified by SNAP separately than those that are TANF, income eligible Medicaid or Foster children. ISBE recommends that LEAs maintain all types (SNAP, TANF, income eligible Medicaid or are Foster children) separately, if possible. Enter FREE eligibility for each child that appears on the *Annual* or *Monthly* match report currently enrolled in the school/district. These students do not need a Household Eligibility Application, and are approved for FREE meal benefits for the entire school year.

Sponsor File Upload Match - All Sponsors (Public and Private)

All sponsors may upload a comma-delimited file to the Electronic Direct Certification System (Detailed instructions to create a comma delimited file are provided later in this section). Once the file is uploaded, a *Sponsor File* is created identifying students on the sponsor-created upload file that are receiving SNAP, TANF, income eligible Medicaid or are Foster children. There are no limits to the number of files that may be uploaded to the Electronic Direct Certification System. All nonpublic sponsors, MUST conduct direct certification on all enrolled students. ISBE recommends a *Sponsor File Upload* match for this purpose, and to meet the requirement to conduct direct certification a minimum of three times each school year. A *Single Child Match* (discussed next) may also be used for this purpose, but ALL enrolled students must be checked at least three times as detailed above.

To utilize the Sponsor File Upload match, log into the *Electronic Direct Certification System* and follow the steps below. Before going into the Electronic Direct Certification System, LEAs will need to create their comma-delimited file; instructions are later in this section.

Step One: Select *File Upload Match* from the main menu on the upper left hand corner of the *Electronic Direct Certification System*.

Step Two: Select *Choose File* from the main menu on the lower right hand corner of the *Electronic Direct Certification System*. Select the comma-delimited file created for this upload and click *Open*.

Step Three: The file will appear in the *Select a File* area of the screen. Click *Upload*.

The screenshot shows the Illinois State Board of Education's Electronic Direct Certification System interface. The page title is "File Upload Match". The left sidebar contains a menu with "SNAP/TANF/MEDICAID" circled in red. The main content area includes instructions for file uploads, a list of required fields (First name, Last name, Gender, Birth date), and a "Select a File to Upload" section. In this section, the "Choose File" button is circled in blue, and the "Upload" button is circled in purple. Three callout boxes labeled "Step One", "Step Two", and "Step Three" point to these respective elements.

Step Four: The system will process the request. Once complete, users will automatically be taken to the *SNAP/TANF/MEDICAID* page. This process will take just a few minutes. The name of each file uploaded will be *Sponsor File* with the date and time. The most recent *Sponsor File* is the first file listed.

Step Five: Select *Print* to obtain a copy of the *Sponsor File*. The results of each search will appear on the screen. Exact and close matches will be displayed. View the list of students, to determine if a match is found.

Step Six (Optional): Select *Download* to obtain the *Sponsor File* in a format that may be uploaded to a Point-of-Sale (POS) Computer System or other system used to maintain eligibility information for the School-Based Child Nutrition Programs. For more information about downloading a file with the *Electronic Direct Certification System*, please reference the section of this guidance document titled *Downloading a File*.

Step Seven: Update the current school year’s benefit issuance documentation with this information. Enter FREE eligibility for each child that appears on the *Sponsor Report* currently enrolled in the school/district. A Household Eligibility Application is NOT needed for these students. Students are approved to receive FREE meal benefits for the entire school year.

Single Child Match - All Sponsors (Public and Private)

All sponsors can search for individual student(s) who may receive SNAP, TANF, income eligible Medicaid or are Foster children to determine FREE eligibility. An LEA may search using the first and last name with an optional city or via the case id number for SNAP, TANF, or income eligible Medicaid. The *Single Child Match* report will identify those students that the LEA selected. All students listed on the *Single Child Match* report receive SNAP, TANF, income eligible Medicaid or are Foster children and are eligible for FREE meal/milk benefits if enrolled in the school. There are no limits to the number of single child matches that an LEA may conduct. It is suggested that LEAs limit each *Single Child Match* report to eight students.

Step One: Select *Single Child Match* from the main menu on the upper left hand corner of the *Electronic Direct Certification System*.

Step Two: Select *Name and Address* or *Case Number* to search for an individual child. Enter the first and last name with an optional city or the case number. Click *Search*.

The screenshot displays the Illinois State Board of Education's web application. The top navigation bar includes the logo, the text 'Illinois State Board of Education', and user information: 'User Id: rramage RCDT: 35-050-1400-17 - Ottawa Twp HSD 140'. A left-hand menu contains links for 'Home', 'Direct Certification', 'SNAP/TANF/MEDICAID', 'Single Child Match' (circled in red), 'SNAP/Medicaid Elig Match', 'Contact Us', and 'Change RCDT'. The main content area is titled 'Single Child Match' and contains the following text: 'An LEA may look up a single student with the following search criteria: 1. first name, last name, and city. When you look up a single child by Name and Address, the first and last name are required fields. The city is an optional field. Lists with child(ren) that match exactly or that are close will appear. Each LEA must select the child(ren) that is (are) enrolled in their school by selecting the child(ren) from their search, select Edit Report to review the child(ren) or Print Report to print the report for your records.' Below this text is a 'Type of Search' section with two radio buttons: 'Name and Address' (selected) and 'Case Number'. A blue oval highlights this section. Below that is a 'Search Criteria' section with three text input fields: 'First Name *', 'Last Name *', and 'City'. A red asterisk indicates that 'First Name' and 'Last Name' are required fields. A 'Search' button is located at the bottom of the search criteria section. A blue box labeled 'Step Two' points to these search criteria fields. A red box labeled 'Step One' points to the 'Single Child Match' menu item in the left-hand navigation.

Step Three: The results of each search will appear on the screen. Exact and close matches will be displayed. View the list of children, and if a match is found (a child enrolled in the school), select *Add to Report*.

Close Matches

Step Three

Name	Address	Birth Date	Sex	Case Number/Identifier	Assistance Source		
		09/09/2016	F		SNAP	Add To Report	CLOSE
		05/16/2001	F		SNAP	Add To Report	CLOSE

Step Four: Once a child is added to a report, the following choices will appear: *Edit Report, Print Report, or Clear Report.*

- *Edit Report:* A list of the children added to the report will appear. From this screen, a child may be removed from the report.
- *Print Report:* Select *Print* to obtain a copy for school/district records. This is required for documentation of FREE meal/milk benefits.
- *Clear Report:* This selection will remove all children from the report.

Step Five: Update the current school year’s benefit issuance documentation with this information. Enter FREE eligibility for each child that appears on the *Single Child Lookup Report* currently enrolled in the school/district. A Household Eligibility Application is NOT needed for these students. They are approved to receive FREE meal benefits for the entire school year.

Using the Direct Certification Results

Flexibility in Determining the Effective Date

Children are eligible for free or reduced price benefits on the date their eligibility is determined. Flexibility exists to allow LEAs to move the effective date of eligibility back under various circumstances. ([SP51-2014 Eligibility Effective Date for Directly Certified Students](#)). LEAs processing applications or determining eligibility through direct certification while using this flexibility must do so consistently for all children, in all participating schools and Programs. LEAs electing to exercise this flexibility must notify ISBE via the online application submitted annually through WINS. To be used for this purpose, the data file must be generated and received by the LEA in the current school year.

If the LEA elects to exercise the flexibility, the LEA must:

- Do so consistently for all the direct certification methods described herein (i.e., automated data matching, letter method, and lists or other forms of documentation);
- Apply the direct certification eligibility effective date flexibility consistently to all students directly certified across all participating schools and school meal programs within the LEA;
- Document the effective date used, such as a date stamp, to document the date lists or letters from other agencies were received, or the documented and traceable run date of automated match files or recipient benefit files from another appropriate agency;

- If categorical eligibility is based on SNAP, TANF or income eligible Medicaid, the extended eligibility provision applies;
- Refund any money paid by or on behalf of the student for reimbursable meals or milk during the period from the free meal eligibility effective date through the date the direct certification is actually implemented at the local school, including forgiving accrued debt, for any meals or milk adjusted to free due to the change in effective date. The LEA can only claim those meals or milk at the free reimbursement rate if the student is given a refund or the debt is discharged; and
- Notify ISBE. This appears as a question on the sponsor questionnaire in WINS.

Extension of Benefits

All students that reside within the same household as a child that is directly certified based on SNAP, TANF, or income eligible Medicaid benefits are eligible for FREE meals/milk as well.

Extension of benefits does NOT apply to Foster children benefits.

Documentation

It is the responsibility of the LEA to have documents to backup the results of direct certification. [Documentation of this extension](#) of meal/milk benefits, as well as all direct certification reports must be maintained for three years plus the current, except that if audit findings have not been resolved, the records shall be retained beyond the three-year period as long as required for the resolution of the issues raised by the audit. The *Annual* report is for the entire school district not by school building. This report may need to be shared among all of the school buildings and may only be shared with those who work directly with certification of meal benefits. All records must be maintained in a confidential and secure manner. Additionally, each report will be dated to indicate the date in which a student's certification for FREE meals or milk can begin.

All of the reports will include:

- Student ID (Public Schools Only – Annual and Monthly Reports)
- Last, First, and Middle Name
- Birth date
- Gender
- School Name (Public Schools Only – Annual and Monthly Reports)
- Agency Identifier
- Street address
- City
- State
- Zip code
- Match Rule - *Exact Matches* (E) *Close Matches* (C)
- Assistance Source (SNAP, TANF, (income eligible) Medicaid or Foster)

All matches should be reviewed in order to determine students on the list are currently enrolled in the school and/or district. For the Annual Report, data gathered from SIS is from the previous school year; therefore, there could be students that match but no longer attend the school. For *Close Matches*, LEAs should be reviewing these matches to determine what data matches their student(s) information in order to determine which, if any, of the *Close Matches* are students enrolled in their school. If an LEA determines a student on the report is not enrolled in the school, indicate on the report in some way that that student is not enrolled in the school.

While every attempt to limit duplicate matches of students within the electronic direct certification system is made, if a duplicate record appears for a student (for example, the student is listed with both a SNAP case number as well as a foster child), SNAP benefits always take precedence. Please use the following as the hierarchy of assistance sources:

1. SNAP
2. TANF
3. Income-Eligible Medicaid
4. Foster (no extension of benefits)
5. Homeless (no extension of benefits)
6. Migrant (no extension of benefits)
7. Head Start (no extension of benefits)

Scenario One

The July *Annual* report is accessed and the student appears under the assistance source of Foster. The household is notified of the FREE meal eligibility. The school records reflect direct certification by Foster. On the September *Monthly* report, the same student is listed under the assistance source of SNAP. In this instance, the school records should be updated to reflect directly certified by SNAP. The household does NOT need to be notified, as meal benefits remain unchanged.

Scenario Two

A *Sponsor File* is created by the LEA. A student appears on the file duplicate times, under the assistance sources of TANF and SNAP. In this instance, the school records should be updated to reflect directly certified via SNAP. The household is notified of their eligible for FREE meal benefits and extension of benefits to additional household students should reflect directly certified by SNAP.

Once reports are reviewed, households must be notified that their child(ren) have been approved for FREE meal/milk benefits. A [sample notification letter](#) is available online. The Direct Certification Notification Letter will include the child(ren) located through the Electronic Direct Certification System as well as any child(ren) within the same family that are enrolled in the district that is providing benefits through the extension of benefits as detailed above.

Notification to the households regarding eligibility determined through the Electronic Direct Certification System is required. The LEA must notify the household that:

- The student(s) is/are eligible for FREE benefits;
- No further action is required including the completion of the Household Eligibility Application;
- Additional student(s) in the household may receive FREE meal/milk benefits through the extension of benefits provision of the USDA for SNAP, TANF or income eligible Medicaid, if the school is notified of such student(s); and
- Households should notify the LEA if the household wants to decline the meal/milk benefits.

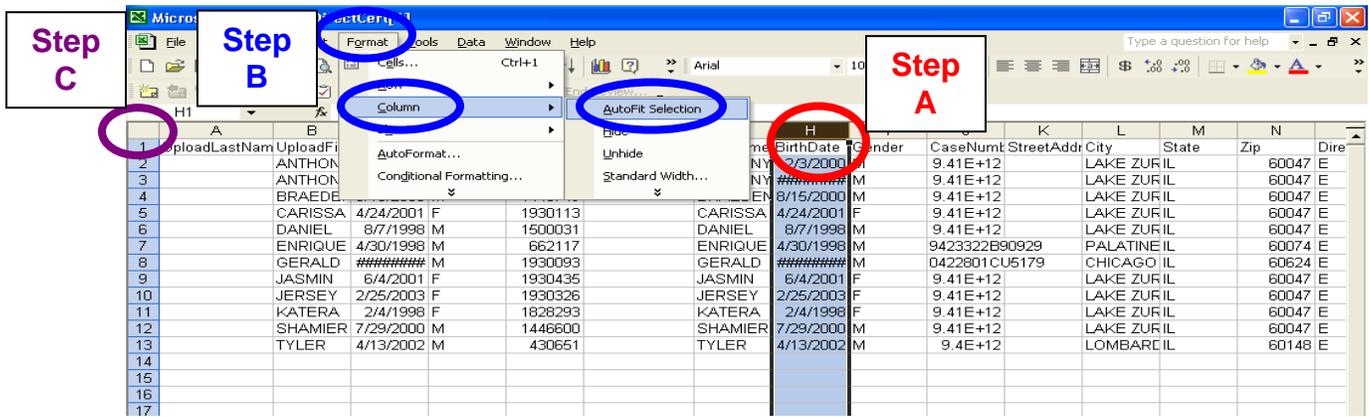
Households in which at least one student is directly certified and all students in that household are part of the same family **do not** need to be provided a Household Eligibility Application. For this purpose “family” is defined by the USDA as “a group of related or nonrelated individuals who are not residents of an institution or boarding house, but who are living as one economic unit.” There is a [sample form](#) for LEAs to document this extension of the categorically eligible SNAP/TANF/income eligible Medicaid benefits for FREE meal/milk benefits.

All directly certified students are eligible for FREE meal/milk benefits unless a parent/guardian requests to not receive those benefits. If a parent/guardian requests not to receive benefits for one or all of their children, we recommend such requests be made in writing with the signature of the parent/guardian as well as the date of such request. This will provide the necessary documentation as to why a student is not receiving the FREE meal/milk benefits. The child(ren) must be claimed in the category the parent/guardian has requested.

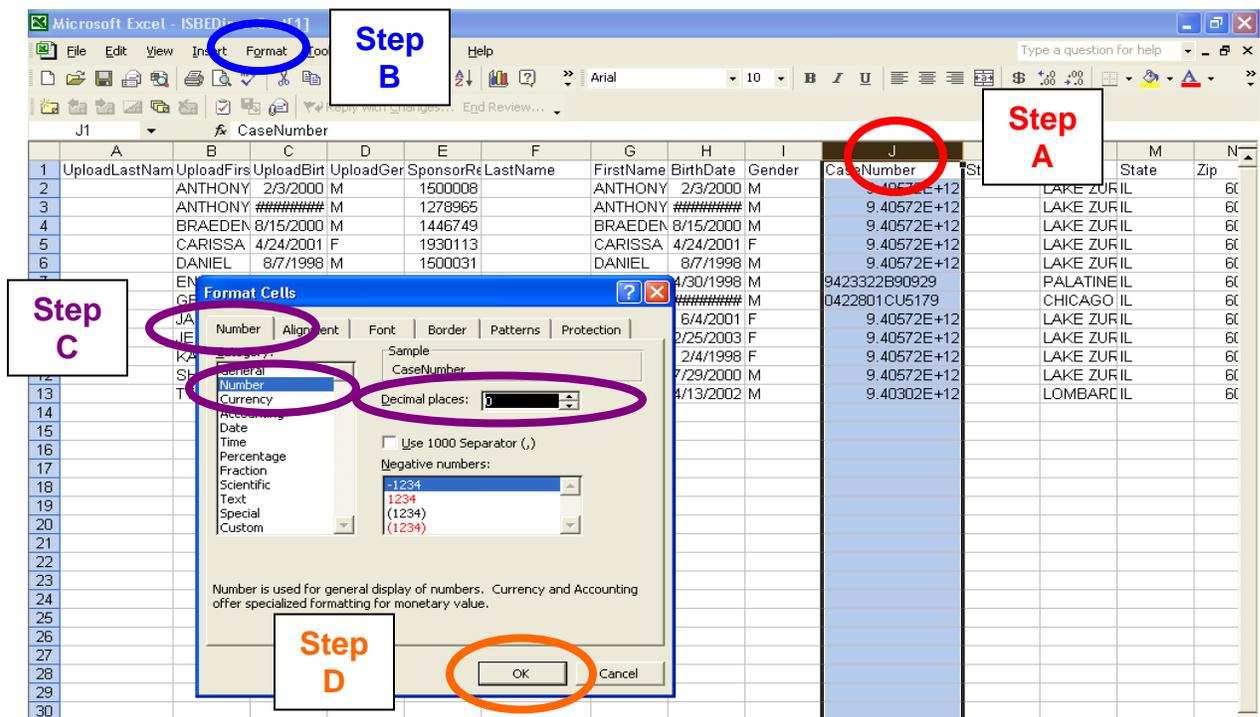
Downloading a Direct Certification File

If schools/districts choose to download a file in the Electronic Direct Certification System, *in* some instances, the information will be displayed in a format that must be modified. School technology staff can assist with most of these issues. A few of the common issues found are listed below:

- 1) The fields are symbols instead of numbers or the cells do not show the entire field of data.
 - a. This can be fixed for each column by highlighting the column to be fixed (place cursor over the letter at the top of the column, an arrow will appear, then click with the mouse to highlight that column).
 - b. Once the column is highlighted, select *Format* at the top of the screen, then select *Column*. Additional options will appear. Select *Auto Fit Selection*. The column will now display all data.
 - c. This can also be fixed for the entire sheet. Using the mouse, go to the upper left hand corner of the Excel sheet and click on the box between the letter A and the number 1; this will highlight the entire sheet. (See Step C.) Then follow Step B.



- 2) The Case Number (Column J) looks like symbols. To correct this problem follow the instructions below on the downloaded file before saving as Excel:
 - a. Highlight Column J (place cursor over the letter J at the top of the column, an arrow will appear, then left-click with the mouse to highlight that column).
 - b. Click *Format* at the top of the screen and click on *Cells*.
 - c. A *Format Cells* dialogue box will appear. Select *Numbers*. Under *Category*, select *Number*. Then modify the number of decimal places to zero.
 - d. Click *OK*.



How to Create a Comma-Delimited File

There are two options for creating a comma-delimited file. The first option is to use Microsoft® Excel and the second option is to use Notepad. Below are instructions for both options. Also keep in mind that the required fields are extremely case sensitive and will not download if any fields are entered incorrectly or out of order.

A common error found is that a header row, identifying each column of data, is included. For example, the first row will read First Name, Last Name, Gender, and Birth Date. The header row must be removed before saved as a comma delimited file for uploading.

EXCEL

Follow the steps below to create a comma-delimited file using Microsoft® Excel.

Step One: Open Microsoft® Excel.

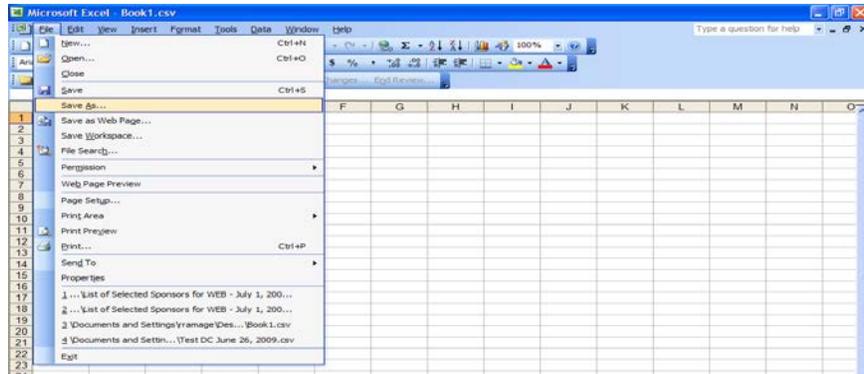


Step Two: Enter the required data. The file format is as follows:

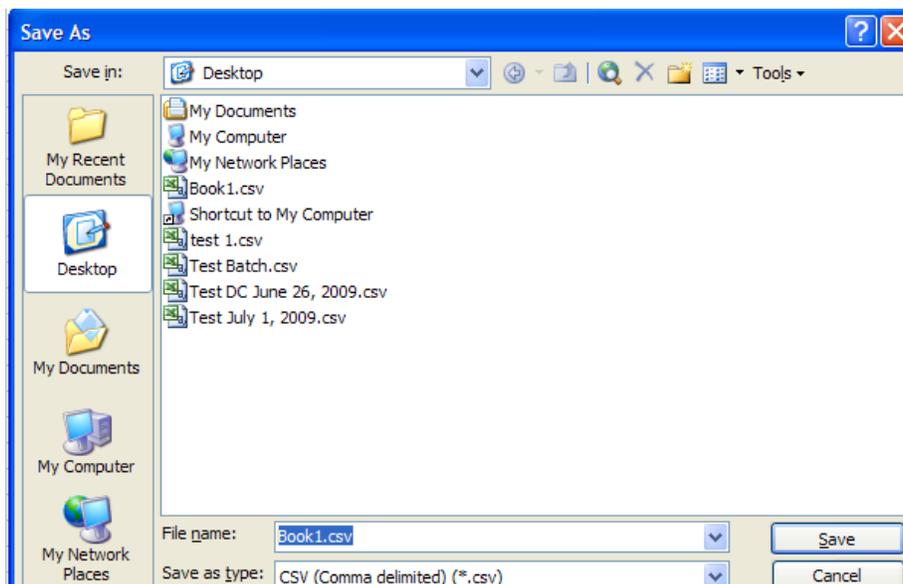
- Column A: First Name
- Column B: Last Name
- Column C: Gender (F = Female, M = Male)
- Column D: Birth Date (Month/Day/Year, 01/01/1970)
- Column E: Unique Identifier (Optional)
- Column F: Unique Identifier (Optional)

The number of students entered will vary by sponsor. Once the file contains all of the required data for all students to be uploaded, proceed to the next step. **NOTE:** File cannot contain a header row and must follow this format exactly.

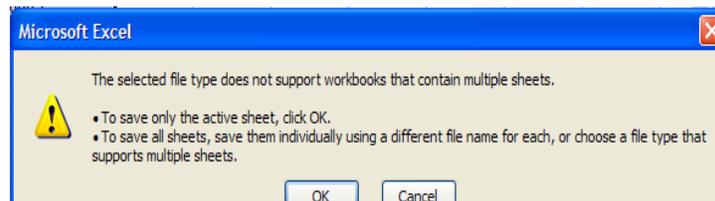
Step Three: Select *File, Save As* from the Excel menu.



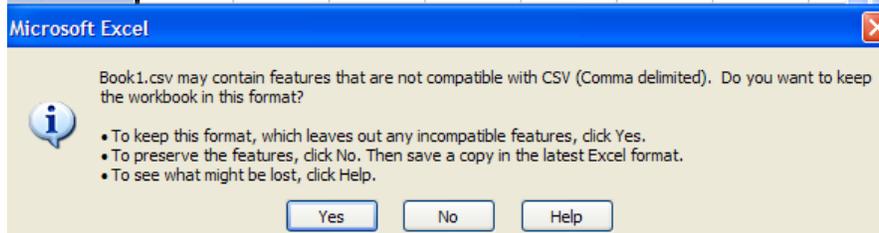
Step Four: Enter a file name as requested. For the *Save as Type*, select *CSV (comma-delimited) (*.csv)*, and then click *Save*.



Step Five: The following message will appear. Click *OK* to save only the active sheet.



Step Six: The following message will appear. Click Yes to keep the file in the CSV format.

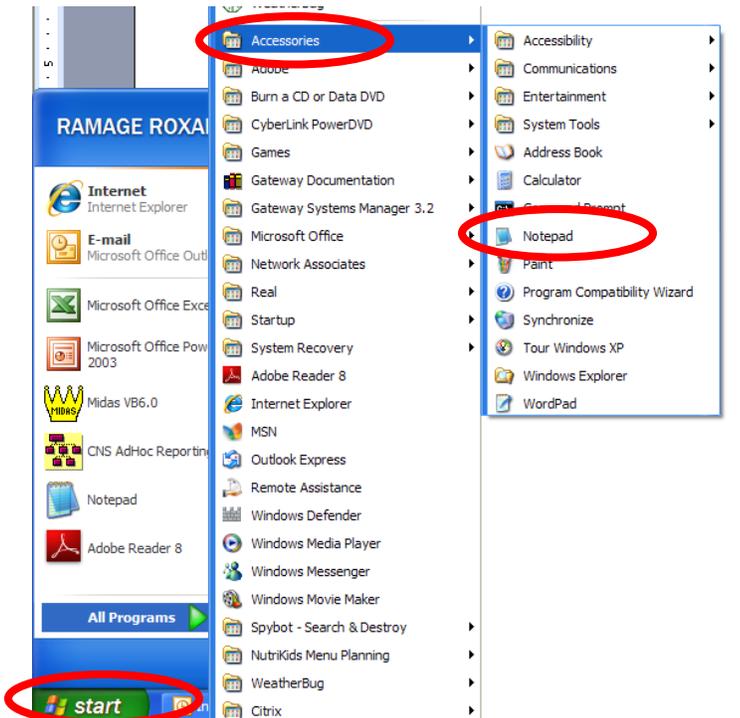


Step Seven: The file is now ready to upload to the Electronic Direct Certification System. Follow the directions for the *Sponsor File Upload* found in this Guidance Document.

NOTEPAD

Follow the steps below to create a comma delimited file using Notepad.

Step One: Open Notepad. It can be accessed by clicking on *Start, Accessories*, and then *Notepad*.



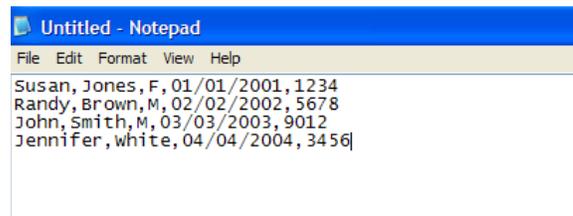
Step Two: Enter the required data. The file format is as follows:

First Name, Last Name, Gender (F = Female, M = Male), Birth Date (Month/day/year, 01/01/1970), Unique Identifier (Optional), Column E: Unique Identifier (Optional)

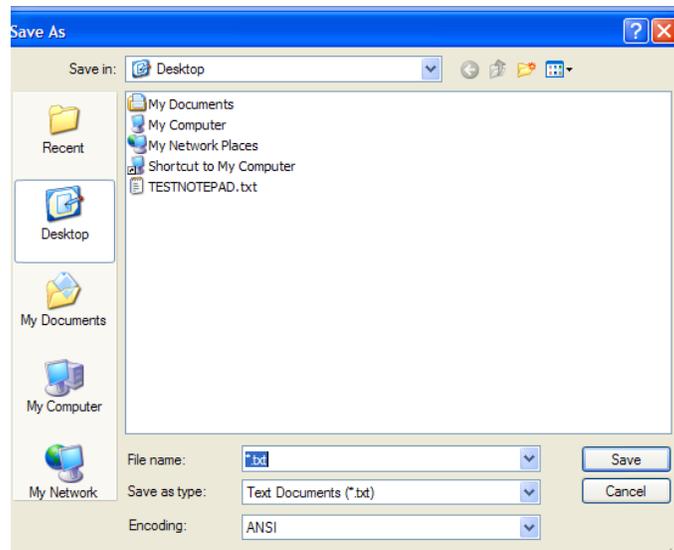
Example: Susan,Jones,F,01/01/2001,12345,LincolnElemSch

DO NOT include spaces in the file format.

After each record, select *Enter*.



Step Three: Enter a *File Name* and select *Save*. Make sure that the *Save As* type is *Text Documents (*.txt)*.



Step Four: The file is now ready to upload to the Electronic Direct Certification System. Follow the directions for the *Sponsor File Upload* found in this Guidance Document.

Certification of Eligibility

Processing of Household Eligibility Applications

Certification of Eligibility – Processing of Household Eligibility Applications

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Additional Resources

- Illinois Prototype Household Eligibility Application Materials - <https://www.isbe.net/Pages/Household-Eligibility-Resources.aspx>
- USDA Translated Household Eligibility Application Materials - <https://www.fns.usda.gov/school-meals/applying-free-and-reduced-price-school-meals>

Public Announcement

Near the beginning of each school year, the public must be notified that the National School Lunch Program, School Breakfast Program, and/or Special Milk Program are available in the school or school district. This notice must include the Income Eligibility Guidelines for free and reduced-price meals and/or free milk. The public announcement must be provided to the local news media.

The Illinois State Board of Education submits a statewide public announcement on behalf of all participating sponsors annually. However, local education agencies (LEAs) **must** submit public announcements to local employment offices and major employers contemplating large layoffs in the attendance area of the school. When submitting a public announcement for print, LEAs should request the announcement be free of charge. Copies of the public announcement must be made available upon request to any interested person. A prototype is available online.

Carryover of Previous Year's Eligibility

Schools are required to carry over eligibility determinations based on direct certification, categorical eligibility determinations and household eligibility applications from the previous year for either 30 operating days into the subsequent school year OR until a new eligibility determination has been made, whichever comes first. Carryover of the eligibility status from the previous year also applies to children in Head Start programs if the SFA administers both the Head Start Program and the school in which the child attends kindergarten. Carryover also applies to newly enrolled children from households with children who were approved for benefits within the same LEA in the previous school year.

If benefits provided to a student during the first 30 operating days of the school year based on the eligibility from the prior school year expire, a notice of adverse action is not required. However, an LEA may wish to provide some [notification](#) to such families.

Letters to Households

Prior to the distribution of the household eligibility applications (HEAs) to students in all participating NSLP schools, each LEA is required to implement direct certification. Please reference the [Electronic Direct Certification](#) section of this handbook for detailed information about that process and all of its requirements.

Near the beginning of each school year, the letter to household, household eligibility application (HEA) and application instructions announcing the availability of nutrition programs must be distributed to all households, EXCEPT students that are directly certified. Households with students that are directly certified do not need to be provided an HEA. An LEA may not only make available the HEA during registration, the HEA must be distributed to all households, except those directly certified. Distribution may occur by postal service, emailed to parents/guardians or included in packets of materials provided directly to the students or households.

Most schools utilize a paper HEA process, and as such, each household must be either provided the notification of benefits due to direct certification or be provided [a paper HEA](#) with letter to household and instructions included. It is NOT acceptable to post the HEA on a school district's website ONLY and require households to download and print the HEA for submission. While this is allowable, a paper HEA must still be distributed to all households not directly certified. LEAs enrolling new students after the start of the school year should search for such students in the *Electronic Direct Certification System*, but at a minimum must provide a letter to households, a HEA form and instructions to the household when they enroll.

If the LEA uses a computer or web-based system to receive and process applications, the letter must inform the household how to access the system in order to apply for benefits. The application and instructions are not required to be distributed if the LEA accepts the required information online and approves the applications via this system. Information about electronic applications must be reviewed by LEAs to ensure compliance with all USDA requirements prior to implementation. The letter must explain to the household how to obtain and submit a paper application, such as including a telephone number or form to return to request the paper application materials.

The USDA, Food and Nutrition Services, and ISBE **do not** evaluate, recommend, approve, or endorse any software used for certification or verification purposes. Therefore, if software is used to perform all or part of the certification or verification process, the LEA must assure the software used is performing correctly and meets all program requirements.

LEAs currently assisting Limited English Proficient (LEP) families as required under Title 6 of the Civil Rights Act of 1964 have a responsibility to be aware of the language needs of LEP households and ensure these households have access to the same information other parents have in a manner they can easily understand. LEAs are reminded that [translated free and reduced price application materials](#) are available online.

[Prototypes of a Letter to Household, application and instructions](#) are updated annually and made available to LEAs online. If a LEA elects **not** to use the state issued prototypes, they must submit all forms to ISBE's Nutrition Programs Division via fax at 217.524.6124 or scan and email to cnp@isbe.net for approval.

Eligibility Documents and Timelines

For each student served a meal or milk that is claimed for federal reimbursement at the free or reduced-price rate, the LEA must have the proper documentation on file per program requirements. Proper documentation includes: a completed HEA; OR, Direct Certification report indicating the child receives SNAP, TANF, income eligible Medicaid or Foster child status; OR documentation that they are a member of a household in which a child or adult is receiving SNAP, TANF, income eligible Medicaid, or Categorical Eligible listing from the district's homeless/runaway/migrant/Head Start/foster child coordinator or director.

Applications should be processed immediately, particularly for students who do not have approved applications on file from the previous school year. The household must be notified of the approval or denial of the application as soon as possible and no later than ten (10) working days from receipt of the application. If the HEA is approved, this notification may be provided verbally or in writing. If the HEA is denied, the notification must be in writing. A prototype [Denial/Approval Notification Letter](#) is available online.

Effective Date of Eligibility Determinations

The effective date of eligibility determinations is a flexibility option available to LEAs processing applications or determining eligibility through direct certification. LEAs using this flexibility must do so consistently for all children in all participating schools and Programs. LEAs must notify ISBE regarding what option is elected. This is done with the submission of the Sponsor Questionnaire submitted via WINS.

Children are generally certified eligible for free or reduced price meal benefits on the date the household application is approved. However, LEAs have flexibility concerning the effective date of certification for NSLP, SBP and SMP benefits. If an LEA chooses, it could establish the date of submission of an application as the effective date of eligibility, rather than the date the official approves it. A date stamp or another method to document the date the application was submitted must be used when this flexibility is applied to the application process.

LEAs must refund any money paid by or on behalf of the child for a reimbursable meal or milk during the period from the free meal eligibility effective date through the date the direct certification is actually implemented at the local school, including forgiving accrued debt, for any meals or milk adjusted to free due to the change in effective date. The LEA can only claim those meals or milk at the free reimbursement rate if the student is given a refund or the debt is discharged.

Eligibility for free and reduced-price school meals remains in effect for the rest of that school year. Households are not required to report changes in their eligibility status. However, households may voluntarily report a change. If a reported change reduces or terminates

benefits, the LEA must explain to the household that the change does not have to go into effect. If the household wants the change to go into effect, the LEA must provide a notice of adverse action.

Year-long eligibility does not apply when the initial eligibility determination was incorrect. This may occur if there was:

- A determination error,
- Verification of household eligibility that results in a required benefit change. This may be due to a response that does not support the level of benefits for which the household was approved or a non-response by the household,
- A household voluntarily reapplies for meal benefits, as their situation has changed.

Certification of Eligibility

Benefits can be issued using one of following methods:

1. Categorical Eligibility using the Electronic Direct Certification System. Students receiving *Supplemental Nutrition Assistance Program (SNAP)*; *Temporary Assistance to Needy Families (TANF) income –eligible Medicaid (began November 1, 2016)*; and *Foster children*. (This is discussed in the *Electronic Direct Certification* section of this handbook in detail.)
2. Categorical Eligibility using listing from Coordinator(s) – Homeless; Migrant; Runaway; Head Start; or Foster children. Between September 1 and June 30 annually, a direct certification report for Homeless, Migrant and Head Start is available in the Electronic Direct Certification System.
3. Household Eligibility Application (HEA)
 - Based on household income.
 - Based on valid SNAP or TANF case numbers provided on the application including the extension of such benefits to ALL household members. **Since income levels are not known when a household provides a Medicaid number on a HEA or displays a Medicaid card, it is NOT allowable for determining eligibility for meal programs.**

Categorical Eligibility

Homeless, Runaway, Migrant, and Head Start

Homeless, runaway, migrant, and Head Start students are categorically eligible to receive free meals in the NSLP and SBP. Documentation to substantiate free meal eligibility must consist of the student's name or a list of names; effective date; and the signature of the person providing

documentation such as a homeless education liaison, local shelter director, runaway and homeless youth service provider, a local migrant education coordinator, or Head Start director Illinois-funded pre-kindergarten program students are NOT categorically eligible.

A [sample form](#) to document homeless, runaway, migrant, and Head Start is available online. Between September 1 and June 30 annually, a direct certification report for Homeless, Migrant and Head Start is available in the Electronic Direct Certification System.

Foster Children

Foster children are categorically eligible to receive free meals in the NSLP and SBP. If a family marks *Foster Child* on an HEA, this status may be directly certified using the *Electronic Direct Certification System*. If not confirmed via the *Electronic Direct Certification System*, the HEA is processed at face value. Foster children could also be included on an income or SNAP/TANF application for the household they reside in. The foster child would be free due to categorical eligibility, the remaining children in the household would have their meal benefit level based on: Income and the total number of members in the household, with foster child(ren) included; OR based on a properly formatted SNAP/TANF ID number being provided.

Household Eligibility Application

LEAs are required to use HEAs. This means only one application from each household may be required. LEAs are prohibited from requesting separate applications for each child in cases where children attend different schools under the same LEA.

There are two types of Household Eligibility Applications, SNAP/TANF or income. Each will be discussed in detail below

SNAP/TANF Application

Due to the requirements of Direct Certification (discussed in detail in the [Electronic Direct Certification](#) section of this Handbook), LEAs should make every effort to utilize that system to its maximum potential. Doing so should minimize the number of HEAs a district receives from households in which a member of the household reports receipt of SNAP or TANF. If a SNAP/TANF HEA is submitted for a student NOT directly certified, it must include the following information:

- Student's name for whom the application is submitted,
- Signature of adult household member, and
- Valid **9 digits** SNAP or TANF case number of a member of the household (adult or child). HEAs cannot be accepted with Medicaid case numbers. Persons receiving Medicaid benefits only that are NOT directly certified for meal benefits **must** complete an income application.

In rare instances, a household may document a SNAP/TANF case number from another state, please contact ISBE for guidance in these situations.

Income Application

A HEA in which the households reports income must include the following information on the application:

- Names of all household members, including the student(s), with an indication of the school for whom the application is submitted,
- Current income information for each household member listing source of income such as wages, alimony, pension, worker’s compensation, etc. and the frequency in which the income is received (weekly, every two weeks, every other week, monthly, or annually),
- Signature of adult household member, and
- The last four digits of the social security number of the adult household member who signed the application or an indication that the household member does not have one. (The prototype application includes a check box for this purpose.)

If applications are complete, they are to be accepted at “*face value*” and may not be subject to up-front verification. If there are any inconsistencies regarding the eligibility information provided or information is missing, the LEA may contact the household to obtain additional information or resolve inconsistencies. If this contact is not successful, the HEA must be denied. The LEA should make reasonable efforts to contact the household in order to obtain or clarify the required information. The household may reapply at any time.

Determining Household Size

A household for purposes of determining eligibility benefits for the Child Nutrition Programs is a group of related or unrelated individuals who are not residents of an institution or boarding house but who live as one economic unit, and who share housing and/or significant income and expenses of its members. Generally, individuals residing in the same house are an economic unit. However, more than one economic unit may reside together in the same house. Separate economic units in the same house are characterized by prorating expenses and economic independence from one another. A foster child residing in a household may be included on the HEA and count as a household member for determining meal benefits.

Determining Current Income

Households must report current income on a Household Eligibility Application. Current income means income received by the household and the frequency in which it is received for the most recent period in which monies are received. If the current income is higher or lower than usual and does not fairly or accurately represent the household’s actual circumstances, the household may, in conjunction with LEA officials, project its annual rate of income based on the guidelines on *Special HEA Situations*.

Income is any money received on a recurring basis, including gross earned income, unless specifically excluded by statute. Specifically, gross earned income means all money earned before such deductions as income taxes, employee's social security taxes, insurance premiums, and bonds. Income includes, but is not limited to:

- **Earnings From Work**
 - Wages, salaries, tips, commissions and cash bonuses;
 - Net income from self-owned businesses including farms;
 - Strike benefits, unemployment compensation and workers' compensation;
 - Military basic pay and case bonuses and allowances for off-base household, food, and clothing (excluding combat pay, Family Subsistence Supplemental Allowance, and privatized household allowance. See *Military Benefits and Military Income*).

- **Public Assistance / Child Support / Alimony / Pensions**
 - Unemployment benefits;
 - Workers Compensation;
 - Supplemental Security Income (SSI);
 - Regular cash assistance from State or local governments;
 - Alimony payments;
 - Child support payments;
 - Veteran's benefits;
 - Pension;
 - Retirement Social Security (including railroad retirement and black lung benefits);
 - Private pension or disability benefits
 - Adoption assistance payments.

- **Any other income regularly received**
 - Income from trusts or estates;
 - Annuities;
 - Investment Income;
 - Earned Interest;
 - Net rental income;
 - Regular cash payments from outside household;
 - Cash withdrawn from savings; and
 - Any other money regularly available to pay for the child(ren)'s meals

Income Exclusions

Income that is not to be reported or counted as income in the determination of a household's eligibility for free and reduced-price benefits includes:

- Any cash income or value of benefits a household receives from any Federal program that excludes such income by legislative prohibition, such as the value of assistance provided under SNAP. A [complete listing of exclusions](#) is available online;
- Payments received from the Foster Care agency or court for the care of foster children;
- Student financial assistance provided for the costs of attendance at an educational institution, such as grants and scholarships, awarded to meet educational expenses and not available to pay for meals;
- Loans, such as bank loans, are only temporary and must be repaid;
- The value of in-kind compensation, such as housing for clergy or any other noncash benefit; and
- Occasional earnings received on an irregular basis; e.g., not recurring, such as payment for occasional baby-sitting or mowing lawns.

Income Eligibility

To determine if a household meets income eligibility requirements for benefits, school officials must compare the household size and the total household gross earned income (without deductions) to the current [Income Eligibility Guidelines \(IEGs\)](#).

If the household has only one income source, or if all sources are received in the same frequency (weekly, every two weeks, bi-weekly, monthly, or annually), no conversion factor is used. Compare the income or sum of the incomes to the published IEGs for the household size and frequency of pay to make the eligibility determination.

If the household reports income sources at more than one frequency (weekly, every two weeks, bi-weekly, monthly, or annually), the income needs to be converted. When income needs to be converted, all income must be converted to an annual total.

The conversion factors that must be used are as follows:

- Weekly x 52
- Every 2 Weeks x 26
- Twice a Month x 24
- Once a Month x 12

Do not round the values resulting from each conversion. Total all converted annual income as indicated on the application and then compare to the IEGs.

For all applications, the determining official must indicate category of eligibility (free, reduced-price, or denied), and sign and date the application. The household is notified of their eligibility. A sample [Denial/Approval Notification Letter](#) is available online. If a HEA is denied, the household must be notified in writing and such notice must include the reason for the denial of benefits, the right to appeal, instructions on how to appeal, and a statement that the household may re-apply for free or reduced-price benefits at any time during the school year.

Income Application Error Prone Guidelines

To assist with verification efforts, it is recommended that HEAs considered error-prone be marked in the box provided on the HEA. Error-prone applications are those applications with an income listed within \$100/month (\$1,200/year, \$50/twice per month, \$46.15/every two weeks, or \$23.07/week) above or below the free-eligibility limit or below the reduced-price eligibility limit.

Temporary Application

Temporary approval of an application is no longer permitted because of the year long duration of eligibility provision. If LEAs/schools are concerned with the authenticity of the information provided on an application, they may, on a case by case basis, verify the application for cause. (See more information about verification for cause in the [Verification Section](#) of the Administrative Handbook.)

Independent Review of Applications – Selected LEAs

LEAs designated by the State agency as demonstrating high levels of, or a high risk for, administrative error associated with certification and benefit issuance are required to conduct a second review of applications. LEAs are notified by ISBE of this determination on an annual basis. The second review must be conducted by an independent individual or entity that did not make the original eligibility determination. This individual or entity is not required to be an employee of the LEA, but must be trained on how to make application determinations.

A second review of applications requires a re-evaluation of the initial eligibility determination made by the original determining official, based on the information provided by the household on the application. The second review must determine whether the application is complete with:

- Signature of an adult household member;
- Last four digits of a Social Security Number (or an indication of “none”) for income applications;
- Names of all household members, including the children for whom the application is made; and

- Identification of:
 - The amount of income received by each household member for income applications; or
 - The applicable Assistance Program and program case number, for applications based on categorical eligibility with an Assistance Program; or
 - The applicable program, for applications based on Other Source Categorical Eligibility.

The second review also must confirm the application was correctly approved based on the current IEGs or accurate categorical eligibility information, as applicable.

In addition, the second review of applications must be completed before the household is notified of eligibility and must not delay the eligibility determination. LEAs required to conduct a second review of applications must still notify households of the child's eligibility determination within 10 operating days of receiving the application. For more information, see [SP 44-2014: Questions and Answers Related to the Independent Review of Applications](#).

Special Household Eligibility Application Situations

Adopted Child—An adopted child for whom a household has accepted legal responsibility is considered to be a member of that household. If the adoption is a subsidized adoption, the subsidy is included in the total household income.

Alimony and Child Support—Money consistently received by a household in the form of alimony or child support is considered as income to the receiving household. Money paid out for alimony or child support is NOT deducted from the household's reported gross income. If alimony or child support is not paid according to the court order/agreement, it is not counted as income for purposes of the Child Nutrition Programs.

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

Child Residing in an Institution—A child residing in a residential child care institution (RCCI) participating in the NSLP/SBP/SMP is considered a household of one.

Child Away at School—A child who is temporarily away at school (e.g., attending boarding school or college) should be counted as a member of the household.

Child Living with One Parent, Relative, or Friends—In cases when no specific welfare agency or court is legally responsible for the child or when the child is living with one parent, other relatives, or friends of the family, the child is considered to be a member of the household with whom he/she resides.

Child's Income—The earnings of a child who is a full-time or regular part-time employee must be listed on the application as income. However, intermittent earnings, such as income from occasional babysitting or mowing lawns, should not be listed on the application as income.

Commission-Based Employee—*See Seasonal Workers and Others.*

Deployed Service Personnel—*See Military Benefits and Military Income.*

Emancipated Child—A child living alone or as a separate economic unit is considered to be a household of one.

Family Members Living Apart—Family members living apart on a temporary basis are considered household members. Family members not living with the household for an extended period are not considered members of the household for purposes of determining eligibility, but any money made available by them or on their behalf for the household is included as income to the household. *See Military Benefits and Military Income.*

Foreign Exchange Student—A foreign exchange student is considered to be a member of the household in which he/she resides; i.e., the household hosting the student.

Foster Child—A foster child whose care and placement is the responsibility of the State or is placed by a court with a caretaker's household, is categorically eligible for free meal benefits. A household may complete the HEA or the LEA may obtain [a categorical eligibility listing](#) from an official with the foster care agency. Foster children can be included on the application of the household they reside in, if it benefits the household. In this situation the foster child will always be free due to categorical eligibility, the remaining children in the household will have their benefit level determined based on income and the total number of people in the household. A foster child who has been legally adopted becomes a member of the household in which they reside. *See Adopted Child.*

Garnished Wages and Bankruptcy—Income is the gross earned income (before deductions) received by a household. In the case of garnished wages and income ordered to be used in a specified manner, the total gross income must be considered regardless of portions being garnished or used to pay creditors.

Guardianship Situation—A student for whom a household has accepted legal guardianship for is considered to be a member of that household. If the guardianship is a subsidized guardianship, the subsidy is included in the total household income.

Head Start—**ALL** children participating in the federally funded Head Start are automatically eligible for free meals without further application or eligibility determination. **Children participating in the Illinois-funded pre-kindergarten programs are NOT automatically eligible for free meals.**

Homeless, Migrant, or Runaway Child—While Household Eligibility Applications are not required to certify a homeless, migrant, or runaway child, some applications may indicate the child is homeless, migrant, or runaway. A [listing of categorically eligible children](#) or a direct certification report is also acceptable.

Host Family of Homeless Students—When a host family applies for free and reduced-price meals for their own children, the host family may include the homeless family as household members if the host family provides financial support to the homeless family, such as shelter, utilities, clothing, or food. In such cases, the host family must also include any income received by the homeless family. However, free meal eligibility for the homeless child is based on the documentation provided by the local education liaison, even when the child is included on the host family's free and reduced-price meal application.

Households That Fail to Apply—Local officials may complete an application for a student known to be eligible if the household fails to apply. This option is intended for limited use in individual situations and must not be used to make eligibility determinations for categories or groups of children. When exercising this option, the school official must complete an application on behalf of the student based on the best household size and income information. The source of the information MUST be noted on the application. Names of household members, social security number, and signature of an adult household member are not required. These applications are excluded from verification. However, the household must be notified that the student has been certified to receive free or reduced-price meal benefits.

Households That Voluntarily Provide Pay Stubs That Conflicts with the Information provided on the Household Eligibility Application—The submission of documentation that does not support the information provided on the application must not affect the initial eligibility determination. The determining official must approve or deny the application on face value and notify the household of the initial eligibility determination. LEAs are in the best position to determine the appropriate action to take. Inconsistencies must be resolved quickly. Under these circumstances, an LEA official must take appropriate action by either:

- Sending the household a notice of approval and a notice of adverse action at the same time. This provides the household opportunity to resolve the discrepancy during the 10-day advance notice of adverse action.
- Sending the household a notice of approval and a verification letter (based on verification for cause) at the same time.

Incarcerated Individual—If temporary (less than one year), see *Family Member Living Apart*. If long term (more than one year), the individual would not be counted as a member of the household; however, any money to the household on their behalf is counted as income.

Institutionalized Child—An institutionalized child is a child who resides in a residential type facility that the State has determined is not a boarding school. Payments from any source

directly received by the institution on a child's behalf are not considered as income. Such a child is a household of one; therefore, only the income a child earns from employment and/or personally receives while in residence at the institution is considered as income. An RCCI may use a master list for residential children instead of collecting individual applications. The list should include the following information: name, date of birth, child's monthly income, date enrolled, and departure date ([ISBE Form 67-33](#)). If a child resides in a RCCI and attends a traditional school during the day, the RCCI must submit to the day school an application on behalf of the child which includes the following information: 1) the child's name; 2) the child's personal income and how often it is received, if any; and 3) the signature of an adult from the RCCI. The last 4 digits of the social security number is not needed.

Joint Custody—When joint custody has been awarded and the child physically changes residence, the child is considered part of the household where he/she resides. In these situations, if both parents apply for benefits in the same LEA for the child, and different eligibility statuses result, the greatest benefit level is used. For example, if the mother's HEA results in eligibility for free meals but the father's HEA is denied, the child would receive free meals. If only one parent applies for meal benefits, that household's level of benefits it provided to the student. A HEA from the other parent is not required.

Lump Sum Payments—Lump sum payments or large cash settlements are not counted as income since they are not received on a regular basis. These funds may be provided as compensation for a, such as payment from an insurance company for fire damage to a house. If lump sum payments are put in a savings account and the household regularly draws from that account for living expenses, the amount withdrawn is counted as income.

Military Benefits—In-kind benefit such as non-privatized on-base housing, where the household receives no cash is excluded as income. Military benefits received in cash, such as housing allowances for military households and food or clothing allowances must be considered as income. However, if the housing allowance is through the Military Housing Privatization Initiative, housing allowances are not to be counted as income.

Military Income— For deployed service members, only that portion of their income made available by them or on their behalf to the household will be counted as income to the household. Family Subsistence Supplemental Allowance (FSSA) is excluded as income. Deployment Extension Incentive Pay (DEIP) is excluded as income only until the service member returns to their home station. Combat pay that is received by the household member, who is deployed to a designated combat zone, is to be excluded as income. A combat zone is any area that the President of the United States designates by Executive Order as an area in which the U. S. Armed Forces are engaging or have engaged in combat. Combat pay is excluded on the application when **all three** of the following criteria are met.

1. Received in addition to the service member's basic pay;
2. Received as a result of the service member's deployment to or service in an area that has been designated as a combat zone; and

3. Not received by the service member prior to his/her deployment to or service in the designated combat zone.

Migrant Child—See *Homeless, Migrant, or Runaway Child*.

Overtime Payments— The LEA official should work with the household to determine whether the overtime for the month being reported is representative of overtime received in other months. If the overtime is a one-time or sporadic source of income, income should be calculated based on the regular monthly income without overtime. If regularly received, overtime is considered income, for purposes in Child Nutrition Programs.

Runaway Child—See *Homeless, Migrant, or Runaway Child*.

Seasonal Workers and Others—Seasonal workers, such as migrants or teachers on nine-month contracts, and others whose income fluctuates usually earn more money in some months than in other months. Consequently, the previous month's income will commonly distort the household's actual circumstances. In these situations, the household may project its annual rate of income and report this amount as its current income. If the prior year's income provides an accurate reflection of the household's current annual rate of income, the prior year may be used as a basis for the projected annual rate of income.

Self-Employed—Self-employed persons are credited with net income rather than gross income. Self-employed persons may use last year's income as a basis to project their current year's net income, unless their current net income provides a more accurate measure.

Net income for self-employment is determined by subtracting business expenses from gross receipts. Gross receipts include the total income from goods sold or services rendered by the business. Deductible business expenses include the cost of goods purchased, rent, utilities, depreciation charges, wages and salaries paid, and business taxes (not personal, Federal, State, or local income taxes). Non-deductible business expenses include the value of salable merchandise used by the proprietors of retail businesses.

Net income for self-employed farmers is figured by subtracting the farmer's operating expenses from the gross receipts. Gross receipts include the value of all products sold; money received from the rental of farmland, buildings, or equipment; and incidental receipts from the sale of items such as wood, sand, or gravel. Operating expenses include cost of feed, fertilizer, seed, and other farming supplies; cash wages paid to farmhands; depreciation charges; cash rent; interest on farm mortgages; farm building repairs; and farm taxes (but not local, State, or Federal income taxes).

For a household with income from wages and self-employment, each amount must be listed separately. When there is a business loss, income from wages may not be reduced by the amount of the business loss. If income from self-employment is negative, it should be listed as zero income.

Transfer Student—When a student transfers from one SFA to a different SFA during the school year, a copy of the eligibility determination documentation (HEA or Direct Certification) may be requested from the original school. The new SFA the students are transferring to is responsible for ensuring the eligibility determination is correct for each student. The SFA/school that transfers the student’s HEA to the new SFA/school, should keep the original for its own records. If the new SFA/school cannot obtain a copy of the HEA from the old SFA/school, then it should collect a new application from the household and make a determination of eligibility. It is also important to note that the decision to allow an SFA to accept a HEA from a different SFA is left to the new SFA to which the student is transferring.

Zero Income Application—When a household submits an application that indicates zero income or the income area is left blank, the HEA is processed as complete if all other applicable areas on the HEA are complete. The HEA is processed at ‘face value’ as eligible for free meals/milk.

Fair Hearing Requirements

Each LEA agrees to establish and use a fair hearing procedure for parents’ or guardians’ appeals of the school’s decisions on Household Eligibility Applications and for school officials’ challenges to the correctness of information contained in applications or to the continued eligibility of any child for free or reduced-price meal services or free milk. During the appeal and hearing, the child determined to be eligible based on the application submitted will continue to receive free or reduced-price meal services or free milk. Prior to initiating the hearing procedure, the parent or local school official may request a conference to provide an opportunity for the parent and school officials to discuss the situation, present information, and obtain an explanation of data submitted in the application and decisions rendered. Such a conference shall not in any way prejudice or diminish the right to a fair hearing.

The hearing procedure shall provide the following:

1. A publicly announced, simple method for making an oral or written request for a hearing
2. An opportunity to be assisted or represented by an attorney or other person
3. An opportunity to examine, prior to and during the hearing, the documents and records presented to support the decision under appeal
4. Reasonable promptness and convenience in scheduling a hearing and adequate notice as to the time and place of the hearing
5. An opportunity to present oral or documentary evidence and arguments to support a position without undue interference
6. An opportunity to question or refute any testimony or other evidence and to confront and cross-examine any adverse witnesses
7. That the hearing is conducted and the decision made by a hearing official who did not participate in the decision under appeal

8. That the decision of the hearing official be based on the oral and documentary evidence presented at the hearing and made a part of the hearing record
9. That the parties concerned and any designated representative thereof be notified in writing of the decision of the hearing official
10. That for each hearing a written record be prepared including the decision under appeal, documentary evidence, a summary of oral testimony presented at the hearing, the decision of the hearing official and the reasons therefore, and a copy of the notification to the parties concerned of the hearing official's decision
11. That such written record is preserved for a period of three years after the end of the fiscal year they pertain to and be available for examination by the parties concerned or their representatives at any reasonable time and place during such period

Child Nutrition Program Integrity

Misusing program funds, issuing benefits to households who are not entitled to them, or denying benefits to those who deserve them, lead to significant losses in program dollars and public confidence. If you are concerned that program funds are misused, contact the U.S. Department of Agriculture's Office of Inspector General at 800.424.9121 or at PO Box 23399, Washington, DC 20026-3399.

Confidentiality / Disclosure of Information

The SFA may disclose aggregate information to any program or individual, such as the number of children eligible for free or reduced-price meals. Collectively gathered information does not identify individual children; therefore, parental notification and parental consent are not needed.

Information provided on the HEA is used only for determining eligibility for meal or milk benefits and verification of eligibility. SFAs may disclose children's free and reduced-price meal eligibility information to programs, activities, and individuals as specified in the chart on the next page. This is an option, not a requirement.

Although a program or person may be authorized under the NSLA to receive free and reduced price eligibility information, there must be a legitimate "need to know" to provide a service or carry out an authorized activity. State agencies, LEAs, and schools must ensure that data systems, records, and other means of accessing a student's eligibility status are limited to officials directly connected with administration or enforcement of a Federal or State program or activity. This includes Federal, State, or local program operators responsible for the ongoing operation of the program or activity, or responsible for program compliance.

Eligibility information cannot be made available to all school officials. For example, access must be limited to a student's teachers who are directly responsible for the administration of a Federal education program, e.g., No Child Left Behind (NCLB), or who are providing tutorial or other assistance under NCLB. Teachers, guidance counselors, principals, etc. who are not providing such assistance under the appropriate statutory or regulatory requirements cannot have access. On-line data systems must have a masking or de-identification capability to prevent unauthorized access to free or reduced price eligibility status.

State Medicaid and SCHIP agencies and health insurance program operators receiving children's free and reduced price meal or free milk eligibility information must use that information only to enroll eligible children in State Medicaid or SCHIP.

SFAs that plan to disclose a child's eligibility status for purposes other than determining and verifying free or reduced-price eligibility must inform the child's household of this potential disclosure. Additionally, in some cases, the SFA must obtain parental consent prior to the disclosure. SFAs that anticipate disclosure specifically to Medicaid or the State Children's Health Insurance Program (SCHIP) must notify households of this potential disclosure and give households the opportunity to decline the disclosure. In Illinois, state law requires each SFA to share the eligibility status for purposes of enrolling children in the State Children's Health Insurance Programs, also known as All Kids, when asked. Disclosure rules are still applicable.

See the Eligibility Disclosure Chart on the following page which summarizes the type of eligibility information that may be disclosed by recipient type.

Disclosure Chart by What May Be Released Eligibility Disclosure Chart

Recipient of Information	Information That May Be Disclosed to Recipient
Programs under the National School Lunch Act (NSLA) or Child Nutrition Act	All eligibility information
Federal, State, or local law enforcement officials investigating alleged violations of any programs under the NSLA and CNA or investigating violations of the programs authorized to have access to names and eligibility status	All eligibility information
Comptroller General of the United States for purposes of audit and examination	All eligibility information
Medicaid or the State Children's Health Insurance Programs (SCHIP), administered by a State or local agency authorized by a State or local agency authorized under titles XIX or XXI of the Social Security Act to identify and enroll eligible children	All eligibility information, unless parents elect not to have information disclosed. Must give prior notice to parents and opportunity for parents to decline to have their information disclosed.
Federal/State or local means tested nutrition programs with eligibility standards comparable to the NSLP	Eligibility status only
Federal education programs	Eligibility status only
State education programs administered by a State agency or local education agency	Eligibility status only
State health programs other than Medicaid/SCHIP, administered by a State agency or local education agency	Eligibility status only
Local education programs	NO eligibility information unless parental consent is obtained
Federal health programs other than Medicaid/SCHIP	NO eligibility information unless parental consent is obtained
Local health program	NO eligibility information unless parental consent is obtained

Benefit Issuance, Meal Counting and Claiming

Benefit Issuance and Meal Counting and Claiming

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Additional Resources

- [USDA Memo SP 46-2016 Unpaid Meal Charges: Local Meal Charge Policies](#)

Note Regarding Senate Bill 2428

Illinois lawmakers, in both the Senate and House, passed Senate Bill 2428 as of 5/30/2018 and sent it to the Governor on 6/28/2018. At the time of printing of this Administrative Handbook, the bill is still pending action by the Governor. The Governor has 60 calendar days from the date sent to sign it, or to return it with his veto. If the Governor does nothing, the bill will automatically become a law after the 60-day period. If the Governor vetoes a bill that has been sent to him, the bill can still become law if the General Assembly overrides the veto by passing the bill again by a 3/5 vote in both houses.

If it becomes law, SB 2428 will create the Hunger-Free Students' Bill of Rights Act, which will affect portions of the guidance within this section. If this happens, ISBE Nutrition Division will revise this section of the Administrative Handbook and provide further guidance to sponsors at a later date.

We have highlighted portions of this section that will be impacted by this Act if SB 2428 becomes law.

SENATE BILL 2428 SYNOPSIS:

"Provides that every school in this State shall provide a federally reimbursable lunch to a student of that school who requests the lunch, regardless of whether the student has the ability to pay for the lunch or owes money for earlier lunches. Provides that if a student owes money for 5 or more lunches, a school shall reach out to the parent or guardian of the student to attempt collection of the owed money and to request that the parent or guardian enroll the student in a free or reduced-price lunch program. Provides that a school may not publicly identify or stigmatize a student who cannot pay for a lunch or who owes money for lunches. Effective immediately." [Read the full text here.](#)

Benefit Issuance

The benefit issuance process documents or determines how students are claimed on a daily basis. The benefit issuance document communicates the approved category (FREE, REDUCED-PRICE, or PAID) for each student based on an approved Household Eligibility Application, Direct Certification list, homeless and/or migrant liaison list, Head Start list, Even Start list, residential students in residential child care institutions (RCCIs) list, non-applicants approved by local officials, or another approved method. Listed below are some examples of benefit issuance documents:

- Rosters
- Tickets
- Tokens
- Bar code cards
- Student identification cards
- Verbal identifiers
- Biometrics

Benefit issuance documents must be updated when a change occurs on a student's approved benefits. Here are a few examples of changes to the approved eligibility that require benefit issuance changes:

- Verification findings
- Student transfers
- Household's decision to refuse meal benefits
- Reported change in household size, income, or receipt of SNAP/TANF benefits that would increase meal benefits

When a change occurs that increases meal benefits (i.e. reduced-price to free, paid to reduced-price, or paid to free), the SFA must put the change into effect no later than 3 operating days from the time of the new determination and the household must be notified in writing immediately. Schools should inform households that they may submit applications at any time during the school year.

Changes may occur that decrease benefits (i.e. free to reduced-price) or terminate benefits (i.e. reduced-price to paid, or free to paid) as a result of verification. Changes that decrease the meal benefits being received require that a notice of adverse action be sent to the household immediately. This notice must be sent 10 days prior to the actual reduction or termination of meal benefits. A sample [letter](#) that may be sent to households regarding increases or decreases in meal benefits as a result of verification can be found on the ISBE website.

If the meal benefits being received, based on categorical eligibility, decrease as a result of changes in a household's circumstances (e.g. increased income, loss of SNAP benefits, etc.), the change may not affect the meal benefits being received by the child due to the year-long duration of eligibility. Households experiencing changes in circumstances that would result in a decrease or termination of benefits do not have to be reported by the household. The SFA must explain to the affected household that the change in meal benefits is not required. A decrease in benefits will only go into effect if the household requests the change in writing, which could be done by submitting a new application. If meal benefits are decreased on a voluntary basis, the SFA must notify the household immediately with the following information and changes in eligibility status must be updated within 10 operating days:

- Written confirmation of the meal benefit changes
- An indication that the change was made at the request of the household
- An explanation of the household's right to continue receiving meal benefits, if the household so chooses

School food authorities are required to maintain a system to issue benefits and update the eligibility status of individuals. The system must accurately reflect current eligibility status in addition to changes in eligibility status made after the initial approval process.

Benefit issuance lists may be kept electronically. A system with one database may have multiple sites entering eligibilities that instantly update and reflect the changes of a student's eligibility status. Using a system with one database removes the potential for errors that can occur when using multiple databases.

Computer-based benefit issuance lists containing more than one database of approved student eligibility statuses must be updated to reflect a student's most current approved eligibility status, meaning systems must be synchronized after each change in benefit issuance to avoid errors in the edit check process and Claims for Reimbursement. These changes affect the number of eligibles, students by category, total number of adjustable eligibles, and meals permitted by the edit check per site. Systems with multiple databases are more complex if each site inputs their own approved eligibility statuses.

Denying, Delaying, or Changing Meals as Discipline

The USDA regulations set rules on the denial of meals and milk, delaying meal/milk services and changing of meals components as a form of discipline. Each area is discussed in more detail below.

- The denial of meals and milk as a disciplinary action against any child enrolled in a school participating in a federal Child Nutrition Program is prohibited. If the withholding of meals or milk is the disciplinary action or the disciplinary action *directly* results in the loss of meals or milk, it is not allowable (e.g., a student is suspended from school during the meal or milk

periods only). If however, the disciplinary action *indirectly* results in the loss of meals or milk, it is allowable (e.g., a student is suspended from school).

- Delaying meal/milk services is permitted as a form of discipline provided that no consequent discrimination against persons with disabilities or other protected groups occurs. Delaying meal/milk service as a disciplinary action may involve serving outside the normally designated period or serving in an unusual location, such as a classroom or detention area.
- Changing meal components is also permitted as a form of discipline, although not recommended by the USDA or the State Agency, provided that no consequent discrimination against persons with disabilities or other protected groups occurs. Changing meal components often takes the form of substituting peanut butter or cheese sandwiches for the normal entrée. The required components must still be served, and in Offer versus Serve situations, the full range of component choices must still be offered. This means schools may not provide only a three-item bag lunch. The menu planning approach is designed to meet overall nutrition guidelines over the course of a week. Adding, deleting or replacing food components may result in the menu not meeting weekly nutritional guidelines.

Replacement of Benefit Issuance Documentation

Depending on the benefit issuance documentation chosen, students may misplace or lose tickets, identification cards, etc. The USDA has issued specific instructions (FNS Instruction 765-7, Revision 2) regarding lost, stolen, or misused benefit issuance documentation. The purpose of this guidance is to assist sponsors in developing or revising district/school policies while ensuring compliance with federal regulations. District/school policies that limit the number of replacement benefit issuance documentation, must conform to the following standards:

1. Parents and students must be advised in writing of the district's/school's policy regarding missing benefit issuance documentation and of the students' responsibility for their benefit issuance documentation. Such notice shall be provided at the time applications are distributed to households or upon approval for free or reduced-price benefits.
2. A minimum of three benefit issuance document replacements or special meal arrangements resulting from three lost or stolen benefit issuance documents must be allowed to each student within one school year.
3. The school/district must maintain a list of students who have reported missing original benefit issuance document(s) in the current school year and the number of occurrences for each student. Prior to denying a meal to any student without benefit issuance documentation, the list should always be reviewed to determine if the student has already had at least three replacement documents or special meal arrangements for lost or stolen documentation in the current school year.
4. At least one advance written warning must be given to the student and the parent(s) prior to refusing to allow additional meals or replacement documentation. The written warning must

include an explanation stating the student has repeatedly requested replacement documents, he/she will be expected to either bring lunch or pay full price for lunch.

5. Meals must always be provided to preprimary, young primary, and any disabled students who may be unable to take full responsibility for benefit issuance documentation.

Benefit issuance may be communicated through an identification card that has multiple purposes, such as a school identification card. Below are specific questions and answers addressing automated cards and replacement costs, from the USDA.

Question: May a student who has lost an automated meal card be required to pay to replace it before receiving any more reimbursable meals?

Answer: No. A lost meal card is treated the same way as a lost meal ticket. School food authorities are to follow the policies in FNS Instruction 765-7, Revision 2, "Handling Lost, Stolen, and Misused Tickets." A free, reduced-price, or paid meal must be served, in accordance with the rules in the Instruction. If it is impractical to supply the student with an immediate replacement, then special meal arrangements should be made. As is stated in fiscal year 1994 School Programs Memorandum #3, "Recourse for Schools When Money Is Owed to the Food Service Account," school officials must provide reduced-price or paid meals to eligible children if they have money in hand to pay for the current meal.

Question: What is the maximum charge for a replacement meal card or ticket?

Answer: The USDA sets the maximum charge at the cost of one paid meal. However, if the card has multiple uses in addition to the purchase of meals—for example, if it is a student activity card—this limit does not apply.

School District Policy on Outstanding School Food Service Balances

In Illinois, policies on outstanding school food service balances are set at the school district level. Such policies must adhere to USDA regulations and instructions. All SFAs operating NSLP and/or SBP must have a written and clearly communicated meal charge policy in order to ensure a consistent and transparent approach. This policy must be communicated in writing to all households at the start of each school year and to households that transfer into the school district during the school year. Policies developed at the SFA level must be provided to the State agency during the Administrative Review.

Per the USDA, students eligible for REDUCED-PRICE and PAID meals must be provided a meal if they have money at the point of sale to pay for the current meal. Students eligible for FREE meals must be provided a reimbursable meal, regardless of money owed on à la carte items, second meals purchased, or meal charges accrued prior to certification. A child eligible for FREE

meals must be offered the same reimbursable meal options as all other eligible children regardless of their debt. The purchasing of à la carte items on an account which owes money should be handled according to the SFA-level policy.

Any collection procedures or resources available to the SFA may be used for the collection of debt, including collection agencies. SFAs are encouraged to consider whether the benefits of debt collections outweigh the costs acquired to receive those collections. Collection efforts should be directed at the legal guardians that are responsible for providing funds for meal purchases. SFAs are responsible for ensuring collection efforts do not impact the child of the household involved.

Policies must be implemented and followed consistently. To ensure overt identification is avoided, schools are encouraged to use the same procedures for all students regarding benefit issuance documentation, unpaid meal charges, and discipline.

Meal Counting and Claiming

To receive reimbursement, sites must accurately count, record, and claim the number of meals actually served to students by category: FREE, REDUCED-PRICE, and PAID. The number of meals served FREE, REDUCED-PRICE, and PAID claimed for reimbursement must have adequate documentation on file to support the claim.

Elements of an acceptable counting and claiming system include:

1. Eligibility Documentation

The SFA must have documentation to claim free or reduced-price meals for reimbursement. Documentation can be a Household Eligibility Application, Direct Certification list, homeless and/or migrant liaison list, Head Start list, Even Start list, list of residential students in RCCIs, non-applicants approved by local officials or another approved method.

2. Collection Procedures

The SFA must prevent overt identification at the medium of exchange to keep students' eligibility for free or reduced-price meals confidential.

3. Point-of-Service Counts

Meals must be counted daily at that point in the food service line where it can be determined that a reimbursable meal, containing all required components, has been served to an eligible student. It is NOT recommended that a student take point-of-service counts. Rather it is preferred that a trained adult, school employee or volunteer take the counts. Any alternative point-of-service counting methods must be approved by the Illinois State Board of Education Nutrition Division.

Meal count systems that are NOT ACCEPTABLE include the following:

- Attendance, tray, classroom, delivery, or entrée counts
- Cash converted to meals
- Category/cash back-out system
- Counts taken anywhere other than the point-of-service, such as the beginning of the service line
- Counts of tickets sold and distributed
- All cash line

Use of Biometric Information—for meal counting systems that use fingerprints, hand geometry, voice or facial recognition or any other student biometric information, Public Act 095-0232 requires the SFA to adopt a policy with the following items:

- Written permission to collect biometric information from the individual who has legal custody of the student or from the student if he or she has reached the age of 18. Failure to provide this written consent must not be the basis for refusal of any services otherwise available to the student.
- The discontinuation of use of a student's biometric information when the student graduates or withdraws from the school district, or if a written request for discontinuation is provided to the school by the individual who has legal custody of the student, or by the student if he or she has reached 18 years of age.
- The destruction of all of a student's biometric information within 30 days after the biometric information is discontinued through graduation, withdrawal, or a written request for discontinuation.
- The use of biometric information solely for identification or fraud prevention.
- A prohibition on the sale, lease or other disclosure of biometric information to another person or entity, unless consent is obtained from the individual who has legal custody of the student, or from the student if he or she has reached 18 years of age, or the disclosure is required by court order.
- The storage, transmittal and protection of all biometric information from disclosure.

4. Reports

The numbers of reimbursable meals served daily, by category of eligible students are recorded and reported by personnel trained to observe and record reimbursable meals. The meal counts must be reported in a manner that can be easily read, edited and consolidated into an accurate monthly Claim for Reimbursement.

The SFA must evaluate the meal counts for each site prior to submission of the Claim for Reimbursement, which is submitted through the ISBE Web-based Illinois Nutrition System (WINS). The [Meal Count Edit Form](#) (ISBE Form 67-37) may help an SFA identify and prevent errors in recording and consolidating meal counts.

- The process compares the daily number of free, reduced-price and paid lunches claimed for each site to the following:
 - Highest number of eligibles by category

- Attendance-adjusted eligibles for each category
- The meal count edit form also compares the monthly number of free, reduced-price and paid lunches claimed for each site to the maximum number of meals allowable to the total number of meals claimed by category.

The SFA shall promptly follow-up through phone contact, on-site visits or other means when the internal controls used by the school(s) or SFA for the claims process indicate the likelihood of meal count problems. When problems or errors are identified, the meal counts shall be corrected prior to submission of the monthly Claim for Reimbursement. Improvements to the meal count system shall be made to ensure that the meal counting system consistently results in meal counts of the actual number of reimbursable free, reduced-price and paid meals served for each day of operation.

5. Claim for Reimbursement

The monthly Claim for Reimbursement is submitted electronically by the SFA to the Illinois State Board of Education. Only the person authorized in ISBE’s Web Application Security (IWAS) may submit claims to ISBE. It is the responsibility of the authorized representative to ensure all policies and procedures and internal controls (on-site visits) are implemented to ensure the Claim for Reimbursement is accurate and supported by documentation.

6. Internal Controls

The SFA must establish internal controls to ensure an accurate Claim for Reimbursement has been made. Here are a few examples of internal controls:

- Segregation of duties
- On-site visits
- Reconciliation of production records to meals

It is impossible to describe every system in this manual. Each system has a number of variations and modifications unique to each site and/or SFA. Also, many of the systems can be used alone or together with other systems. Whatever the system implemented may be, it must prevent overt identification and provide accurate daily counts by category.

Does Your School Have an Acceptable Point-of-Service Meal Counting System?

Answer the following questions about your meal counting system. If the answer to any of these questions is *YES*, your counting system is **NOT** acceptable and must be revised.

1. Are claims based only on meal counts taken in the morning in the classroom or at any other location *before* the meal is served?
2. Are claims based on *attendance*?

3. Are meal counts based on the *number of tickets sold and distributed* or the *number of meals paid for in advance*?
4. Is the number of free and reduced-price *eligible students claimed*, instead of the number of free and reduced-price meals *actually served*?
5. Are meal counts by category taken at the *beginning of the serving line* without checking that the meals served are *reimbursable*?
6. Are meal counts by category based on *visual identification* of students with no backup system available (e.g., *checklists* for persons not familiar with the students)?
7. Are meal counts based on *tray, plate, or entrée* counts?
8. Are *back-out systems* that subtract a number from the total to get another number used?
9. Does the meal count system allow anyone other than *required staff* to know a student's eligibility category?
10. Is this a system that does NOT yield a *reliable, accurate count* of meals served by *category*?

Overt Identification and How to Prevent It

A system for claiming meals must prevent overt identification. This means the eligibility category of any child must be protected and known only by those school officials who deal directly with the counting and claiming system.

Codes on tickets or rosters are one method of preventing overt identification. A code must be difficult to recognize, but not so confusing the person taking the count has difficulty identifying the category.

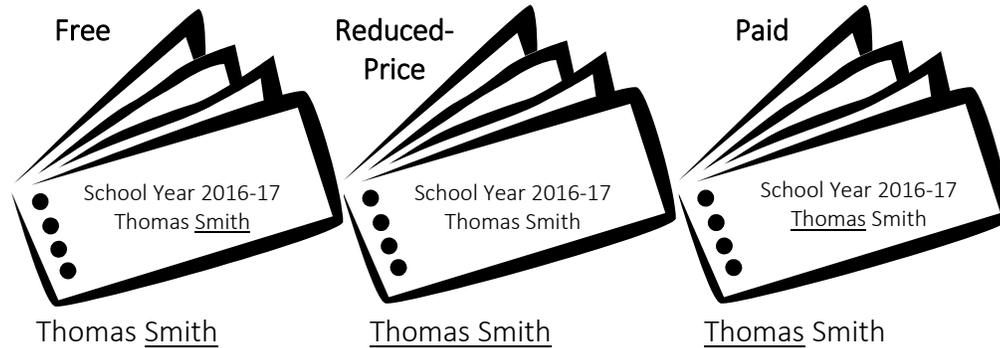
Some codes are prohibited by the USDA because they are too easily recognizable and therefore allow overt identification. These include the actual words "free," "reduced-price" and "paid" or the use of the letters "F," "R" or "P." In addition, the use of different colors for different designations is also prohibited. A single symbol code such as A, B, C or 1, 2, 3 is not recommended either. The multiple use of the same symbol such as AAA, BBB, or CCC is also not recommended.

Recommended codes are as follows:

- Codes by series—Use of four- or five-digit numbers in a series. For example, 1000–1999 for FREE, 2000–2999 for REDUCED-PRICE, and of 3000–3999 for PAID.
- Codes by student identification number—Use of the last digit of a student's identification number to represent the appropriate eligibility category. For example, use a number ending in zero to reflect free, those ending in an odd number to represent reduced-price, and those ending in an even number to represent paid.
- Codes by variations—Vary the placement of the students' enrollment dates or other items. For example, 10/2/16 could represent FREE, 10-2-16 could represent REDUCED-PRICE, and 10.2.16 could represent PAID.

- Codes by subtle differences—Use different print styles, spacing, or underline a different part of the student’s name or other information to represent different categories. For example, underlining the student’s last name might represent FREE, underlining the whole name might represent REDUCED-PRICE, and underlining the first name might represent PAID.

See the sample tickets for Ima Hungry Middle School:



- Codes by number of digits—vary the length of coded numbers by category. For example, FREE is represented by four-digit numbers, REDUCED-PRICE by five-digit numbers and PAID by six-digit numbers.
- Roster (also known as a checklist, master list or lunch list) codes—a roster used to take the count in the lunch room may also be coded in any of the above ways. A coded roster aids in counting the daily number of FREE, REDUCED-PRICE and PAID meals served per classroom, so spaces for these daily numbers must be allowed on the roster.

Verification

Verification

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Additional Resources

- [ISBE Verification Information Website](#)

Pre-Verification Procedures

Use of Direct Certification System

Prior to beginning the verification process, **all LEA's are required to have accessed and used the electronic direct certification** system available through IWAS/WINS. Public schools must access and use the *Annual File*, and subsequent *Monthly Files* to directly certify students. Private schools must use either the *File Upload Match* or *Single Child Match* options to meet this requirement.

On October 1, **districts must attempt to direct certify as many students as possible that are currently on applications.**

Use of the electronic direct certification system is done prior to the application count that must be done on October 1.

Students that are able to be direct certified will no longer need to have their application included in the October 1 application count. The reduction of total applications will reduce the number of applications that must be verified.

Please refer to the *Electronic Direct Certification* section of this handbook for further information.

Verification Requirements

Verification is the confirmation of eligibility to receive free and reduced-price meals under the National School Lunch and School Breakfast Programs. Verification is only required when eligibility is determined through the use of a paper or electronic household application, not through direct certification or for students determined to be categorically eligible. Verification must include either confirmation of income eligibility or that a member of the household being verified is receiving SNAP, TANF, or other directly verifiable status.

Verification Time Line

- October 1, Prior to Application Count – Attempt to direct certify students currently receiving benefits based on a household eligibility application.

- October 1, After use of Electronic Direct Certification System – Count all approved household applications on file, by category, and begin verification process. This includes *Income, SNAP/TANF, or Foster Child* applications.
- Last Operating Day of October – Count of **all** eligible students by category (Categorically eligible, free based on SNAP/TANF, free based on income, reduced based on income). LEAs will need to be prepared to provide student counts
- November 15 (on or before) – LEAs must have completed verification process.
- December 15 (on or before) – Submit Verification Summary Report (VSR) to ISBE. LEAs must submit a VSR.

Exceptions from Verification Process –

- Schools/RCCIs in which **ALL** students have been directly certified, including students documented as being foster, migrant, runaway or homeless
- RCCIs that **do not have any** day students
- Districts in which **ALL** sites participate in the Community Eligibility Provision (CEP)
- Districts in which **ALL** sites only participate in the Special Milk Program and/or Illinois Free meal programs
- Districts in which **ALL** sites serve students with no separate charge for food and no cash assistance is claimed; i.e., non-pricing programs claiming paid rate of reimbursement
- Districts in which **ALL** schools participate in Provisions 1, 2, or 3 except in those years in which applications are taken for all students in attendance; i.e., the base year
- Districts that **do not have any** free or reduced price eligible students

Steps for Completing Verification

Step 1: Select Sample

The sample size is based on the total number of approved applications: *Household Size/Income; SNAP/TANF; OR Foster Child*. Application count does not include students in split-session pre-k or kindergarten programs that are only participating in the Special Milk Program.

Standard Sample Size –

The lesser of 3 percent **OR** 3,000 of **all** approved household applications on file as of October 1. Applications must be selected from income based error-prone* applications first. If there are not enough error-prone applications to comply with the required sample size, LEAs may

randomly select additional applications to fulfill the 3 percent **OR** 3,000 application requirement from all remaining approved household applications.

- * **Error-prone applications** are those applications with a total household income listed within: \$23.07 per week; \$46.15 per every two weeks; \$50 twice per month; \$100 per month; OR \$1,200 per year, **above or below** the FREE income eligibility limit; OR, **below** the REDUCED income eligibility limit. [Income eligibility guidelines](#).

EXAMPLE:

An LEA has 200 approved *Household Size/Income, SNAP/TANF, or Foster Child* applications on file as of October 1. Six applications will need to be verified (3 percent of 200). These 6 applications must be selected from income based error-prone applications first. If there are not enough error-prone applications, the remaining applications may be selected randomly from all remaining approved household applications. **When calculating sample size, LEAs must round ALL numbers up to the next whole number.** For example, 1.12 = 2, 7.48 = 8, etc.

**LEAs cannot verify more or less than the required sample size.
LEAs are NOT allowed to verify 100% of all approved household applications.**

Step 2: Conduct Confirmation Review

Once the verification sample has been selected, LEAs must designate a Confirming Official to conduct a confirmation review on each application selected for verification. The confirmation review is done to check the accuracy of the initial determination of benefits on the household application. This step must be done prior to contacting households regarding their selection for verification. The Confirming Official must be someone other than the Determining Official.

LEAs may choose to confirm **all** household applications, but the minimum requirement is to confirm those selected for verification. LEAs that confirm any other amount of apps (every 5th, 10th, 20th) would not be in compliance with USDA requirements.

If through the confirmation review, the initial determination of the application is found to be:

- Correct – **Proceed to Step 3: Complete Verification.**
- Incorrect – **Status should be changed from free to reduced-price.**
 - Do not change benefit level or notify the household until verification is completed.
 - Proceed with Step 3: Complete Verification.

- **Incorrect – Status should be changed from reduced-price to free.**
 - Make the increased benefits available immediately.
 - Notify the household of the change in benefits. The sample letter *We Have Confirmed Your Application* should be used.
 - Proceed with Step 3: Complete Verification.

- **Incorrect – Status should be changed from free or reduced-price to paid.**
 - Immediately send the household a notice of adverse action. The sample letter *We Have Confirmed Your Application* should be used.
 - Do not verify application.
 - Select another application for verification. If an error-prone income application is terminated because of the confirmation review, then the LEA should select another error-prone income application as a replacement; new income application for income application; or new SNAP/TANF application for SNAP/TANF application.
 - Confirmation review must be done on newly selected application.

The Confirming Official may mark (CO:) and sign on the household application below the determining official's signature or complete the [Confirmation Review and Verification Form](#) (68-21) and attach to the reviewed applications.

Decline to Verify Option

After completing the confirmation reviews, the LEA may, on a case-by-case basis, replace up to five percent of applications in the selected sample. Applications may be replaced when the LEA believes the household would be unable to satisfactorily respond to the verification request; i.e., language barriers, family moves frequently, etc.

Any application removed from the sample under this option must be replaced with another approved application of the same type as the declined application. For example, a declined error-prone income application should be replaced by another error-prone income application. If there are no more error-prone income applications, select one randomly from all remaining approved applications that were on file as of October 1. The newly selected application must then go through a confirmation review.

In those LEAs where five percent of the total applications results in less than one application, one application may still be replaced. All results of the five percent calculation are rounded up to the next whole number.

Step 3: Complete Verification by Direct OR Standard Verification Procedures

Direct Verification Procedures

An additional feature of the Electronic Direct Certification system available in IWAS/WINS is the *Direct Verification* option. The use of Direct Verification option can speed up the verification process for LEAs, and may eliminate the need for LEAs to contact households that were selected for verification.

Direct verification SHOULD be the LEA's first step to verify ALL household applications that have been selected for verification.

ALL household applications selected for verification, whether originally approved based on income (FREE or REDUCED), SNAP/TANF, or Foster Child, can be attempted to be directly verified by using the Direct Verification link. If **any** household member (student or not) listed on the household application is verified to be receiving SNAP/TANF/free Medicaid benefits, then all school-age members of that household that are attending a school participating in the NSLP are then verified to be eligible to receive free meals.

If **any** household member (student or not) listed on the household application is verified to be receiving reduced Medicaid benefits, then all school-age members of that household that are attending a school participating in the NSLP are then verified to be eligible to receive reduced meals.

In the case of income applications, whether approved for FREE or REDUCED benefits, LEAs can use the Direct Verification link to search for students listed on household applications selected for verification. There may be situations where families applied based on income, not fully understanding the benefit of using a SNAP/TANF ID number; OR may have applied and been approved for SNAP/TANF/Medicaid benefits after the original income application date.

Any household application(s) selected for verification that are verified to be eligible for FREE benefits through direct verification, do not require any contact or requests for information from the household.

EXCEPTIONS:

- 1) Households originally approved for REDUCED benefits that are verified to be eligible for FREE benefits through direct verification, must be sent a *We Have Verified Your Application* letter, notifying them of the change in benefit level.
- 2) Households originally approved for FREE benefits due to a 9-digit number provided on an application that was not found to be Directly Certified, must be sent *We Have Verified Your Application* letter, notifying them of the change in benefit level. The household must

be provided the opportunity to reapply for meal benefits based on household income and size. Household Eligibility Applications received as a result of the change in benefit level due to direct verification must provide documentation to support the income reported on the application. Results of verification of this application must be reported in the Verification Summary Report. Households eligible for reduced benefit must be reported as Directly Certified reduced Medicaid. Households eligible for free benefits must be reported as free benefits and no change of benefit level.

When using the Direct Verification link, LEAs will need to enter in the *Application Date* and either the SNAP/TANF *Case Number OR Name and Address/City* of **any** child's name that is listed on the household application.

The Direct Verification link becomes available on, or about October 1, of each year, and will remain accessible through March.

To directly verify a SNAP/TANF application using case ID number:

The screenshot shows the Illinois State Board of Education website's Direct Verification page. The header includes the state logo and navigation links like 'Home', 'Direct Certification', and 'Download Files'. The main content area is titled 'Direct Verification' and contains instructions for using the system. It explains that the system is used for verification of selected applications from the October 1 sample. It also states that if at least one student is matched through the link, the application is considered verified. Below the text, there are search criteria options: 'Type of Search' with radio buttons for 'Case Number' (selected) and 'Name and Address', and 'Search Criteria' with input fields for 'Application Date' (with a calendar icon and 'mm/dd/yyyy' format) and 'Case Number'. A 'Search' button is at the bottom of the form.

SNAP/TANF Search Results

When there is a match, any child associated with the number entered will appear on the screen. As with the electronic Direct Certification system, click *Add to Report* for the appropriate student(s). Once the appropriate student(s) are added to the report, click the *Print Report* button. This report will serve as confirmation that verification has been completed.

Searches performed that provide no matches will result in a **No Matching Records Found** message being displayed.

If LEAs are unable to find a match using the SNAP/TANF number provided by the household, a second search should be done using name and address.

To directly verify an Income, SNAP/TANF, or Foster Child application using student names:

The screenshot shows the Illinois State Board of Education website. The header includes the logo and name of the Board of Education, the user ID 'cmartel', and the RCDT. A left-hand navigation menu lists options like Home, Direct Certification, Download Files, File Upload Match, Single Child Match, Direct Verification (highlighted), Contact Us, and Change RCDT. The main content area is titled 'Direct Verification' and contains explanatory text about the system's use for verifying household eligibility applications. It lists search criteria: 1. SNAP/TANF case number or 2. First name, last name, and city. Below this is a search form with a 'Type of Search' section (radio buttons for 'Case Number' and 'Name and Address', with 'Name and Address' selected) and a 'Search Criteria' section with input fields for 'Application Date', 'First Name', 'Last Name', and 'City'. A 'Search' button is at the bottom of the form.

Name and Address Search Results

When searching by *Name and Address/City*, the system may return a number of matches based on variations in spelling of the name entered. Entering the city is optional, but using it should reduce the number of matches. LEAs should try searching for all household members listed on the application, not just those enrolled in the school or district.

When multiple names are returned, LEAs should closely examine the list to ensure the correct student(s) have been found. Once the correct student(s) are found, click *Add to Report* for the appropriate student(s). When the appropriate student(s) are added to the report, click the *Print Report* button. This report will serve as confirmation that verification has been completed.

Searches performed that provide no matches will result in a **No Matching Records Found** message will be displayed.

If information obtained through direct verification of a household application indicates a student is participating in the SNAP, TANF, or other program, no additional verification is required.

Household applications selected for verification that are **UNABLE** to be directly verified, must be verified using the *Standard Verification Procedures*.

Standard Verification Procedures

Household applicants selected for verification that cannot be directly verified must be sent a letter informing them of their selection.

The *We Must Verify Your Application* letter must include the following information:

- That the household was selected for verification;
- That the household must list all adult household members. Adult household members are **NO LONGER REQUIRED** to provide all or part of their social security number.
- Types of acceptable information needed to complete verification, including pay stubs, social security, support payment decrees, etc;
 - **OR**, in place of income information a household may provide proof that a member of the household being verified receives SNAP/TANF benefits. **Please see** direct verification option.
- That documentation of income or receipt of SNAP/TANF benefits can be provided for any point in time between one month prior to the date of application and the time the household is requested to provide income or SNAP/TANF documentation;
- That information must be provided by a specified date, and failure to do so will result in termination of benefits;
- LEA contact name and telephone number that households may call for assistance regarding the verification process. The call must be free to all households. LEAs may establish a toll-free number, allow households to reverse phone charges, or provide different telephone numbers for each local calling area within the district; and
- A Privacy Act statement.

Income Applications – Acceptable Documentation

Acceptable written evidence for income eligible households must contain the name of the household member, amount of income received, frequency received, and the date the income was received. For example, a pay stub with no dates would be insufficient. Households must submit adequate documentation to allow an accurate determination to be made. If a member of the household is self-employed and submits a tax return from the previous year to document income, net income should be used.

SNAP or TANF Applications – Acceptable Documentation of SNAP or TANF Applications

Acceptable documentation from households includes: A letter on IL Department of Human Services (IDHS) letterhead and signed by family caseworker stating the household member(s) SNAP or TANF number; Or, a monthly statement from IDHS reflecting the type of benefits received by the household.

Required Follow-Up Contact

If the household does not respond, or responds inadequately to the **first** request for verification materials, **the LEA must make at least one additional attempt to obtain documentation of**

eligibility. This second follow-up attempt can be made by mail, telephone, electronic mail, or through personal contact. LEAs must inform households that failure to comply with verification will result in termination of benefits, and must document all contacts.

When is Verification Complete?

The verification process is considered complete when a household:

- Submits all required information to support original household application as submitted. Evidence provided verifies current meal benefit level.
- Indicates, verbally or in writing, that it will not comply with verification request or that they no longer want to receive free or reduced-price meal benefits.
- Submits all required information based on household application as submitted. Evidence provided requires a change, reduction, or termination of benefits.
- Does not respond or comply within required timeframe. Non-compliance results in a termination of benefits.

Step 4: Notify Household

Once the verification process is completed, all household must be notified of the results. The *We Have Verified Your Application* letter should be used.

If verification results in:

- **No change to the benefit level**, notify the household.
- **Increased benefits (reduced-price to free)**, notify the household and change the benefits of all children in the household no later than three operating days from the time of the new determination.
- **Decreased or terminated benefits (free to paid, reduced-price to paid, or free to reduced-price)**, notify the household providing them the required ten-calendar-day written advance notice. The first day of the ten-calendar-day written advance notice is the day the notice is sent. Households that are subject to a decrease or termination of benefits may request a hearing.

If the household requests a hearing during this ten-calendar-day period, the LEA must continue to provide benefits for which the child was originally approved until a hearing is held. The hearing official must be an individual who was not a part of the approval or verification process.

- If the hearing official rules that benefits must be reduced or terminated, the reduction or termination of benefits must take place within ten operating days after the hearing official renders the decision.
- If the hearing official rules that benefits must be increased, the increase in benefits must take place within three operating days after the hearing official's decision.

If the household does not request a hearing during this ten-calendar-day advance notice, the reduction or termination of benefits must take place no later than ten operating days after the ten-calendar-day advance notice.

Households that Reapply

Households affected by a reduction or termination of benefits may reapply for benefits at any time during the school year. However, if benefits to a household have been terminated as a result of verification and the household reapplies in the same school year, the household is required to submit income documentation or proof of participation in SNAP or TANF at the time of reapplication. In this instance, the LEA should verify the households' eligibility prior to approval of the household application. These are not considered new applications and the guideline of approving based on face value **does not** apply.

SAMPLE Timeline for Steps 1 through 4

- October 1 – Application count completed after direct certification was performed.
- October 2 – Sample size calculated based on October 1 application count, and applications to be verified are pulled and a confirmation review is performed.
- October 3 – Direct verification is attempted for those applications selected. Those applications unable to be directly verified are sent notification of their selection for verification. **Households have 10 calendar days to comply** with this first request.
- October 13 – Households that did not comply with first request must be sent a second notice. **Households have 3 business days to comply** with this second request.
- October 16 – Households that did not comply with the second request are sent a letter notifying them that their benefits are being terminated. Benefits will be terminated 10 calendar days from the date notification is sent. In this example the letter is sent on October 16 so the termination of benefits will go into effect on October 26*.
- October 26 – The termination of benefits goes into effect, verification is considered complete and results of verification are ready to be compiled for submitting on the required Verification Summary Report.

* PLEASE NOTE: Any family sent a termination of benefits letter has the opportunity to request a hearing. This may delay the actual termination of benefits. If any date(s) set is/are going to fall on a weekend or holiday, the date(s) should be adjusted to the next business day.

**LEAs are not required to make more than two requests for verification materials.
Delaying closure of verification process may put LEAs at risk of not meeting
USDA verification requirements and deadlines.**

Step 5: Enrollment and Student Counts – Last Operating Day of October

ALL NSLP sponsors/districts,
MUST provide *Enrollment and/or Student Counts* as applicable.

ENROLLMENT COUNTS

*Entered on Step 3 of the
Verification Summary Report*

Enrollment counts are done by district and are broken down into two categories:

1. Total enrollment of all school sites (Including Provision and CEP sites);
And if applicable,
2. Total enrollment of all RCCI sites

STUDENT COUNTS

*Entered on Step 2 and/or Step 3 of the
Verification Summary Report*

Student counts must be taken on the last operating day in October. The actual verification of applications and count of applications is done at the sponsor/district level, but some of the required student counts are done by site. Students CANNOT be double counted - Each student can only be included in one specific group of students.

The student counts that must be taken by site are as follows:

1. Students direct certified as receiving SNAP benefits and all students receiving benefits due to extension of SNAP benefits. This count is for SNAP benefits ONLY. Provision, CEP, and RCCI sites would have a count of '0' (zero).
2. Students direct certified as receiving TANF and all students receiving benefits due to extension of TANF. Or student directly certified as having a Foster Child status. In addition, those students that are documented as being Homeless, Migrant, Runaway, Head Start, or Even Start are also included in this count. Provision, CEP, and RCCI sites would have a count of '0' (zero).
3. Students direct certified as receiving free Medicaid and all students receiving benefits due to extension of Free Medicaid.
4. Students direct certified as receiving reduced Medicaid and all students receiving benefits due to extension of reduced Medicaid.
5. Students certified to be receiving SNAP benefits through use of a DHS/SNAP agency benefits statement or documentation being presented. Any household presenting an award letter should first be checked in the electronic direct certification system. Only if the students were not able to be electronically direct certified should they be included in this count. Presentation of medical, Link, or other card is NOT acceptable. Provision, CEP, and RCCI sites would have a count of '0' (zero).

With the implementation of the electronic direct certification system in Illinois, the presentation of an award letter or benefits statement from the DHS/SNAP agency is unlikely.

The remaining student counts are for students listed on household eligibility applications, but are **not** site specific. Only the 5 previous student counts are site specific.

6. All students that were on an application that was approved for FREE meal benefits by providing a SNAP/TANF ID number on an application.
7. All students that were on an application that was approved for FREE meal benefits by providing income and household size information on an application.
8. All students that were on an application that was approved for REDUCED PRICE meal benefits by providing income and household size information on an application.

Step 6: Submit Verification Summary Report

Federal regulations require ISBE to collect a summary of LEA verification efforts. This is collected annually through a report in IWAS/WINS entitled *Verification Summary Report*.

Detailed instructions and the report will be available online in November. The Verification Summary Report is **due to ISBE no later than December 15**.

Verification for Cause

The required verification sample cannot exceed the percentages defined in *Step 1: Select Sample*. However, LEAs have an obligation to verify questionable applications. *Income* and *SNAP/TANF* applications may be subject to verification for cause.

Verifications for cause are not part of the required sample and may be done at any time during the school year. Direct verification can be attempted in all verification for cause situations.

Any applications verified for cause prior to submission of the VSR, will need to have the results of the verification for cause reported on the VSR. The VSR is **due to ISBE no later than December 15**.

Tracking Verification Procedures

LEAs should use the *Confirmation Review and Verification Tracking Form (ISBE 68-21)*.

Verification Process – *Questions and Answers*

1. Our district always verified 100 percent of the free and reduced-price Household Eligibility Applications. Is this still allowable?

No, the USDA does not allow verification of ALL applications. Regulations require no more or no less than 3 percent of total approved applications be verified.

2. Jones High School has 180 approved applications on file as of October 1, how many must they verify?

Six. They must use the standard sample size - 3 percent or 3,000 approved applications (whichever is less) selected at random from error-prone applications. Therefore, they must verify six applications (selected first from error-prone, then random). Three percent of 180 = 5.4, always round up.

3. Devine School District has the following combination approved for free or reduced-price lunch:

- 16 students based on 3 migrant/homeless/runaway listings
- 116 students based on 84 income-based applications
- 7 students based on 4 TANF/SNAP applications
- 45 students based on 45 TANF/SNAP Direct Certification

Devine School District does not qualify for the alternate sample sizes. How many applications must they verify under the standard sample size?

Three. Keep in mind the verification sample is selected from the number of approved applications, not students, on October 1. These applications do not include Direct Certification and homeless/runaway/migrant listings as they are not subject to verification. Therefore, there are 88 approved applications from which you select 3 percent to fulfill the standard sample size. Eighty-eight applications x .03 = 2.64 = 3, always round up.

4. Following the standard sample size guidelines, Devine School District must verify three applications. Of their 88 applications, 2 are error-prone. Is verifying the 2 error-prone applications sufficient?

No. The sample size required them to verify three (3 percent of 88). They must therefore select the third application at random from all approved applications (which may include a SNAP or TANF application).

5. You must verify 20 applications and one of the error-prone applications you select is from a household you know has recently moved but has not provided you with an address or phone, which makes contacting them difficult. Must you still verify this application?

You have the option of declining to verify up to 5 percent of your selected sample. With 20 applications, you can decline to verify one application. If you decline to verify an application, you must randomly select another application (first from error-prone and if not enough error-prone, then select randomly from all approved applications).

6. You do not have enough error-prone applications for your sample size, and therefore, randomly select an application with a SNAP number. What is the simplest way to verify such an application?

Use the Direct Verification link available through the Direct Certification system in IWAS/WINS. If this is successful, you do not need to contact the household.

7. Consolidated School District 123 did not complete and submit the ISBE verification summary report (VSR) by December 15. What are the possible issues that could result from failure to complete and submit an accurate VSR by the deadline?

Any NSLP/SBP sponsor (district) that does not submit the VSR by the December 15th deadline is subject to withholding of payment of any meal claims filed after December 15th. NSLP/SBP sponsors will be able to continue filing claims, but payment of those claims will not be completed until a complete and accurate VSR is submitted to ISBE.

8. Grand Island School district has a total of 13 NSLP/SBP sites. Three of those sites are operating CEP, and one site is an RCCI with no day students. How many sites of Grand Island School District will need to complete the verification process?

Nine. CEP sites and RCCIs with no day students are exempted from the verification process, only the 9 sites that actually use and process household eligibility applications will need to complete the actual process of verification.

9. An application approved on August 28 is selected for verification. To document their income, the household submits payroll stubs from July 31 of that year. Are these payroll stubs acceptable?

Yes. You must accept any documentation date anytime from one month prior to the date of application, up to the date verification materials are requested (for most, this means July through October).

Miscellaneous Regulations

Miscellaneous Federal and State Regulations

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Additional Resources

- ISBE Rules and Waivers Division
<https://www.isbe.net/Pages/School-Fee-Waivers.aspx>
- ISBE Local School Wellness Policy Information Website
<https://www.isbe.net/Pages/Local-School-Nutrition-Wellness-Policy.aspx>
- ISBE Accommodating Children with Special Dietary Needs Website
<https://www.isbe.net/Pages/School-Nutrition-Special-Dietary.aspx>
- ISBE Child Nutrition Program Food Safety Information Website
<https://www.isbe.net/Pages/Child-Nutrition-Program-Food-Safety-Information.aspx>
- USDA Professional Standards for School Nutrition Professionals Website
<https://www.isbe.net/Pages/Nutrition-Standards.aspx>

School Fee Waivers and the Verification Process

Under Illinois law, school districts are required to waive charges for textbooks and other fees for children whose families are unable to afford them, including children eligible for the federal free lunch and breakfast program, and for any other extenuating circumstances for which the school board will waive fees as communicated in its adopted policy (e.g., reduced-price lunch or medical emergencies). [105 ILCS 5/10-20.13 and 34-21.6]

Currently, a school district is obligated to waive at least the cost of textbooks and instructional materials for any student whose family income is within the federally established guidelines for free meals, regardless of the student's participation in the federal meals program (i.e., National School Lunch, School Breakfast, Special Milk or After-School Snacks). In addition, the district cannot verify the eligibility to receive a school fee waiver of a student who is receiving free meals outside of the verification requirements established for the federal meals program.

School districts may however establish a process for requesting school fee waivers that is separate and apart from the application process for the federal meals program for which the district will be able to verify eligibility for a fee waiver independently (see [Public Act 96-0360](#)).

There are two options for collecting eligibility applications:

Option 1: Use of a student's application for free meals under the federal program as the basis for granting a school fee waiver; or

Option 2: Establishment of a separate application process to determine a student's eligibility for school fee waivers based upon the income guidelines established by the federal meals program that does not rely on a student's application for, eligibility for or participation in the free meals program.

Under Option 1, a school board that participates in a federally funded, school-based child nutrition program and uses a student's application for that program as the basis for waiving fees must follow the federal requirements for verifying a student's eligibility for both the meals program and waiver of school fees. This means that if a child is eligible for free meals, his or her school fees are automatically waived based on the meals application; however, federal requirements restrict the school district to verifying only 3% of the approved meal applications on file as of October 1, unless it has established just cause. No further verification **of the student's eligibility for the fee waiver** can be made. A child who is "directly certified" (i.e., is receiving SNAP/Food Stamps or TANF) or is "categorically eligible" (i.e., is homeless, foster child, migrant or runaway or in Head Start) would automatically receive school fee waivers as well under this option and would likewise have his or her receipt of free meals and a school fee waiver subject to the federal verification limitations.

It should be noted that a school board that chooses to use the federal meals application as the basis for granting school fee waivers also must have a school fee waiver application available for

families who wish to apply only for the fee waiver and not the free meals program. A sample form entitled Household Income Form (#69-72) is available in both English and Spanish on [ISBE's Forms website](#). Verification of school fee waiver eligibility for any student not applying for the federal meals program may be conducted in accordance with Option 2 below.

Under Option 2, a school board must establish an application process for determining and verifying eligibility for school fee waivers that is completely independent from the process for determining and verifying eligibility for free meals.

While a student would still qualify to have his or her school fees waived based on the federal income guidelines, the granting of school fee waivers could not be made based on the student's application for free and reduced price meals. The new state law relieves a district using a separate process from the verification thresholds set by the federal program. Instead, a school district may verify a student's eligibility for a school fee waiver no more often than every 60 calendar days. If information obtained during the school fee waiver verification process determines that the student's family income is not within the federal income guidelines for free meals, and then the fee waiver can be denied. However, the school district cannot use the information received under this process to deny a student's participation in the free meals program. A discrepancy between the school fee waiver application and the free meal application is not sufficient evidence ("just cause") to allow a school district to verify the meal application. In other words, a district cannot verify the meal application based on information obtained through verification of a fee waiver. It is important to note, however, that a child who is "directly certified" (i.e., is receiving SNAP/Food Stamps or TANF) or is "categorically eligible" (i.e., is homeless, foster child, migrant or runaway or in Head Start) would automatically receive school fee waivers as well under this option and would likewise have his or her receipt of free meals and a school fee waiver subject to the federal verification limitations.

A sample form for processing fee waivers under Option 2 is available as Forms 69-72 and 69-72S at <https://www.isbe.net/Pages/ISBE-Forms.aspx>.

Although state law does not require school districts to waive fees for students receiving reduced-price meals, school districts that choose to do so are subject to the verification restrictions outlined under each application option above.

Questions regarding the processing or verification of federal meal program applications?

Visit <https://www.isbe.net/Pages/SchoolNutritionAdminHandbook.aspx> or contact Nutrition Programs Division at 800-545-7892 or cnp@isbe.net.

Questions about fee waivers?

Contact the Rules and Waivers Division at 217-782-5270.

Meal Service Mandates

Illinois Free Lunch and Breakfast Programs Mandate

Per [105 ILCS 125/4](#) and [23 Illinois Administrative Code 305.10](#), every public school, including public special education facilities, must have a free lunch program that provides free lunches (and free breakfasts if a school offers breakfast) to students eligible to receive free meals.

State reimbursement to offset a portion of the cost of the meal is available if a site serves a reimbursable meal to a student eligible for a free meal and the site is enrolled in the Illinois Free Breakfast and Lunch Programs. Sites participating in a federally-funded school meals program, National School Lunch Program (NSLP), and/or School Breakfast Program (SBP) are automatically enrolled in the corresponding Illinois Free Program.

School Breakfast Program Mandates

Breakfast - Per [105 ILCS 126/15](#), every public school in which at least 40 percent of the students were eligible for free or reduced-price lunches in October of the preceding year* must operate a [school breakfast program](#).

State reimbursement to offset a portion of the cost of the meal is available if a site serves a reimbursable meal to a student eligible for a free meal and the site is enrolled in the Illinois Free Breakfast and Lunch Programs. Both state and federal reimbursement is available if a site enrolls in the National School Lunch Program (NSLP), and/or School Breakfast Program (SBP).

A district wishing to utilize the [opt-out provision](#) of this mandate for the upcoming school year, must petition their regional superintendent of education no later than February 15 of the current school year.

Breakfast After the Bell – Per [105 ILCS 126/16](#), every public school in which at least 70 percent of the students were eligible for free or reduced-price lunches in October of the preceding year* must operate a breakfast after the bell program. Breakfast after the bell means breakfast is provided to children after the instructional day has officially begun and does not prohibit schools from also providing breakfast before instructional day begins. Schools may choose whichever delivery model that best suits the students. Typical options include:

- **Breakfast in the Classroom:**
Food is delivered (by staff, students or volunteers) to each classroom after school begins and students are permitted to eat breakfast in the classroom.
- **Grab and Go:**
Students pick-up bagged or boxed breakfast from carts or specified areas and are permitted to eat in either designated areas or the classroom.

- Breakfast After First:
An extended passing or breakfast period is offered in the cafeteria, following the first or second period of the day.
- Other options include serving breakfast during an early recess or outdoor lesson. As long as breakfast is offered to all students after the instructional day has begun, schools and districts have great flexibility in serving breakfast after-the-bell.

State reimbursement to offset a portion of the cost of the meal is available if a site serves a reimbursable meal to a student eligible for a free meal and the site is enrolled in the Illinois Free Breakfast and Lunch Programs. Both state and federal reimbursement is available if a site enrolls in the National School Lunch Program (NSLP), and/or School Breakfast Program (SBP).

Schools participating in the School Breakfast Program must inform families of the availability of breakfasts just prior to the beginning of the school year and throughout the school year via routine methods of communicating with families, such as website posting, weekly messages, public address system, etc.

Districts may be relieved from this Breakfast After the Bell requirement if they demonstrate either:

- 1) they are delivering a school breakfast effectively, as defined by 70% or more of the free and reduced-price students participating in the School Breakfast Program,
or
- 2) due to circumstances specific to that school district, the expense reimbursement would not fully cover the costs of implementing and operating a breakfast after the bell program. District must submit cost analysis to district's board of education, district board holds public hearing, and district board passes a resolution that district cannot afford to operate a breakfast after the bell program. District must post date, time, place, and subject matter of meeting on its website; notify ISBE by emailing cnp@isbe.net at least 14 days prior to the hearing; and submit final resolution approving the breakfast after the bell exemption to ISBE by emailing cnp@isbe.net upon passage.

Summer Food Service Mandate

Per [105 ILCS 126/20](#), every public school in which at least 50 percent of the students were eligible for free and reduced-price lunches in October of the preceding year* AND has a summer program operating during the summer months must provide a [summer breakfast and/or lunch program](#) for the children in that community. The plan must be implemented each year so long as the above criteria are met and must operate for the duration of the school's summer school program. A school wishing to utilize the opt-out provision [105 ILCS 126/20 (d)] of the program for the upcoming summer must petition their regional superintendent by January 15 of the current school year.

Federal reimbursement to offset a portion if not all of the cost is available if a site serves a reimbursable meal to a child and site is enrolled in either the National School Lunch Program's Seamless Summer Option (SSO) or the Summer Food Service Program (SFSP).

*** Determining if Site is Required to Operate Meal Service Programs**

All public schools must offer the IL Free Lunch/Breakfast Program. However school boards must determine which schools must operate the School Breakfast Program and Summer Food Service Program.

To assist school boards, the Illinois State Board of Education has two sources of data available online:

If the site(s) participates in the NSLP, school boards should use the previous year's October claim data collected annually by the Nutrition Programs Division. For example, for school year 2018-2019 (fiscal year 2019), use the October 2018 (fiscal year 2018) data. You can access the data at <https://www.isbe.net/Pages/Seamless-Summer-Option-Meal-Eligibility.aspx>.

1. Locate the name of the school.
2. Locate the percentage free and reduced-price eligible.
 - If the site is at least 50% free and reduced-price eligible, that site is mandated to operate a School Breakfast Program as well as Summer Breakfast/Lunch program, in addition to the IL Free Lunch and Breakfast Program.
 - If the site is at least 40% free and reduced-price eligible, that site is mandated to operate a School Breakfast Program in addition to the IL Free Lunch and Breakfast Program.
 - If the site is less than 40 percent free and reduced-price eligible, then the site is mandated to operate only the IL Free Lunch and Breakfast Program.

If the site(s) does not currently participate in the National School Lunch Program (NSLP), school boards should use low income data reported on the previous year's fall housing report. You can access the data at http://www.isbe.net/research/htmls/fall_housing.htm.

1. Click on School Summary Data.
2. Locate the name of the school/site.
3. Divide *low-income* by *K-12 enrollment* to determine the low income percentage.
 - If the site is at least 50% free and reduced-price eligible, that site is mandated to operate a School Breakfast Program as well as Summer Breakfast/Lunch program, in addition to the IL Free Lunch and Breakfast Program.

- If the site is at least 40% free and reduced-price eligible, that site is mandated to operate a School Breakfast Program in addition to the IL Free Lunch and Breakfast Program.
- If the site is less than 40 percent free and reduced-price eligible, then the site is mandated to operate only the IL Free Lunch and Breakfast Program.

Meal Service Times and Access

Schools participating in the National School Lunch and/or School Breakfast Programs must offer lunch between 10:00 am and 2:00 pm, unless exempted by USDA through ISBE, and breakfast at or close to the beginning of the child’s school day. Schools are encouraged to provide sufficient lunch periods that give all students enough time to be served and to eat their lunches; at least ten minutes after receiving breakfast and twenty minutes after receiving lunch.

Schools must provide access to meals to all students who are enrolled and present during meal services. Meal(s) must be served on days when school is in session for 300 minutes (5 hours) or more.

Expanded Learning Time Snacks

A school operating longer than the traditional school day may be eligible for afterschool snack reimbursement during their school day through the School Nutrition Programs (SNP) or CACFP. Eligibility to participate in an expanded learning time snack would be available to schools that:

- Operate a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located
- Schools that participate in the NSLP
- Schools that offer an afternoon snack, served after lunch, towards the end of the “expanded learning time” school day.

Meal Service Oversight Options

Sponsors have three options for the oversight of their meal services, all of which must be reviewed and approved by ISBE:

- 1) Operate as your own sponsor/School Food Authority (SFA).
- 2) Operate as a site under the public district with which you are associated that participates in a federal meal or milk program. This option is available only to charter schools.
- 3) Operate under an Alternate Agreement in which legal and financial authority is officially transferred from one SFA to the other. The contract between the SFAs must state that SFA #1 is accepting total legal and financial responsibility for the newly incorporated School Food Authority’s (SFA #2’s) meal program(s). Some examples include paying over-claims as

a result of administrative reviews, utilization of USDA Foods and complying with program regulations. The contract must state that the incorporated School Food Authority (SFA #2) is relinquishing its authority to operate the specified school meal program(s) to SFA #1. The Alternate SFA Arrangement is different than a “School to School Agreement” where an SFA provides meals, serving as a meal vendor for nearby SFAs or schools that it does not control.

Meal Service Delivery Options

Sponsors have five options for delivery of meal services, the first four of which must be reviewed and approved by ISBE:

- 1) Food Service Management Company Contract – For more information on this option, refer to the *Procurement* section of this handbook.
- 2) Vended Meals Contract – For more information on this option, refer to the *Procurement* section of this handbook.
- 3) School-to-School Agreement – For more information on this option, refer to the *Procurement* section of this handbook.
- 4) Alternate Agreement – This option is an agreement between the SFAs which must state that SFA #1 is accepting total legal and financial responsibility for the newly incorporated School Food Authority’s (SFA #2’s) meal program(s), including not only paying over-claims as a result of administrative reviews, utilization of USDA Foods, and complying with program regulations, but daily meal service.
- 5) Self-prep – Under this option, the SFA/sponsor of federal meal program purchases, prepares and serves on their own following Child Nutrition Program regulations.

Record Retention

Documentation related to the school-based child nutrition program must be maintained on file at the site or the SFA office for the current year, plus three years prior. In the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed. Documentation refers to any materials related to certification, verification, benefit issuance and claiming, including but not limited to, Household Eligibility Applications, verification letters to families, verification documents received from families, submitted menus, production records, and procurement.

Cooperation with Research and Evaluation

Institutions participating in Child Nutrition Programs are required to cooperate with the Department of Agriculture officials and contractors conducting evaluation and research.

Leftover Foods

Schools should plan and prepare meals with the goal of serving one reimbursable lunch, and if applicable one reimbursable breakfast, per child per day. However, with fluctuations in attendance and participation, leftovers are likely. If a school has leftovers on a frequent basis, menu planning and production practices should be adjusted to reduce leftovers. All alternatives permitted by program regulations and State and local health and sanitation codes should be exhausted before discarding food. Options may include:

- using leftovers in subsequent meal services
- offering “sharing tables” -

FNS recognizes that, for various reasons, children may not always want to consume certain food or beverage items included in their meal. “Share tables” are tables or stations where children may return whole food or beverage items they choose not to eat, if it is in compliance with local and State health and food safety codes. These food and beverage items are then available to other children at no cost who may want additional servings. Food or beverage items left on the share table may be served and claimed for reimbursement during another meal service (i.e., during an afterschool program when leftover from a school lunch). When the milk carton is unopened and the proper temperature is maintained and other meal components that were served may be for re-service if such a practice is permitted under local and State health and food safety codes. Food or beverage items should only be reused in situations where it is necessary to prevent food waste. It is important to note that when using a share table, CNP operators are able to claim the reimbursable meal at the point of service even if a child then puts one or more of the meal components on the share table. When food items are left on the share table at the end of the meal service, that food can be used in later meals that are claimed for reimbursement. Operators choosing to use share tables must follow the food safety requirements outlined in 7 CFR 210.13, 220.7, 226.20(l), and 225.16(a), respectively. In addition, CNP operators must be aware of all applicable local and State health and food safety codes to ensure their use of share tables does not violate any of those codes. It is important to keep in mind that local and State health and food safety codes may be more restrictive than the FNS requirements, or may place specific limitations on which food or beverage items may be reused. To ensure compliance with food safety requirements, CNP operators should discuss plans for a share table with their local health department and State agency prior to implementation. Further, schools must ensure that their policies for saving and sharing food or beverage items are consistent

with the LEA's Hazard Analysis and Critical Control Point (HACCP) plan. Please see [section 3-306.14](#) of the 2013 the Food and Drug Administration (FDA) Food Code for more information about food safety considerations when re-serving food.

- transferring food to other sites operating federal school meal program; or
- where it is not feasible to reuse leftovers, excess food may be donated to a nonprofit organization, such as a community food bank or homeless shelter or other non-profit charitable organization which is exempt from tax under section 501(c)(3) of the Internal Revenue Code of 1986 (26 U.S.C. 501 (c)(3), e.g. soup kitchens or homeless shelters. This is called gleaning. The cost of such donated food is an allowable operating cost of the school foods service account. If schools choose to donate leftovers, documentation of the quantity and costs of the foods that were donated, as well as the name(s) of the receiving organization(s) must be kept, and ensure local health department rules and regulations. For further information, see [SP 41-2016](#), [SP 11-2012](#), and [Guidance on the Food Donation Program in Child Nutrition Programs](#).
- FNS has additional resources for reducing food waste in the CNPs:
 - Creative Solutions to Ending School Food Waste: <http://www.fns.usda.gov/school-meals/creative-solutions-ending-school-food-waste>
 - Join the Food Waste Challenge: <http://www.usda.gov/oce/foodwaste/join.htm>
 - The Smarter Lunchroom Movement: <http://smarterlunchrooms.org/>
 - [SP 41-2014](#), *Clarification of the Policy on Food Consumption Outside*

Local Wellness Policy

A Local School Wellness Policy is a written document that sets the framework for a healthy school environment through goal setting and policy making. Local Wellness Policies were established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004. In 2010, the requirements of Local Wellness Policies were strengthened by the Healthy, Hunger-Free Kids Act (HHFKA). Under 7 CFR 210.31(a), all sponsors participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) are required to have a Local Wellness Policy for all schools under their jurisdiction.

Policy Content

7 CFR 210.31(c) requires, at a minimum, that the content of the Local Wellness Policy must include:

- Specific goals for 1) nutrition promotion, 2) nutrition education, 3) physical activity, and 4) other school-based activities that promote wellness

- Standards for all food and beverage items sold to students on the school campus during the school day, including meals provided through the NSLP and/or SBP as well as competitive food items sold outside the NSLP and SBP. NSLP and/or SBP meals must meet the school meal nutrition standards and competitive food items must meet Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold to students, on the school campus during the school day
- Policies for food and beverage marketing allowing only the marketing of food and beverage items that meet the Smart Snacks in School standards on the school campus during the school day
- Identification of the position of the school or organization official(s) responsible for the implementation and oversight of the Local Wellness Policy
- A description of how parents, students, SFA representatives, teachers, school health professionals, school board members, school administrators, and the general public are provided an opportunity to participate in the development, implementation, review, and updates of the Local Wellness Policy
- A description of the assessment plan of the Local Wellness Policy and the manner in which policy content and assessment results will be reported to the public

Triennial Assessment

Requirements at 7 CFR 210.31(e) state that sponsors must assess each schools' compliance with the Local Wellness Policy at least once every three years (i.e., triennial assessment). The first triennial assessment is due June 30, 2020. The triennial assessment must measure:

- The extent to which schools are in compliance with the Local Wellness Policy
- The extent to which the Local Wellness Policy compares to model policies
- A description of the progress made in attaining the goals outlined in the policy

Public Notification

Under 7 CFR 210.31(d), sponsors are required to inform the public about the content and implementation of the Local Wellness Policy, and make the policy and any updates available to the public on an annual basis. Sponsors are also required to inform the public about progress made toward meeting the goals of the Local Wellness Policy, including compliance with the policy by making the results of the triennial assessment available to the public in an accessible and easily understood manner.

Recordkeeping

Sponsors are required to maintain record of the Local Wellness Policy. This includes keeping a copy of the current wellness policy on file and maintaining documentation of 1) the most recent assessment of the policy, 2) availability of the wellness policy and assessments to the public, and

3) efforts to review and update the policy, including the individuals involved and the efforts made to notify stakeholders of their ability to participate in the process.

Resources

ISBE has developed several resources to assist schools with Local Wellness Policy implementation, all of which can be found on ISBE's [Local Wellness Policy webpage](#):

- Local Wellness Policy Template for Schools
- Local Wellness Policy Template for Residential Child Care Institutions (RCCIs)
- Local Wellness Policy Content Checklist
- ISBE Triennial Assessment Template

Required Poster on Choking

The *Emergency Care for Choking Poster* is required to be displayed in all food establishments, including school cafeterias. This poster can be downloaded from the Illinois Department of Public Health's (IDPH) website at <http://www.idph.state.il.us/about/choking.htm>.

Student Workers

In order for students to work in the food service area during meal periods, school staff must obtain prior written consent from the individual who legally enrolled the student in school. Under no circumstances may an eligible student be required to work for his or her meals. If a student worker is provided a reimbursable meal for their work at no charge to them, the SFA must claim such meal in the eligibility category (free, reduced price, or paid) of the student. Such meals may not be claimed "free" unless that is the eligibility category of the student.

Accommodating Children with Disabilities and/or Special Dietary Needs

If a requested substitution meets the meal pattern requirements under any school-based child nutrition program, the substitution can be made, but is not required.

For a student with a disability

Substitutions must be made to the regular meal, including milk for any child with disabilities (i.e. a life-threatening reaction when exposed to the food and/or beverage) when the following two requirements are met:

- A licensed physician’s statement is required. Pursuant to Section 27-8.1 of the School Code, the licensed physician that may perform student health examinations is a physician licensed to practice medicine in all of its branches. Physicians can complete a [sample form](#).
- The statement must include the child’s disability, explanation as to how the disability restricts the child’s diet, the major life activity affected by a disability, and food(s)/beverage(s) to be omitted and foods/beverages to be substituted.

For a student without a disability

Substitutions may be made to the reimbursable meal for any child who has a food intolerance or allergies that do not rise to the level of a disability when the following two requirements are met:

- A signed statement from a “medical authority” is required. A medical authority would include licensed physicians, chiropractic physicians, physician assistants, and nurse practitioners.
- The statement must include the medical or special dietary reason for the substitution, the food(s)/beverage(s) to be omitted, and food(s)/beverage(s) to be substituted.
- If a non-dairy milk substitute (e.g. soy milk) is served, it must meet the nutritional standards of milk as outlined below.

For a student without a disability requesting fluid milk substitution

Any fluid milk substitution that meets these requirements may be made by the SFA for non-disabled students when the following requirements are met:

- A signed statement from a medical authority, parent or guardian which includes the medical or other special dietary reason for the need for substitution. Any reasonable request could be accepted (e.g. milk allergy, vegan diet, and religious, cultural or ethical reasons). If a request only states that a child does not like milk, the student can be offered flavored milk instead of a milk substitute.

- The SFA may choose the nondairy beverage to be provided, as long as the substituted beverage includes the following nutrients:

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

Because the Nutrition Facts Label on food products does not list all the required nutrients listed above, the food service operation must request documentation from the product manufacturer to confirm the presence of all required nutrients at the proper level. NOTE: Lactose-free milk provides the same nutrients found in regular cow's milk; therefore, it can be served as part of the reimbursable meal without documentation/written statement.

- Expenses that exceed program reimbursements must be paid by the SFA for fluid milk substitutions.
- The SFA must inform the State agency of schools that choose to offer fluid milk substitutes for non-disabled students.
- The substitution request must remain in effect until the request is revoked or the school changes its fluid milk substitution policy for non-disabled students.

Schools can receive reimbursement for meals without milk if they operate Offer versus Serve (OVS), under which milk or other meal component(s) could be declined by a student. If a school does not however operate OVS, a non-disabled child with a medical or special dietary need must take the regular fluid milk or an acceptable milk substitute provided by the school in order for school to claim meal for reimbursement.

Accommodation Guidance

Accommodating Children With Special Dietary Needs in the School Nutrition Programs (USDA guidance) <https://www.isbe.net/Pages/School-Nutrition-Special-Dietary.aspx>.

Guidelines for Managing Life-Threatening Food Allergies in Schools (IL guidance) <https://www.isbe.net/Pages/Food-Allergy-Guidelines.aspx>.

Reimbursement for Off-Site Meal Consumption

Program regulations clearly intend for meals reimbursed under the programs to be served and consumed as part of the school program, on school or school-related premises. Sponsors that have adequate monitoring staff may allow a single item of fruit, vegetable, or grain to be taken off-site for later consumption, provided that this is in compliance with state and local health and safety codes, e.g. must be an unopened pre-packaged item or an unaltered, whole fruit or vegetable, to assist in preventing contamination. The food item taken off-site must be from the child's own meal or left on a "share table" by another child who did not want it. The ISBE may prohibit individual sponsors on a case-by-case basis from using this option if there is a question regarding whether the sponsor will be able to provide adequate oversight related to food safety and Program integrity.

Meals must always be served to students that have been determined to be eligible for free meals under federal income guidelines if the student attends an Illinois public school or attends a non-public school that participates in a school-based child nutrition program. This includes students on field trips, involved in work study programs, and placed in alternative settings. Meals served to any students off-site may only be claimed for reimbursement under the following conditions:

School Supervised Field Trips

The school may be reimbursed for meals served on a field trip if the function is a part of the curriculum (not an extra-curricular activity) and the meal meets the meal pattern requirements (including milk). Meals served off-site should be subject to especially stringent sanitary and precautionary measures to avoid contamination and spoilage. If all students are offered the reimbursable meal, the school may claim National School Lunch (federal) reimbursement. If however, a school opts to serve only students eligible for free meals (per IL Free statute), the school may only claim IL Free (state) reimbursement.

Work Study Programs

The school may be reimbursed for meals served to students who are enrolled in one school but attend another work-study site for the part of the day that includes the meal hour. The meal served must meet the meal pattern requirements (including milk). Those students applying for free or reduced-price meals should do so through their home school. The work/study school is responsible for the service of the meals, the record keeping for the meals served, and the Claims for Reimbursement and therefore should obtain a copy of any free and reduced-price meal applications from the home school. If the work/study site does not participate in the federal meal programs, take-out school meals meeting program requirements may be served to such students and claimed for reimbursement by their enrolling school.

Pupil Placements (Special education facilities, alternative schools, safe schools, etc.)

All NSLP/SBP reimbursable meals are claimed where the student is enrolled unless such student is "tuitioned" to another facility. As such, in the instance of pupil placement situations, federal

reimbursement is allowable only if the site in which the student is “tuitioned” participates in the NSLP and/or SBP. The school in which the student is “tuitioned” must be an approved site and must claim the meal for NSLP/SBP federal reimbursement. If a student is “tuitioned” to a [private special education facility](#) from a public school district and the private special education facility does not participate in the meal programs, the home school needs to provide the child with a lunch each day and if the home school is in the IL Free Program, then they can claim the meal for IL Free reimbursement. Please ensure that benefit issuance documentation contains all required information for students in this category.

- If a student is tuitioned to a facility that participates in NSLP/SBP, that facility collects HEA, counts child in NSLP/SBP enrollment, and claims fed and state.
- If a student is tuitioned to a facility that does not participate in any meal program, meals cannot be claimed for reimbursement.
- If a student is sent (not tuitioned) from a school that participates in NSLP/SBP to a facility that participates in NSLP/SBP, the facility serves the meals, keeps accurate meal count, and reports the meal counts back to the enrolling school, who in turn claims the meals.
- If a student is sent (not tuitioned) from a school that does not participate in NSLP/SBP to a facility that participates in NSLP/SBP, the facility can process the applications and serve, count, and claim the meals.
- If a student is sent (not tuitioned) from a school that does not participate in NSLP/SBP to a facility that does not participate in NSLP/SBP, meals cannot be claimed for reimbursement.
- If a free student is sent or tuitioned to a facility that participates in IL Free only, the enrolling school, if public, must ensure the free child gets free meals. Either the enrolling school or the facility could claim state reimbursement if the meal meets the meal pattern requirements.
- If a free student is sent or tuitioned to a facility that does not participate in any meal program, the enrolling school, if public, must ensure a free child gets a free meal. The enrolling school can claim state reimbursement if in IL Free if the meal meets the federal meal pattern requirements.

Food Safety Plan

SFAs are responsible for developing a comprehensive food safety plan for food preparation and service site(s) that is based Hazard Analysis and Critical Control Point (HACCP) principles and must conform to guidance issued by the USDA. Standard operating procedures for safe food handling must include any facility or part of a facility where food is stored, prepared, or served, such as on school buses, in hallways, school courtyards, kiosks, classrooms or other locations outside the cafeteria for SBP, NSLP, SMP, FFVP, and afterschool snack programs.

A school food safety program must include the following elements:

- A Written Food Safety Plan –

A food safety plan must be developed for each food preparation and service site. The food safety plan must include how to apply HACCP principles by doing the following:

- Documenting recipe/menu items in the appropriate HACCP process category
- Documenting Critical Control Points of food production
- Monitoring
- Establishing and documenting corrective actions
- Record keeping
- Reviewing and revising the overall food safety plan periodically

- Documented Standard Operating Procedures (SOPs) –

SOPs are a very important factor in developing an effective food safety plan. An SOP serves as a specific food safety process and is designed to control hazards not outlined specifically in the general HACCP plan. For example, soiled and un-sanitized surfaces of equipment and utensils should not come into contact with raw or cooked (ready-to-eat) food. Proper procedures to prevent this should be covered by an SOP.

Each of these required elements is explained in more detail in the USDA's *Guidance for School Food Authorities: Developing a School Food Safety Program Based on the Process Approach to HACCP Principles*. Training materials, including food safety templates, USDA guidance documents, and sample SOPs are available at <https://www.isbe.net/Pages/Child-Nutrition-Program-Food-Safety-Information.aspx>.

Food Sanitation Inspections

Each school year, an SFA must obtain two food sanitation inspections for each site where food is prepared or served. For most counties, the local health department will conduct such inspections. If the SFA is not in a county that has a local health department then the SFA must contact neighboring county health departments to conduct food sanitation inspections. Copies of these inspections must be maintained at the SFA or at the site. The most recent food sanitation report must be posted in a predominant location that is viewable by the general public; i.e., eating area or near the school office.

SFAs that have not received a food sanitation inspection several months into the school year must write a letter to the [local health department](#), requesting the required two food service inspections for each site where food is prepared or served. The letter must be maintained at the SFA or at each site as documentation of the attempt to comply with two food inspections as required by USDA regulations. A [sample letter](#) is available.

Food Handler Training

The Food Handler Training Enforcement Act requires all food service area employees or food handlers that work with open/unpackaged foods, food service equipment or utensils, or any food contact surfaces to receive an approved food handler training.

This training requirement includes school food service staff. School food services are classified as being “non-restaurant” facilities. Food handlers working in non-restaurant facilities must complete an approved training program. Additional information regarding the Food Handler Training Enforcement Act is available at

http://www.idph.state.il.us/about/fdd/FSSMC_FoodHandler_FAQ_V5_07072014.pdf.

Notice to Households of Program Availability

Schools participating in the School Breakfast Program (SBP) must inform families of the availability of breakfasts. A notification of the availability of breakfast must be relayed just prior to or at the beginning of the school year in the informational packets that are sent to each household with free and reduced price meal applications for the new school year. In addition, schools should send reminders regarding the availability of the SBP multiple times throughout the school year. Schools can provide reminders to children through their public address systems in schools or through means normally used to communicate with the households of enrolled children. Other acceptable outreach activities may include developing or disseminating printed or electronic material to families and school children. For example, information about the SBP should be posted on the school’s website.

School food authorities (SFAs) must also cooperate with Summer Food Service (SFSP) institutions to inform eligible families of the availability and location of free meals for students when the regular school year ends. Acceptable activities may include developing or disseminating printed or electronic materials to families of school children prior to the end of the school year, which provide information on the availability and location of SFSP meals. An SFA can distribute information to households such as the location of nearby SFSP meal sites, times of service, and SFSP service institution contact information. The SFAs may distribute the information through means normally used to communicate with the households of enrolled children. The SFSP Outreach Toolkit for Sponsors and Feeding Sites includes fliers, letters to parents, and other materials that may help schools raise program awareness among students and their families. The SFSP Toolkit is available at www.summerfood.usda.gov/library/toolkit.pdf.

USDA Professional Standards for School Nutrition Professionals

USDA released Professional Standards for school foodservice directors, managers, school nutrition staff and state agency directors that went into effect on July 1, 2015. The standards seek to ensure that State and local school nutrition program personnel in the National School Lunch and School Breakfast Programs have the knowledge and skills to manage and operate the programs correctly and successfully. The USDA established hiring standards for persons that are hired as the School Nutrition Programs Director in all LEAs. The USDA also established annual training hour requirements for all School Nutrition Program staff. A [summary of the requirements](#) is available online as well as included on the following pages.

The USDA Professional Standards Training Resource Center contains links to a variety of training that school district professional may use to meet requirements: <https://professionalstandards.fns.usda.gov/>.

In addition to the summary of professional standards, the USDA has issued clarifying Q&As, with those available online at <https://www.isbe.net/Documents/SP38-2016-QA.pdf>. The following are the most commonly asked questions thus far in Illinois, along with answers that help further explain these requirements.

Frequently Asked Questions

- 1. If the school nutrition program director role is shared between multiple people (for example, a business manager, and an administrative assistant and principal), how do the hiring standards for new program directors apply?**

The individual who plans, administers, implements, monitors, and evaluates all district-wide aspects of the school nutrition program is generally considered a school nutrition program director. In some SFAs, district-level program responsibilities are divided into several positions. In these instances, only the person hired to perform the majority of the program director duties must meet the hiring standards. Subordinates, such as individuals operating the NSLP afterschool snack service under the supervision of the program director, are not expected to meet the hiring standards but must complete the annual training standards that are appropriate for their positions.

Duties of the program director generally include sanitation, food safety, and employee safety; nutrition and menu planning; food production; facility layout and design and equipment selection; procurement; financial management and recordkeeping; program accountability; marketing; customer service; nutrition education, general management; personnel management; and computer technology. See a sample job description for a program director at: <http://www.nfsmi.org/ResourceOverview.aspx?ID=161>.

Professional Standards for All School Nutrition Program Employees

Summary of the Final Rule Effective July 1, 2015

USDA has established minimum professional standards requirements for school nutrition professionals who manage and operate the National School Lunch and School Breakfast Programs.

The standards, another key provision of the Healthy, Hunger-Free Kids Act of 2010 (HHFKA), aim to institute minimum education standards for new State and local school nutrition directors as well as annual training standards for all school nutrition professionals. These new standards will ensure school nutrition personnel have the knowledge, training, and tools they need to plan, prepare, and purchase healthy products to create nutritious, safe, and enjoyable school meals. This final rule will:

- Create minimum hiring standards for new school food authority (SFA) directors based on a school district's size;
- Establish minimum hiring standards for new State directors of school nutrition programs and State directors of distributing agencies; and
- Require minimum annual training for all new and current school nutrition professionals.

A comprehensive Professional Standards Web site provides a database of training options. School nutrition staff can search for training that meets their learning needs in one easy-to-use location: <http://professionalstandards.nal.usda.gov/>

Training Standards for All School Nutrition Program Employees (All Local Educational Agency Sizes)

All Directors	For School Year 2015-2016 ONLY: at least 8 hours of annual continuing education/training. Beginning school year 2016-2017: at least 12 hours of annual continuing education/training. This required continuing education/training is in addition to the food safety training required in the first year of employment.
All Managers	For School Year 2015-2016 ONLY: at least 6 hours of annual continuing education/training. Beginning school year 2016-2017: at least 10 hours of annual continuing education/training.
All Other Staff <small>Other than the Director or Manager who works an average of at least 20 hours per week</small>	For School Year 2015-2016 ONLY: at least 4 hours of annual continuing education/training. Beginning school year 2016-2017: at least 6 hours of annual continuing education/training.
Part-Time Staff <small>Work <20 hours per week</small>	Each year, at least 4 hours of annual continuing education/training, regardless of the number of part-time hours worked. <i>Note: If hired January 1 or later, an employee must only complete half of the above required training hours.</i>

Training Requirements for All State Agency Directors

State Director of School Nutrition Programs	State Director of Distributing Agencies
Each year, at least 15 hours of annual continuing education/training. Must PROVIDE , or ensure that State agency staff receives, annual continuing education/training. Must also PROVIDE a minimum of 18 hours of training to SFAs each year.*	Each year, at least 15 hours of annual continuing education/training. Must PROVIDE , or ensure that State food distribution staff receives, annual continuing education/training.*
<i>*Training is an approved use of State Administrative Expenses (SAE) funds and a variety of training formats are allowed. States may use contractors or partner with other organizations (School Nutrition Association and National Food Service Management Institute, etc.) to provide training.</i>	

Hiring Standards for New School Nutrition Program Directors

New directors — those hired on or after July 1, 2015 — are subject to the new education requirements below. Existing directors will be grandfathered in their current positions as well as in the Student Enrollment category where they currently are working. (School Nutrition Program Directors are the individuals responsible for the operation of school nutrition programs for all schools under the local educational agency (LEA).)

Minimum Requirements for Directors	Student Enrollment 2,499 or less	Student Enrollment 2,500-9,999	Student Enrollment 10,000 or more
<p>Minimum Education Standards</p> <p>See the final rule for additional preferred educational standards for new directors</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major, and at least 1 year year of relevant school nutrition programs experience;</p> <p>OR</p> <p>Associate's degree or equivalent educational experience, with academic major in specific areas,* and at least 1 year of relevant school nutrition programs experience;</p> <p>OR</p> <p>High school diploma (or GED) and at least 3 years of relevant experience in school nutrition programs.</p> <p>(For an LEA with less than 500 students, the State agency may approve a candidate who meets the educational standards but has less than the required 3 years experience.)</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major and at least 2 years of relevant school nutrition programs experience;</p> <p>OR</p> <p>Associate's degree or equivalent educational experience, with academic major in specific areas,* and at least 2 years of relevant school nutrition programs experience.</p>	<p>Bachelor's degree, or equivalent educational experience, with academic major in specific areas;*</p> <p>OR</p> <p>Bachelor's degree in any academic major, and State-recognized certificate for school nutrition directors;</p> <p>OR</p> <p>Bachelor's degree in any academic major and at least 5 years experience in management of school nutrition programs.</p> <p>* Specific majors/areas of concentration: food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.</p>
Minimum Prior Training Standards	At least 8 hours of food safety training is required either not more than 5 years prior to their starting date or completed within 30 days of the employee's start date.		

Hiring Standards for New State Directors

	State Director of School Nutrition Programs	State Director of Distributing Agencies
Education	Bachelor's degree with an academic major in areas including food and nutrition, food service management, dietetics, family and consumer sciences, nutrition education, culinary arts, business, or a related field.	Bachelor's degree with any major.
Knowledge & Experience	Extensive relevant knowledge and experience in areas such as institutional food service operations, management, business, and/or nutrition education.	
Skills & Abilities	Additional abilities and skills needed to lead, manage, and supervise people to support the mission of school nutrition programs.	

Frequently Asked Questions (continued)

2. May training taken between April 1 and June 30 count toward the current or next school year?

At the discretion of the State agency (*ISBE allows this option*), completion of training may occur over a period of two school years. This flexibility is helpful for employees that take most of their training at the end of a school year. Documentation of this allowance should be kept on file as supporting documentation for the both the Administrative Review and Management Evaluation processes. Training completed each year may only be counted once, for one year, and not for both the current and next school years.

3. May the SFA and school nutrition employees select any training topic they want?

Annual training must focus on the day-to-day management and operation of the school nutrition programs. Training must be job-specific and intended to help employees perform their duties well. Training needs are best assessed by an employee in consultation with their manager, the SFA director, or the State agency. Employees should always seek guidance from a supervisor before taking a specific training course to meet the professional standards requirements.

4. How do the training standards apply when the program director duties are divided between three or four staff members, and no one clearly meets the definition of program director? For example, an administrative assistant completes the meal applications, a cook serves the meals, a secretary or teacher runs the point of service and prints out reports, and another staff person submits the claims for reimbursement.

The individual(s) who plans, administers, implements, monitors, and evaluates all aspects of the school nutrition program is generally considered the school nutrition program director. Depending on the size of the school nutrition operation, these program responsibilities may be divided into one or more positions. Only the person who performs the majority of these duties must meet the training standards for program directors. If duties are split evenly, one person needs to be designated as the program director. In both situations, the person(s) not designated as the director must still meet the training requirements for either managers or staff/part-time staff, as appropriate. This would include subordinates operating the NSLP afterschool snack service under the supervision of the program director. These individuals in the snack service must complete annual training, as appropriate for their positions.

5. Do the professional standards apply to a staff such as a secretary or an office assistant who processes free and reduced-price meal applications during the fall months only?

No. Office staff members that process free and reduced-price meal applications or that provide other support for the school nutrition program for a short period of time during the school year are not required to meet the annual training standards. However, these

individual should receive adequate training specific to the task they will perform. This situation is different from office staff working on Program activities 20 hours or more per week throughout the school year; in that situation, staff must complete 6 hours of annual training. Staff working less than 20 hours per week must complete 4 hours of annual training.

6. What professional standards records must be kept for the Administrative Review?

The Professional Standards regulations do not require specific records or a specific recordkeeping system. According to the Administrative Review Manual, supporting documentation for all completed trainings, such as agendas, sign-in sheets, certificates of completion, etc., must be maintained on file and may be used to demonstrate compliance with the annual training standards. Reports from the USDA downloadable training tracking tool (or similar alternative training tracking tool) also are acceptable documentation to demonstrate compliance. Alternative training tracking tools may be developed by the State agencies and/or SFAs but must include at a minimum the required fields listed in the USDA Professional Standards Training Tracker Tool. These fields would include Key Areas, Key Topics and Training.

To demonstrate compliance with the hiring standards, program directors hired on or after July 1, 2015, must provide documentation showing completion of required education. The SFA must retain appropriate records for a 3-year period.

7. If an FSMC staff person performs food service director type duties, but reports to a district business manager who is responsible for the school district's school food service activities, who is required to comply with the hiring and training standards for program directors?

The SFA maintains oversight and responsibility for planning, administering, implementing, monitoring, and evaluating the school meal programs; therefore, the role of program director must remain with the SFA. The SFA-State agency permanent agreement names the individual considered the SFA director or contact. This is the person, or any other designated staff who fulfills those duties, that must meet the hiring standards for new directors. Thus, in some cases, both the SFA contact and FSMC staff person must meet the hiring standards, depending on the duties of these individuals. With regard to training, both individuals would be responsible for meeting the training standards for program directors as they share director responsibilities. Discuss unique situations with your State agency to seek guidance.

Dietary Accommodations

Note: [HB4089 \(Plant-based school lunch option\)](#) will become effective **August 1, 2023**. It requires public school districts participating in the National School Lunch Program to provide a plant-based school lunch option to students who submit a prior request. Additionally, the plant-based option must meet applicable NSLP meal pattern and nutrition requirements. Guidance on how to meet this requirement is provided in this chapter.

Dietary

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Additional Resources

- *ISBE Handbook for Managing Special Dietary Needs in School Food Service*
<https://www.isbe.net/Documents/Special-Dietary-Needs-Handbook.pdf>
- *ISBE Anaphylaxis Response Policy for Illinois Schools*
<https://www.isbe.net/Documents/Anaphylactic-policy.pdf>
- *USDA-FNS Accommodating Children with Disabilities in the School Meal Programs: Guidance for School Food Service Professionals*
<https://fns-prod.azureedge.us/sites/default/files/cn/SP40-2017a1.pdf>
- *SP 26-2017 Accommodating Disabilities in the School Meal Programs: Guidance and Questions & Answers (Q&As)*
<https://fns-prod.azureedge.us/sites/default/files/cn/SP26-2017os.pdf>

Introduction

Federal law and USDA regulations require SFAs participating in the School Nutrition Programs to make reasonable modifications to meals when a child has a disability that affects their dietary needs. Furthermore, 7 CFR 15b.26(d) requires SFAs receiving Federal financial assistance to provide children with disabilities a modified meal at no extra cost. Requested modifications may fall within or outside the current meal pattern requirements, but are subject to different requirements in order for SFAs to receive federal reimbursement for those meals. Guidance on these regulations is provided in the following sections.

Definitions

A list of frequently used terms throughout this section are defined as follows:

Disability – The Americans with Disabilities Act (ADA), Section 504, and Departmental Regulations at 7 CFR part 15b define a disability as a physical or mental impairment that substantially limits one or more major life activities of an individual, a record of such an impairment, or being regarded as having such an impairment. According to the ADA, most physical and mental impairments will constitute a disability; a physical or mental impairment does not need to be life-threatening in order to be classified as a disability.

Physical or Mental Impairment – The Title III ADA Regulations (Section 36.104) define the phrase *physical or mental impairment* as any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following bodily systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine; as well as any mental or psychological disorder such as an intellectual disability, organic brain syndrome, emotional or mental illness, and specific learning disabilities.

Major Life Activity – Major life activities are broadly defined and include, but are not limited to: caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working.

Major Bodily Function – Major bodily functions are included under the term major life activity. Examples of major bodily functions include, but are not limited to: functions of the immune system, normal cell growth, and digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

State Licensed Healthcare Professional – This term refers to an individual who is authorized to write medical prescriptions under State law. According to 225 ILCS 85/3, prescriptions must be issued by one of the following in the State of Illinois: a physician licensed to practice medicine in all of its branches, a physician assistant (in accordance with subsection (f) of Section 4), or an advanced practice nurse (in accordance with subsection (g) of Section 4).

Medical Statement – A written statement from a State Licensed Healthcare Professional supporting a request for a meal modification for a child with a disability. Program regulations require SFAs to provide modifications to meals for children with disabilities when medical statements are provided. More details on what must be provided by a medical statement can be found in the sections that follow. A sample *Medical Authority Modified Meal Request Form* can be found on ISBE’s [Accommodations webpage](#).

Preference – A preference is a requested meal modification, within or outside current meal pattern requirements, that is not related to a disability situation (e.g. cultural, religious, and ethical preferences). Preference for a meal modification can be requested, but SFAs may decline such requests.

Students with Mental or Physical Impairment or Disability

After the passage of the Americans with Disabilities Amendments Act, most physical and mental impairments constitute a disability. A physical or mental impairment need not be life threatening to constitute a disability; it is enough that it limits a major life activity. For example, digestion is an example of a bodily function that is a major life activity. A child whose digestion is impaired by lactose intolerance may be a person with a disability regardless of whether or not consuming milk causes the child severe distress. Further, an impairment may be covered as a disability, even if medication or another mitigating measure may reduce the impact on the impairment. Whether a physical or mental impairment constitutes a disability must be determined on a case-by-case basis. The determination must be made without regard for whether mitigating measures may reduce the impact of the impairment.

Students Without Mental or Physical Impairment or Disability

Meal modifications may be requested for children without a physical or mental impairment or a disability. SFAs are encouraged to consider children’s cultural, religious, and ethical preferences when planning and preparing meals. FNS encourages schools to provide a variety of foods for children to select from in order to accommodate food preferences, which helps to maintain participation in the NSLP and SBP. If requested accommodations are considered reasonable, SFAs may honor the requested meal modification. When providing a substitution for a child without a disability, the substitution must be consistent with the meal pattern requirements for the meal to be reimbursable. However, SFAs are not required to accommodate meal modification requests related to a preference.

Modifications Within the Meal Pattern

SFAs may receive reimbursement for a meal modification request without a medical statement when the modification can be made within the program meal pattern. For example, if a child has

an allergy to one fruit or vegetable, the SFA can simply substitute another fruit or vegetable in the child's meal. In situations where the SFA does not obtain a medical statement, FNS strongly encourages SFAs to make note of the actions taken to accommodate a child's disability. Local agencies may choose to require a medical statement for meal modifications within the program meal pattern. Maintaining a medical statement on file is highly recommended although not required at the Federal or State level. Doing so helps to safeguard children in all areas of the school environment and protects children in situations where substitute staff members who may be unfamiliar with their needs are working in the cafeteria.

Modifications Outside the Meal Pattern

SFAs must obtain a medical statement from a State Licensed Healthcare Professional to receive reimbursement for meal modifications when the modified meal does not meet program meal pattern requirements. For example, a child may require portion sizes larger than those outlined in the program meal pattern requirements to accommodate a disability, in which case the SFA must keep on file a written medical statement supporting the meal modification with a State Licensed Healthcare Professional's signature. More information on what is required in a written medical statement is located in the following section.

Medical Statement Requirements

The medical statement should include a description of the child's physical or mental impairment that details how it restricts the child's diet. It should also include an explanation of what must be done to accommodate the disability. In the case of food allergies, this means identifying the food(s) to be omitted and recommending alternatives. In other cases, more information may be required. For example, if the child would require caloric modifications or the substitution of a liquid nutritive formula to accommodate a disability, this information must be included in the statement. A sample *Medical Authority Modified Meal Request Form* to be completed by a State Licensed Healthcare Professional can be found on ISBE's [Accommodations webpage](#).

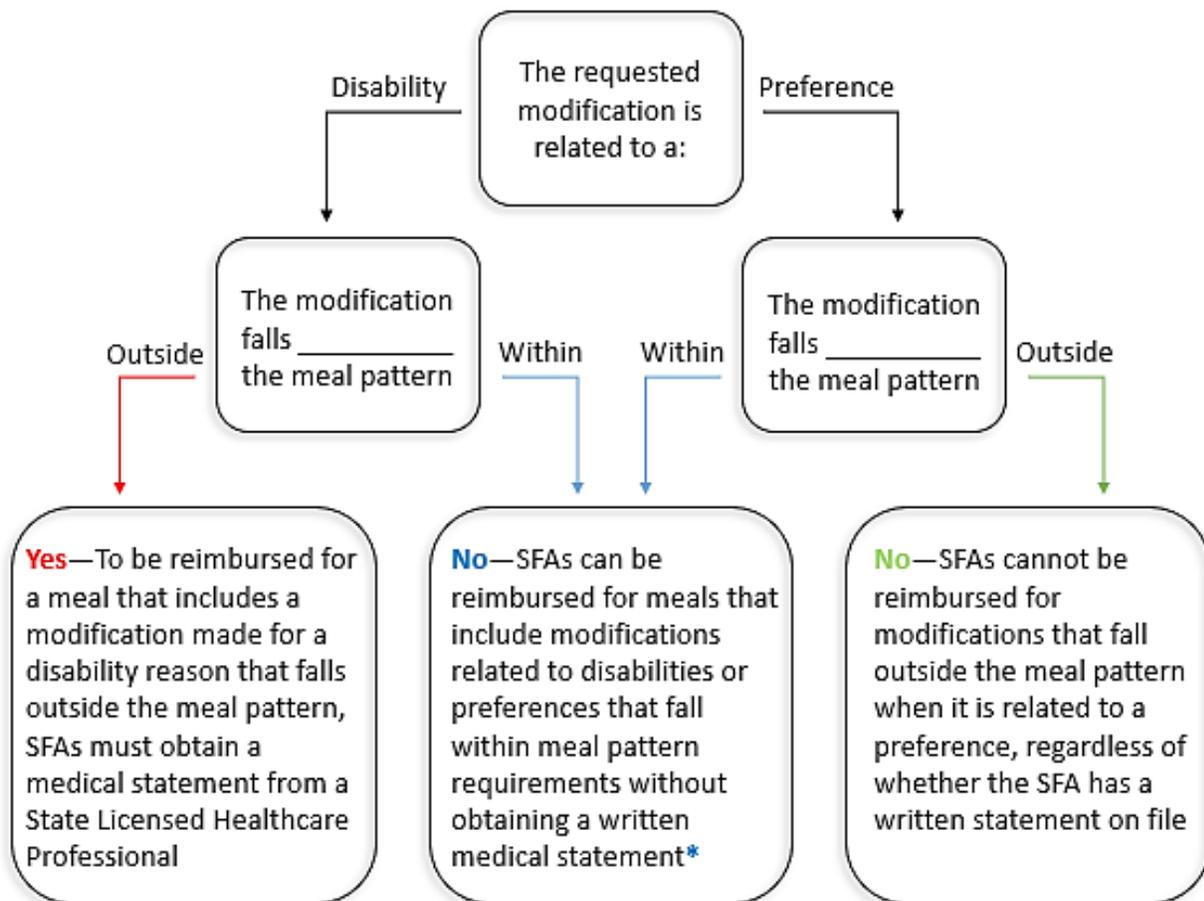
If a medical statement is provided and does not fully explain the modification needed, the SFA should immediately contact the child's parent/guardian for guidance and ask the family to provide an amended medical statement as soon as possible. However, clarification of the medical statement should not delay the SFA from providing a meal modification. SFAs should follow the portion of the medical statement that is clear and unambiguous to the greatest extent possible, while obtaining the additional information.

USDA does not require SFAs to obtain updated medical statements on a regular basis. Once the medical statement is accepted, SFAs will continue to receive reimbursement as long as the medical statement is on file. However, SFAs are responsible for ensuring that medical statements on file reflect the current dietary needs of participating children and may require updates as

necessary to meet their responsibilities. SFAs should carefully consider the burden obtaining additional medical statements could create for parents/guardians when establishing such requirements.

If a child who previously required a meal modification no longer requires modified meals, SFAs are not required to obtain written documentation from the State Licensed Healthcare Professional rescinding the original medical order. However, FNS does encourage SFAs to maintain documentation when ending a meal modification. For example, an SFA could ask the child’s parent/guardian to sign a statement indicating their child no longer needs a meal modification before ending the modification.

Is a medical statement needed to be reimbursed for a meal modification?



*While not required for a modification that meets meal pattern requirements, SFAs are highly encouraged to maintain a medical statement on file for modifications related to a disability to safeguard the student

Fluid Milk Substitutions

Fluid milk substitutions are among the most common menu variations for SFAs. SFAs must inform the State Agency of any schools opting to provide a milk substitute(s) [7 CFR 210.10(m)(2)(ii)] and must ensure milk substitutions meet FNS nutrient requirements (see chart below). For example, low-fat or fat-free lactose-free milk, or reduced-lactose milk, would meet the nutrient requirements.

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

SFAs will not receive Federal reimbursement for a meal that substitutes juice or water for milk for a non-disability reason. If a child's medical statement indicates the child cannot consume milk due to a disability, and requests the child receive a substitute, the SFA must provide the requested substitute regardless of whether it meets the nutrient requirements. In a disability situation, the SFA will continue to receive reimbursement for the meal based on the signed medical statement. A child whose digestion is impaired by lactose intolerance may be a person with a disability regardless of whether or not consuming milk causes the child severe distress. Further, an impairment may be covered as a disability, even if medication or another mitigating measure may reduce the impact on the impairment.

Offer Versus Serve

At schools participating in offer versus serve (OVS), children with disabilities must have the option to select all food components/items made available to other children. SFAs cannot accommodate a child's disability by asking the child to exclude a food component/item from their selection. For example, a child who has Celiac disease or a gluten intolerance must have a choice of a grain item that is gluten-free. The SFA may not use OVS to eliminate a specific food component for a child with a disability.

Employee Requirements

According to 7 CFR 15b.6, LEAs employing 15 or more individuals must designate at least one person to coordinate compliance with disability requirements. This person is often referred to as the Section 504/ADA Coordinator. Additionally, these LEAs must ensure their Procedural Safeguards process provides for a prompt and equitable resolution of grievances. LEAs are strongly encouraged to develop a Section 504/ADA Team to encourage information sharing throughout the school and to better help protect children. This team may include school food service professionals and nutritionists, administrators, school medical personnel, teachers, classroom aides, support personnel, parents/guardians, students, or other school officials with relevant experience.

Plant-Based School Lunch Option

Beginning **August 1, 2023** under HB4089 (Plant-based school lunch option), public school districts participating in the National School Lunch Program will be required to provide a plant-based school lunch option to students who submit a prior request. Plant-based options offered must meet applicable NSLP meal pattern and nutrition requirements. SFAs may meet this requirement by regularly incorporating plant-based options into their planned menu, or by providing these options on a case-by-case basis.

Common plant-based alternatives that may credit toward the meat/meat alternate component in the NSLP include, but are not limited to: nuts/seeds, nut/seed butters, beans/peas (legumes), and tofu and soy-based products. When incorporating plant-based options into an NSLP meal, SFAs should refer to Child Nutrition (CN) labels or Product Formulation Statements (PFS) for information on contributions to the meal pattern. *Chapter C—Menu Planning & Meal Pattern Requirements* of this handbook provides more information on crediting meat/meat alternate food items and how to use product labels. Additionally, the following USDA memos may assist SFAs with crediting the applicable items:

- [SP 53-2016](#)--Tofu and soy yogurt products
- [SP 25-2019](#)--Tempeh
- [SP 26-2019](#)--Pasta made from legume flour

Reviews

Reviews

School Food Authority Reviews	L-1
On-Site Review Requirements.....	L-1
After-School Care Snack Program	L-2
Local Health Department Reviews.....	L-2
Illinois State Board of Education Reviews	L-3



Additional Resources

- ISBE Monitoring and Review Information Website
<https://www.isbe.net/Pages/School-Nutrition-Monitoring-and-Review.aspx>

School Food Authority Reviews

On-Site Review Requirements

National School Lunch Program (NSLP) and School Breakfast Program (SBP) regulations require each school food authority (SFA), with more than one site where reimbursable meals are served, to annually conduct their own review of each site's meal count and claiming procedures. All NSLP sites must be reviewed and for the SBP sites, a school shall perform on-site reviews at a minimum of 50% of their sites that serve breakfast.

EXAMPLE:

A SFA has 12 sites, all of which are in SBP and NSLP. All 12 sites must receive on-site reviews of their NSLP and 6 of those sites must receive on-site reviews of their SBP. The other 6 SBP sites that did not get on-site reviews would need to receive on-site reviews of their SBP the following year.

ISBE recommends even districts with one site perform an annual on-site review of meal counting and claiming procedures.

This review must be completed by February 1 of each school year for each site. The individual should be familiar with program rules and should be outside the daily operations to provide an objective look at the operations. The review must be conducted by SFA personnel and may not be conducted by contracted parties who are providing the meal service. A sample copy of the [On-Site Review Form](#) is available on our website.

A copy of the on-site review must be maintained on file at the site or SFA office for three years plus the current year or, in the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed.

If the review disclosed problems, the SFA must correct problems immediately and conduct a follow-up review within 45 calendar days of the initial review. A follow-up review must be conducted to determine if the corrective action resolved the problem. Written documentation is required to be maintained at the SFA or at the site.

On-site reviews are conducted to ensure at each meal service claimed, the following internal controls are operating correctly:

- Daily meal counts by category are taken at the point of service
- All meals claimed meet meal pattern requirements
- Overt identification is prevented
- Sanitation procedures are followed

After-School Care Snack Program

For those participating in the After-School Care Snack Program through the NSLP, the SFA must review each site two times per year. The SFA must conduct the first review during the first four weeks of operation each school year. The reviews ensure reimbursable snacks are provided and served to eligible students and acceptable counting procedures have been implemented.

Documentation must be maintained on file for three years plus the current year. A copy of the [After-School Care Snack Sites Review Form](#) is available on our website.

Local Health Department Reviews

Annual Sanitation Reviews

Each school year SFAs must obtain two food sanitation inspections for each site where food is prepared or served. For most counties, the local health department will conduct such inspections. If the SFA is in a county that does not have a local health department, then the SFA must contact neighboring county health departments to conduct food sanitation inspections. Copies of these inspections must be maintained at the SFA or at the site for three years plus the current year. The most recent food sanitation report must be posted in a prominent location that is viewable by the general public.

If an SFA has not received the food sanitation inspections by March 31, a letter must be written to the local health department requesting the required two food sanitation inspections for each site where food is prepared or served. The letter must be maintained at the SFA or at each site as documentation of your attempt to comply with two food inspections as required by USDA regulations.

Illinois State Board of Education Reviews

Administrative Reviews

The USDA requires ISBE to conduct administrative reviews of all SFAs participating in NSLP. Administrative reviews are comprehensive on-site evaluations conducted, at a minimum, once every three years.

The review process includes an evaluation of the critical areas and general areas of review.

Critical Areas

- Access and reimbursement
 - Household Eligibility Applications
 - Direct Certification
 - Community Eligibility Provision (CEP)
 - Benefit issuance
 - Verification
 - Meal counting, claiming and reimbursement
- Nutritional quality and meal pattern
 - Dietary specifications and nutrient analysis
 - Meal components and quantities
 - Offer versus Serve (OVS)

General Areas

- Resource management
 - Nonprofit food service account
 - Paid lunch equity
 - Revenue from nonprogram foods
 - Indirect costs
- General program compliance
 - Civil rights
 - Food safety
 - Local wellness policy and school meal environment
 - Professional standards
 - Reporting and recordkeeping
 - SBP, SSO and SFSP outreach
 - SFA on-site monitoring
 - Smart snacks
 - Water

- Other program reviews
 - Afterschool Snack Program
 - Fresh Fruit and Vegetable Program
 - Seamless Summer Option
 - Special Milk Program

A written report will be sent to the SFA detailing the review findings and any fiscal adjustments. The SFA must respond to the review findings with a corrective action plan that defines the processes and procedures the SFA will implement to ensure compliance with program regulations. The corrective actions must be implemented for all sites in the SFA. A follow-up review may be conducted to ensure that identified areas of concern were corrected.

An [Administrative Review Checklist](#) is available to assist SFA's in preparing for an administrative review.

Financial Management: Resource Management

Financial Management: Resource Management

Maintenance of Nonprofit School Foodservice Accounts M-1
Meal Pricing: Paid Lunch Equity (PLE) M-3
Revenue from Nonprogram Foods M-5
Indirect Cost M-8



Additional Resources

- ISBE Nutrition Monitoring and Review Information
<https://www.isbe.net/Pages/School-Nutrition-Monitoring-and-Review.aspx>

Maintenance of Nonprofit School Food Service Accounts

Revenues received by the nonprofit school food service account are to be used only for the operation or improvement of food service operation, except that such revenues shall not be used to purchase land or buildings or to construct buildings. General expectations for uses of net cash resources/excess cash: better quality foods, updating equipment, more staffing or increased salaries.

Revenues looked at during review against expenses, found in the Annual Financial Report (Non-public schools must be able to show as well):

- Sales to Pupils – Lunch (Acct # 1611)
- Sales to Pupils – Breakfast (1612)
- Sales to Pupils – A la Carte (1613)
- Sales to Adults (1620)
- Other Food Service (Describe & Itemize) [(1620) Fundraisers, Vending, and Catering]
- State Free Lunch & Breakfast (3360)
- National School Lunch Program (4210)
- School Breakfast Program (4220)
- Summer Food Service Program (4225)
- Child Adult Care Food Program (4226)
- Fresh Fruits & Vegetables (4240)

Carryover balance from Previous School Year
+ Total Revenues - Total Expenses =
Profit or Loss

Total Expenses included everything under Food Services [Accounting Function # 2560, under Support Services – Business (Two lines)] on the Annual Financial Report. Nonpublic entities must maintain records of this as well to include; Salaries and Benefits, Purchased Goods and Services and any capital expenses charged to the food program.

The SFA shall limit its net cash resources (profit) to an amount that does not exceed three months average expenditures for its nonprofit school food service. Equation for net cash below:

Expenses ÷ Months of Operation x 3 =
Net Cash Resources

Again, general expectations for uses of net cash resources: better quality foods, updating equipment, more staffing or increased salaries.

If school food service account funds are used to purchase non-program foods for sale outside a meal period(s) or outside a food service area(s) during meal periods, such purchases must be self-sustaining. This means funds must be deposited in the school food service account in an amount sufficient to cover all direct and indirect costs relating to the purchase and service of non-program foods with school food service account funds. This does include labor for foods prepared for school events or catering. Records documenting the recovery of these costs must be maintained and available for review.

During a review, a 10% sample (one continuous month or sporadic selection) of invoices will be done to ensure purchases for the SFA are allowable. If the 10% sample finds unallowable expenses, all invoices may be requested for review. In the event of unallowable expenses, repayment must be made to the Nonprofit School Foodservice Account above a \$600 threshold. If total unallowable expenses are \$599 or below, technical assistance will be granted. In the event unallowable purchases are found, a corrective action plan must be put in place for the Nonprofit School Foodservice Account to be restored.

Equipment purchases over \$5,000 should be approved by ISBE's Nutrition Department, UNLESS the equipment is on the [pre-approved equipment list](#). If a district seeks to purchase equipment not on this pre-approved list, they must email details of the item for purchase, along with cost, to cnp@isbe.net. Any purchase over \$5,000 up to \$9,999 will require 3 bids/quotes prior to purchase. Equipment purchases over \$10,000 will require going out to bid. If during a review, any equipment purchases are identified as unallowable, ISBE is required to disallow these purchases and implement their debt collection procedures.

If the SFA received a USDA equipment grant award within prior three years, invoices for purchases must be maintained. If the grant award was higher than needed, a refund must be given back to the state agency.

* Equipment is defined as tangible personal property (including information technology systems) having a useful life of one year or longer and a per-unit acquisition cost that equals or exceeds the lesser capitalization level established for financial statement purposes (the lesser of \$5,000 or local level regulations).

Meal Pricing: Paid Lunch Equity (PLE)

Meals served during the 2022-23 school year will return to National School Lunch Program reimbursements and pricing.

Pricing of Free Meals

Children eligible for free meals must be offered one reimbursable meal at no charge. Second meals cannot be claimed for reimbursement. Second meals would fall under Revenue from Nonprogram Foods and would have to be charged at same rate for all students.

Pricing of Reduced-Price Meals

Children eligible for reduced-price meals must be offered one reimbursable meal at reduced rate. Second meals cannot be claimed for reimbursement. The current maximum prices for reduced-price meal, as per Federal Regulation §245.2, are:

- 40 cents for lunch
- 30 cents for breakfast
- 15 cents for after-school snacks

https://www.isbe.net/Documents/school_reimbursement-fy23.pdf

Pricing of Paid Meals

Paid breakfast and after-school snack prices are at the discretion of the local SFA. Some basic considerations before establishing a price for a paid student: daily revenue, cost of food, cost of labor, including per hour fringe benefits, and cost of overhead and any other costs.

Paid lunch prices are established using the Paid Lunch Equity tool. School Food Authorities must ensure that schools are providing the same level of support for paid lunches as they are for free lunches. Therefore, weighted average price across the SFA charged for paid meals must be moving towards the difference between the current year's free and paid reimbursements. The SFA may however charge more for paid lunches.

If a district is charging on average less than \$3.56 [difference between 2022-23 federal reimbursement provided for free lunches (\$ 4.03) and the federal reimbursement provided for paid lunches (\$.47)] for a paid lunch in School Year 2022-23, it must make up the difference in the level of funding to the program by either:

1) Gradually increase paid meal prices. The USDA/ISBE cannot require a school to increase by more than \$0.10 per meal, however a district can increase by as much as it feels is warranted to meet program requirements. The district need not increase paid meal prices across all schools. In other words, paid lunch prices can vary by school (e.g. charging lower prices in lower-income area or charging lower prices in elementary vs secondary) if the average revenue requirement is met across the district.

OR

2) In lieu of raising prices, provide additional non-federal support (state and local funding) to the non-profit food service account to make up the difference between \$3.56 and what is currently being charged for a paid meal on average across the district.

OR

3) Combination of increasing price and contributing non-federal funds to the non-profit school food service account.

OR

4) File for a Paid Lunch Equity Exemption approved by USDA/ISBE

To determine how much a district is required to increase its weighted average paid meal price and/or how much non-federal funding it is required to contribute it must complete the Paid Lunch Equity Calculator. This calculator for Paid Lunch, as well as Nonprogram Foods is available using the following link: <https://www.isbe.net/Pages/Paid-Lunch-Equity.aspx>

Paid Lunch Equity Exemption

There are two applicable exemptions available to SFAs currently for the 2022-23 school year:

- Net Cash Resources Exemption

In the event that raising lunch prices will put Net Cash Resources over the three month limit, an Exemption Request Form to not raise prices can also be found at the following link.

<https://www.isbe.net/Documents/PLE%20Exemption%20Request%20SY17-18.pdf>

- Zero/Positive Balance Account Exemption

In Section 767, of Division A of the Appropriations Act, for school year 2022-2023, only a school food authority that had a negative balance in the nonprofit school food service account as of June 30, 2022, shall be required to establish a price for paid lunches served through the National School Lunch Program (NSLP) in accordance with section 12(p) of the Richard B. Russell National School Lunch Act ([42 USC 1760\(p\)](#)).

*****USDA has approved a statewide waiver for Illinois that allows all School Food Authorities, regardless of account balance, to not be required to increase lunch prices for the 2022-23 school year. The same exemption as the Zero/Positive Balance Account Exemption. *****

Revenue from Non-Program Foods

School food service account funds are intended to purchase food for reimbursable meals. The Healthy Hunger Free Kids Act of 2010 establishes requirements for school district revenue when foods sold outside of reimbursable meals are purchased with school food service account funds. The purpose of the Non-Program Revenue requirement is to ensure revenues from the sales of non-program foods cover food cost in the SFA food service account.

Non-program food includes, but is not limited to:

- A la carte items
- Adult meals
- Fundraisers
- Vending machines
- Seconds of entrée items* (not fruits or vegetables)
- Catering (Catering meals to off-site locations; private schools, special education centers or any other facility within the district that does or does not receive NSLP monies)

This would not include accidental over production and service of meal items which total less than 10% of total meals prepared (i.e. 100 meals prepared, only 90 meals claimed).

Pricing of Non-program Foods and Beverages

Any food or beverage sold in a participating school outside of the reimbursable meal and purchased using school food service funds is considered a competitive food including a la carte items, second entrees, vending, and school stores. (See section entitled *Sale of Foods and Beverages*.) The USDA requires that each SFA limit competitive foods to encourage consumption of the reimbursable meals.

Therefore, when pricing non-program items and adult meals, the SFA must set prices at a level high enough to:

- Encourage students to select the reimbursable school lunch or breakfast meal, and
- If food is purchased using school food service funds, generate at least the same proportion of SFA revenues as they contribute to the SFA food costs. The price must recover all the costs involved in the item including labor, overhead, paper supplies, value of USDA-donated foods used in preparation, etc. and should reflect a profit on the item.

EXAMPLE

IF:

The total operating costs (food, labor, paper products, overhead, etc) is \$800,000 of which \$400,000 is for food (\$50,000 non-program foods and \$350,000 reimbursable meals).

The total revenue is \$800,000.

THEN:

The proportion of non-program food cost is 12.5% ($\$50,000/\$400,000$). Therefore, the required revenue from non-program foods would need to be at least 12.5% of total revenue or \$100,000 ($.125 \times 800,000$).

A Non-Program Food Revenue Tool was created to help SFAs calculate the amount of revenue required and is available at <https://www.fns.usda.gov/guidance-paid-lunch-equity-and-revenue-nonprogram-foods>. Use the Non-Program Revenue Tool to:

- Ensure that a high enough fee is being charge to cover the cost of non-program foods.
- Ensure that enough money is being contributed from the general fund into the school food account to cover the cost of seconds.

All students must be charged the same price for each non-program food and beverage regardless of the eligibility status of the student; only the reimbursable meal must be provided free or at a reduced price for those that qualify. All students must be charged for second entrees according to the established price set by the SFA.

Nonprogram Foods with an FSMC

For an SFA under a Food Service Management Contract to be in compliance on Nonprogram Foods, their A la carte Equivalents Fee **MUST** be below the annual A la carte Equivalency Factor unless stated otherwise within the terms of your original contract. Annual A la carte equivalency factors can be found on the School-Based Child Nutrition Programs, Rates of Reimbursement. <https://www.isbe.net/Pages/Seamless-Summer-Option-Eligibility-Information.aspx>

Adult Meals

Meals served to adults who are directly involved in the operation and administration of the school nutrition programs may, at the discretion of the school food authority, be furnished at no charge. As such, their costs may be fully attributed to and supported by the nonprofit food service operation. Meals served to these adults may not be claimed for reimbursement or counted towards the donated foods entitlement.

For FY24, meals served to adults must be charged at a minimum \$0.50 over the highest lunch price/reimbursement served in the district.

[The \$0.50 is based on the Planned Assistance Level (Entitlement and Bonus) given as part of reimbursement with the commodities section (\$0.43 for 2022-23), combined with the \$0.08 received for menu certification for a rounded down requirement.]

EXAMPLES

For nonpricing programs [or CEP (Community Eligibility Provision)], where there is no charge to students for the meals, the \$0.50 charge must be over the free reimbursement rate:

FY23 Free reimbursement is \$4.01 for School Lunch & Supper Program – Less than 60%

FY23 Free reimbursement is \$4.03 for School Lunch & Supper Program – **60% or more Eligible**

Free Reimbursement \$4.01 (or **\$4.03 depending on reimbursement rate**) + \$0.50 adult meal coverage equals adult meal price \$4.51 (or **\$4.53**) is the minimum price for adult meals in 2023-24 (rounded down to \$4.50).

For Pricing programs (non CEP), where the district sets prices based off the Paid Lunch Equity (PLE) tool, the \$0.50 charge must be over the highest student price.

Paid lunch prices by the SY 2022-23 Weighted Average Price Calculator on PLE Tool

Monthly # of Paid Lunches	Paid Lunch Price	Monthly Revenue	Weighted Average Price
40,229	\$2.45	\$98,561.05	
37,672	\$2.60	\$97,947.20	
298	\$2.70	\$804.60	
45,223	\$2.70	\$122,129.10	
123,432		\$319,441.95	\$2.59

Highest student price in district \$2.70 + \$0.50 adult meal coverage equals adult meal price \$3.20.

Indirect Cost

First and foremost, the meaning of Indirect cost is that of benefit to the Food Service Department and the school district. The School Food Service accounts are made up of Direct Costs and Indirect Costs. Direct costs are those of the wages and benefits of the direct staff, food and products purchased, and other supplies used only in the program. Indirect Costs are those distributed throughout the school building with a portion used in the cafeteria.

The use of Indirect Cost is to take revenue away from the Food Service account and put it back towards the school district funds. One of the key situations in when to use Indirect Cost is if the Nonprofit School Food Service accounts seems near the point of going over the 3 month threshold of revenue.

Indirect cost is a mechanism of sharing the cost associated with running the schools. Every school has power, gas, trash and water supply coming in and out of the school. The Indirect Cost method is a way for the Food Service Department to pay their share. Custodial Services, Trash Collection, Utilities (gas, electricity, water, etc.), personnel's time used for accounting services of the food service program, payroll services, Workers' Compensation, and post-retirement health benefits are examples of when indirect cost can generally be used.

ISBE determines the Indirect Cost rate for each district for 2021-22 which can be found at this link: <https://www.isbe.net/Pages/Indirect-Cost-Rate-Plan.aspx>

The "Unrestricted Rate" is the rate that is solely used for the Food Services section. If your district is not listed, you are allowed to use the State Indirect Cost Rate with the RCDT Number listed 9999999999 at the top of the form. Each year, the rates change, so please refer to the list each year if you plan to use Indirect Cost.

Non-public schools would not be found on the list of schools in the indirect cost rate plans, as they are not required to submit Annual Financial Reports. Non-public schools are allowed to use the de minimis rate of 10% as found in 2 CFR 200.414 [Indirect Cost](#). Outside of this rate, a non public school may use a Cost Allocation Plan, which requires documentation of exact square footage of property and approval by the state agency.

Questions to ask when determining whether a cost is direct or indirect:

- Does the cost benefit multiple programs or other cost objectives, or solely the school food service?
- Does the cost have a direct relationship to the school food service?
- What guidance do the Federal cost principles provide for this cost?
- How are similar costs treated in other cost objectives of the SFA?
- How has the cost been treated historically by the SFA?

Questions to ask when determining your SFA's need to implement the use of indirect cost:

- Is my SFA near the 3 month expense threshold in our Maintenance of the Nonprofit School Food Service Account?
- Will the SFA School Food Service Account still be profitable after withdraw?

If the answer to either of those questions would be 'no,' indirect cost would not be useful to the SFA.

Procurement

Procurement

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Additional Resources

- ISBE Nutrition Financial Management website
<https://www.isbe.net/Pages/Nutrition-Financial-Management.aspx>

Rules and Regulations

This procurement guidance and requirements is for all Child Nutrition Programs, including School Nutrition Programs (such as the National School Lunch Program, Special Milk Program, and School Breakfast Program), the Summer Food Service Program, and the Child and Adult Care Food Program. Procurement means the process of obtaining goods and/or services in accordance with applicable rules and regulations. Procurement rules ensure that program benefits are received by eligible schools and participants, and that taxpayer dollars are used effectively and efficiently, with no waste or abuse. Regulations require that all purchases made, whether funded wholly or in part with Child Nutrition Program funds, comply with all federal, state, and local procurement requirements.

All procurement transactions must be conducted in a manner that provides maximum open and free competition. Procurement procedures must ensure they do not foster noncompetitive practices between firms, do not create organizational conflicts of interest, and do not restrict or eliminate competition. Procurement must not place unreasonable requirements on firms, require unnecessary experience, or establish unrealistic bonding requirements. There must be descriptions of all products purchased and identical instructions provided to all potential vendors.

2 CFR 200.323(d): Cost plus a percentage of revenue and/or expenses contracts are not allowable.

Formal standards of conduct should govern the performance of officers, employees, and agents in the award and administration of contracts. These standards should provide that officers, employees, or agents should not solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties of sub-agreements.

LOCAL

- School Food Authority/ Sponsoring Organizations may set more restrictive purchasing thresholds per board/local policy and documented in written procurement procedures.

STATE

- [105 ILCS 5/10-20.21](#): The Illinois Public School Code on Contracts

FEDERAL

- [2 CFR 200](#): Uniform Administrative requirements, Cost Principles and Audit Requirements for Federal Awards
- [7 CFR Part 210](#): National School Lunch Program
- [7 CFR Part 215](#): Special Milk Program
- [7 CFR Part 220](#): School Breakfast Program
- [7 CFR Part 225](#): Summer Food Service Program
- [7 CFR Part 226](#): Child and Adult Care Food Program

Procurement Methods

Methods by which goods and/or services may be obtained. The primary contracting methods used by the federal government are micro-purchasing, informal (small) purchase, and formal (large) purchase.

When procuring goods and services for the Child Nutrition Programs, a School Food Authority (SFA) must determine whether they must use an informal or formal procurement method. It is important to understand and then identify which method best meets the needs of your individual food service operation. Informal procurement occurs when an SFA's purchases fall at or below the federal, state, or local small purchase threshold (whichever is more restrictive).

INFORMAL

Procurement by informal purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$ 250,000 (or a lower amount as required by local/district board policy). Also known as simplified acquisition or informal purchase. Although this method is permitted when the amount of a purchase falls at or below the most restrictive small purchase threshold, an SFA could choose to use the formal procurement method (see below for more information) rather than the informal procurement method. There are two types of formal procurement:

1. **Micro-purchasing:** Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$ 10,000.
 - Micro-purchases may be awarded without soliciting competitive price or rate quotations, if the Program Operator considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly. ([2 CFR 200.320\(a\)\(1\)\(ii\)](#))
 - Should distribute micro-purchases equitably among qualified suppliers.
 - Simple purchase.
 - Maintain all documents on file for potential audit purposes.
 - Per USDA guidance "[Updates to the Federal Micro-Purchase Threshold in 2 CFR 200.320\(a\)\(1\) SP 02-2022](#)," program operators have the discretion to utilize the micro-purchase method of procurement for purchase up to \$50,000 if specific criteria are met.
 - SFA's are "responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk and its documented procurement procedures." To assist, complete the "[Increased Micro-Purchase Threshold Worksheet](#)" and maintain on file.
 - This option is not applicable to Food Service Management Company (FSMC) contracts. All FSMC contracts must be formally procured utilizing the [three-step process described on our website](#).
2. **Small purchase:** Procurement by small purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed \$ 250,000 (or a lower amount as required by local/district board policy). Also known as simplified acquisition or informal purchase.

- In applying the small purchase threshold, the SFA must adhere to the most restrictive, lowest limit set.
- Develop a written purchase description of the services/items being solicited;
- Solicit quotes/bids from an adequate number of qualified sources potential vendors based on the purchase description; document vendor names along with the date and method of contact - be sure to maintain free and open competition;
- Obtain price quotes from a minimum of three qualified vendors, hence this method also being called 3 bids and a buy.
- Record all quotes/bids received and any notification received from vendors declining to bid;
- Evaluate the quotes for conformance to the purchase description;
- Award the purchase/contract (record the justification for the award); and
- Maintain all documents on file for potential audit purposes.

FORMAL

Procurement by formal purchase is the acquisition of supplies or services, the aggregate dollar amount of which does exceed \$ 250,000 (or a lower amount as required by local/district board policy). Also known as simplified acquisition or informal purchase. There are two types of formal procurement:

1. **Sealed Bid/ Invitation for Bid (IFB):** This is a procurement method in which bids are publicly solicited through an invitation and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid conforms with all the material terms and conditions of the invitation and is the lowest in price. The sealed bids procurement method is preferred for procuring construction services.
 - Bids must be solicited from an adequate number of qualified sources, providing them with sufficient response time prior to the date set for opening the bids. Unless specified by the Federal agency, the recipient or subrecipient may exercise judgment in determining what number is adequate. For local governments, the invitation for bids must be publicly advertised.
 - The invitation for bids must define the items or services with specific information, including any required specifications, for the bidder to properly respond;
 - All bids will be opened at the time and place prescribed in the invitation for bids. For local governments, the bids must be opened publicly.
 - A firm-fixed-price contract is awarded in writing to the lowest responsive bid and responsible bidder. When specified in the invitation for bids, factors such as discounts, transportation cost, and life-cycle costs must be considered in determining which bid is the lowest. Payment discounts must only be used to determine the low bid when the recipient or subrecipient determines they are a valid factor based on prior experience.
 - The recipient or subrecipient must document and provide a justification for all bids it rejects.

2. **Request for Proposal (RFP):** This is a procurement method used when conditions are not appropriate for using sealed bids. This procurement method may result in either a fixed-price or cost-reimbursement contract. They are awarded in accordance with the following requirements:

- Requests for proposals require public notice, and all evaluation factors and their relative importance must be identified. Proposals must be solicited from multiple qualified entities. To the maximum extent practicable, any proposals submitted in response to the public notice must be considered.
- The recipient or subrecipient must have written procedures for conducting technical evaluations and making selections.
- Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the recipient or subrecipient considering price and other factors.

INFORMAL VERSUS FORMAL

When the estimated dollar value of the contract and/or purchase meets one of the following criteria:

- Public Schools: purchase of perishable foods and beverages is greater than \$250,000.
- Public Schools: purchase of non-perishable food/supplies/equipment/services is greater than \$35,000.
- Non-Public Schools and non-school participants: purchases above \$250,000.

**Note that these are the federal and state thresholds, if your SFA has a more restrictive amount, the more restrictive amount must be followed.*

***Note, as per [Public Act 102-1101](#), public schools are only permitted to utilize the RFP method if the SFA gives scorable preference to ALL five items listed within the bill.*

The estimate should be based on the estimated/planned value of the contract over the year. In general, purchases cannot be split to fall below the threshold. However, it is common/allowable to see separate procurements for a prime vendor and a separate procurement for bread and one for milk, but it is not allowable to split other items out of the prime vendor bid/proposal for the purpose of attempting to utilize the informal or micro-purchase procurement methods.

TYPES OF ITEMS	ANNUAL VALUE OF PURCHASES
Milk and/or fresh dairy products	In excess of \$250,000
Fresh bread	In excess of \$250,000
Fresh produce	In excess of \$250,000
General groceries	In excess of \$250,000
Vended meals	In excess of \$250,000
Supplies	In excess of \$35,000
Equipment	In excess of \$35,000
Services	In excess of \$35,000

General Procurement Requirements

All procurement transactions must be conducted in a manner that provides maximum open and free competition. Procurement procedures must ensure they do not foster noncompetitive practices between firms, do not create organizational conflicts of interest, and do not restrict or eliminate competition. Procurement must not place unreasonable requirements on firms, require unnecessary experience, or establish unrealistic bonding requirements. Cost plus a percentage of purchase is not an allowable system. There must be descriptions of all products purchased, and identical instructions provided to all potential vendors.

Code of Conduct Policy

Each SFA is required to have written standards of conduct covering conflicts of interest that prohibit officers, employees, and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors or parties of subcontracts. Procedures must provide for disciplinary actions for violations by officers, employees, or agents.

Procurement Procedures

Each SFA is required to have its own documented procurement procedures in place that reflect applicable state and local laws and regulations, provided that procurements made with Child Nutrition Program funds adhere to the standards set forth in 2 CFR 200.318(a).

- The SFA must have oversight procedures and documentation.
- The SFA must have written standards of conduct (see above).
- The procedures must avoid acquisition of unnecessary or duplicate items.
- The SFA must award contracts only to responsible contractors.
- The SFA must maintain records sufficient to detail the history of the procurement.
- The SFA must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold, including contract modifications.
- The SFA must take steps to assure that small, minority and women's businesses enterprises and labor surplus firms are used when possible.

Geographic Preferences

SFAs may use local (e.g., “locally grown”, “locally raised”, or “locally caught”) as a specification for local unprocessed agricultural products purchased for program meals, snacks, and milk. SFAs can require that an unprocessed agricultural product be locally grown, raised, or caught to meet the solicitation requirements and remove products or bids that do not meet this standard from consideration.

CNP operators may also continue to apply a geographic preference through additional points or credit during evaluation for local unprocessed agricultural products. This memo will now refer to this strategy as a “defined scoring advantage,” to help differentiate between the concept of a geographic preference option and the two strategies that may be used to implement it.

In summary, under the expanded geographic preference option, beginning July 1, 2024, SFAs may choose to:

- Use local as a specification (i.e., the written description of a product or service that a vendor must meet to be considered responsive to a solicitation) for local unprocessed agricultural products;

- Use a defined scoring advantage (e.g., additional credit or points given to local unprocessed agricultural products during the evaluation of responses to a solicitation) for local unprocessed agricultural products;
- Adopt a mix of both strategies; or,
- Elect not to use any of these approaches.

Buy American

School food authorities are required to adhere to the Buy American provisions found in federal regulations ([7 CFR 210.21\(d\)](#)). Actions an SFA should take to comply with these requirements are as follows:

- Include a Buy American clause in all procurement documents (product specifications, bid solicitations, purchase orders, etc.);
- Monitor contractor performance;
- Require suppliers to certify the origin of the product;
- Examine product packaging for identification of the country of origin; and
- Ask suppliers for information about the percentage of U.S. content in the food product.

Sample clauses for inclusion in procurement documents are available on the Nutrition Programs website at http://www.isbe.net/nutrition/htmls/contract_other.htm.

Solicitation Document Development

Federal regulations, [2 CFR 200.319\(a\)](#), prohibit the awarding of contracts to any person or entity that develops or drafts specifications, requirements, statements of work, invitations for bids, requests for proposals, contract terms and conditions or other procurement documents. In failing to fulfill its responsibilities to draft its own specifications and procurement documents, an SFA which copies a list of features or evaluation and ranking criteria drafted by a potential vendor and then permits that potential vendor to submit a bid/proposal has violated federal regulation 2 CFR 200.319(a). This pertains to all child nutrition program procurements, including software acquisitions.

While SFAs have broad discretion in gathering information for use in connection with procurements, information from potential offerors must be appropriately modified to develop tailored specifications; otherwise, these offerors must be excluded from competing for such procurements. This is to ensure objective contractor performance and eliminate unfair competitive advantage.

Contract Renewals

Contracts renewals, with price changes in the second and subsequent years, are allowed provided:

- The original contract is competitively solicited in accordance with federal and state regulations.
- The solicitation document clearly states price changes will be permitted after the first year of the contract.
- The maximum number of contract renewal terms is specifically stated in the solicitation document.

- All terms and conditions of the contract remain constant during the duration of the contract.
- The contract specifically states federal funding is not guaranteed beyond the end of the federal fiscal year.
- Strict limitations are placed on any price escalation by linking price increases to a recognized measurable index (such as the [consumer price index](#) or a market index). Flat percentages may not be used to define a maximum allowable increase but may be used to cap or limit an increase that is linked to a recognized measurable index.
- Vendors are required to document, through a provided detailed cost/price analysis, the need for price increases.

Protests

Any action that diminishes open and free competition seriously undermines the integrity of the procurement process and may subject any School Food Authority/ Sponsoring Organization to bid protests. School Food Authorities/Sponsoring Organizations are responsible for properly responding to protests and concerns raised by potential contractors. Pursuant to 2 CFR 200, School Food Authorities/Sponsoring Organizations must have protest procedures in place to handle and resolve disputes relating to their procurements and must in all instances disclose information regarding a protest to the Illinois State Board of Education Nutrition Department.

Food Service Management Company / Vended Meals Contracts

There are separate procurement requirements, which are not discussed in detail here, for SFAs contracting with food service management companies (FSMC) for management services or for Vended meal services. Please visit our [website](#) for detailed information.

While NSLP regulation [7 CFR Part 210.16](#) permits an SFA to contract with an FSMC to manage its school food service operations, the regulations prohibit delegation of certain duties. It is the SFA's responsibility to ensure its food service operation is in conformance with the SFA's agreement under the program. The SFA is responsible for:

- Observing limits on the use of nonprofit food service revenues including the use of nonprofit food service account funds, to pay only allowable costs regardless of the costs billed by the FSMC;
- Determining and verifying the eligibility of children for free and reduced-price meals;
- Ensuring only reimbursable meals are included on the Claim for Reimbursement regardless of the number of meals billed by the FSMC; and
- Not permitting the accrual of all income and expenses to the FSMC.
- Ensuring the validity of meal counting and claiming systems at the schools under its jurisdiction. An SFA is required to have specific procedures in place to determine the validity of meals claimed for reimbursement, including conducting an [On-Site Review](#) of each school prior to February 1 of each school year. If the review identifies problems with a school's meal counting or claiming procedures, the SFA shall ensure the school implements corrective action and, within 45 days of the review, the SFA must conduct a Follow-Up Review to determine if the corrective action resolved the problems. Whether an SFA self-operates its food services or uses an FSMC, the SFA must conduct the On-Site Review and remains responsible for ensuring deficiencies are identified and effective actions are taken to correct any deficiencies found.

Purchasing Equipment

The [OMB guidance](#) and U.S. Department of Agriculture (USDA) regulations at [2 CFR 200.313](#)  define "equipment" as tangible personal property (including information technology systems) having a useful life of one year or longer and a per-unit acquisition cost that equals or exceeds the lesser capitalization level established for financial statement purposes, \$10,000, or a lower threshold set by local level regulations.

During administrative reviews required by [7 CFR 210](#), [7 CFR 215](#), [7 CFR 225](#), and [7 CFR 226](#) and procurement audits as required by [2 CFR 200.501](#), ISBE will review equipment purchases, ensuring purchases were made based on either the approved equipment list or the ISBE prior approval process. If equipment purchase(s) are deemed unallowable during any audit or review process, ISBE may disallow the purchase(s) and require the SFA/ Sponsoring Organization to replenish the non-profit school food account as appropriate.

Costs associated with remediation or repair to the facility (i.e., plumbing, heating, air conditioning, construction, etc.) that would add to the permanent value of the facility are unallowable. These costs should be borne by the School Food Authority's/ Sponsoring Organization's general fund.

All equipment purchased must be deemed necessary, reasonable and allocable ([2 CFR 200.403](#), [2 CFR 200.404](#), [2 CFR 200.405](#)) for proper and efficient performance and administration of the Child Nutrition Programs (CNP) prior to purchasing.

- [Purchasing Equipment Process Overview](#) 
- [ISBE Pre-Approved Equipment List](#) 
- [Equipment Purchase Attestation Form](#)  (for equipment purchased on the pre-approved list)
- [Equipment Purchase/Capital Expenditure Request Form](#)  (for equipment purchased **NOT** on the pre-approved list)

Competitive Procurement and Private Grants for School Food Programs

The United States Department of Agriculture recently brought to our attention that some school districts may be applying for or participating in grant programs that are aimed at assisting schools with start-up or expansion of the Child Nutrition Programs, specifically the School Breakfast and Summer Food Service Programs. The foundations sponsoring the grants are associated with companies that provide goods and services to the school meals programs. Review of these grant programs revealed that at least some contain a mandatory purchasing component, requiring recipients to purchase and use a vendor's specified product for a stipulated amount of time.

Please remember, all SFAs must comply with the federal procurement requirements set forth in program regulations and require that procurements are conducted in a competitive manner.

Due to the proprietary purchasing requirements imposed by these grant programs, an SFA would be unable to participate in the grant while adhering to all required program regulations, specifically those addressing procurement activities. SFAs that have already received such a grant must take immediate steps to curtail the grant or to ensure that all purchases made as a result of the grant requirements come only from non-program funding sources. The SFA may not go forward with the grant purchasing requirements using nonprofit school food service account funds.

USDA Policies and Resources

- [SP/CACFP/SFSP 02-2010: Procurement Questions](#)
- [USDA Processing Memo FD-40 Value Pass Through Methods](#) 
- [USDA Procurement Regulations](#)
- [SP02-2022 CACFP 03-2022 SFSP 01-2022: Updates to the Federal Micro-Purchase Threshold in 2 CFR 200.320\(a\)\(1\)](#)
- [SP20 CACFP074 SFSP06-2019: Federal Micro-Purchase and Simplified Acquisition Thresholds](#)
- [SP04 SFSP01 CACFP04-2018: Market Basket Analysis Memo](#)
- [Code of Conduct](#) 
- [SP 22-2024 CACFP 08-2024 SFSP 13-2024: Geographic Preference Expansion](#)
- [Large/Formal Purchase Method: For FSMC/Vended Meals](#) 
- [Large/Formal Purchase Method: For Food/Supplies/Equipment/Services](#) 
- [Micro Purchase Method](#) 
- [Procurement Procedure](#) 
- [Purchasing Equipment](#) 
- [Small Purchase Method](#) 
- [Terminologies](#) 

Common Questions and Answers

Question: I heard bidding is no longer required, is that correct?

Answer: No.

In 2022, [Public Act 102-1101](#) was updated. This update to the law allows for the use of the IFB procurement method or the RFP procurement method if certain criteria are met. SFAs must continue to solicit bids or proposals in the purchasing of goods, services and/or food service management. There has been no change to the dollar thresholds that determine whether the purchase/contract can utilize the micro purchase, informal or formal procurement method. There has also been no change to the required 3 step process for the procurement of vended meals and/or Food Service Management Company contracts. It does however allow for the SFA to determine if the IFB or RFP would be the best option for their SFA.

Question: I have heard that we can just pick who to award the contract to now - is that correct?

Answer: No.

- SFAs will need to determine which procurement method will be best for their SFA and complete the procurement process. SFAs must ensure that the award of each contract follows their code of conduct, procurement procedures and make determinations in a transparent & ethical manner. While also ensuring that the SFA is a good steward of federal and state funds. It is important that SFAs should utilize their legal department to ensure compliance and in order to respond to any bid protests that may occur.
 - Full and open competition must be maintained, and the procurement must not restrict or eliminate competition.
 - If choosing the IFB method, the SFA will develop their specifications and bidders that are responsible, responsive and can meet their requirements at the lowest price would be awarded the contract.
 - If choosing to utilize the RFP method, the SFA will develop a scoring matrix that will be used in the review of submitted proposals and price must be a primary factor in the scoring.
-

Question: Do RFPs make meals healthier for our students?

Answer:

- SFAs determine what their meal programs look like. The SFA needs to define the content of their meals in their solicitation. All meals served as part of the federal meal programs must at a minimum meet the federal meal pattern requirements. SFAs may have additional requirements or preferences regarding meal content with both an IFB and an RFP.
 - Both IFBs and RFPs allow for SFAs to define what they want their meals to look like. For Example, if an SFA wants fresh local fruits and vegetables served 3 days per week, that should be listed in their IFB or RFP solicitation. If an SFA wants unprocessed scratch cooked meals, the SFA should list that in their IFB or RFP solicitation.
 - Once the contract is awarded, the SFA are required to manage the contract and ensure their meal program has continued compliance with their contract requirements, regardless of the procurement method used.
-

Question: Are RFPs better for the SFA than IFBs?

Answer:

Neither an RFP or an IFB is "better" than the other. They both have their purpose and **the SFA** needs to consider a variety of factors in order to determine which procurement method would be best for each procurement they conduct. Some of the factors that play into the SFA determining which method is best for each procurement include but are not limited to the SFAs:

- Timeline - how quickly do you need what you are procuring?
- Does the SFA have a clear understanding of the product or service needs or does the SFA want ideas or suggestions?
- Does the SFA possess the technical skills necessary to develop the written evaluation and scoring criteria, complete a review of the responses received in order to evaluate and score the proposals as specified in the solicitation, and negotiate with proposers?
- Do you want a process in which you have requirements that **MUST** be met or do you have a sliding scale for preferences that you would like to have met?
- How much time do you have to manage your contract (after throughout the year)?
- These are just a few of the factors that the SFA should consider when determining which procurement method they should use for each procurement. Keep in mind that the SFA needs to make this decision based on their needs and if the SFA wishes to talk through the options ISBE procurement staff are available to talk through it.

Question: Do I have to formally solicit for perishable food and beverages that totals \$250,000 or less in a fiscal year?

Answer: No.

Since the state regulation (Illinois School Code) exempts purchases of perishable foods and beverages from formal solicitation, the federal threshold takes precedence. If purchases are in excess of \$250,000, they must be formally solicited. If purchases are \$250,000 or less, then an informal procurement must be conducted, and obtain price quotes from a minimum of three potential suppliers. Contracts for purchasing only prepared foods from vendors must adhere to the \$250,000 threshold.

Question: Can SFAs split up large purchases into smaller amounts in order to fall below the small purchase threshold?

Answer: No.

SFAs cannot intentionally split purchases in order to fall below the Federal, State, or local small purchase threshold in an effort to avoid more rigorous procurement practices.

Question: An SFA is able to conduct procurement under the small purchase threshold. Can the SFA procure unprocessed locally grown or locally raised agricultural products directly from a local farmer or local market?

Answer: Yes.

However, the procurement must be conducted in a manner that maximizes full and open competition. According to Federal regulations, the SFA can conduct procurement under the small purchase threshold if the procurement is under \$250,000 in value. The SFA should put the number, quality, and type of goods in writing before contacting any potential offerors. When using the small purchase threshold, quotes must be obtained from an adequate number of sources who are eligible, able, and willing to provide the unprocessed locally grown or locally raised agricultural product. Refer to the section on *Informal Bidding Procedures* above.

Food Distribution Program

USDA Foods

Food Distribution Program - USDA Foods

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Additional Resources

- ISBE Food Distribution Program Website
<https://www.isbe.net/Pages/School-Nutrition-Programs-Food-Distribution.aspx>
- USDA Food Distribution Program Website
<https://www.fns.usda.gov/usda-fis>

Overview

The Illinois State Board of Education administers the United States Department of Agriculture (USDA) Food Distribution Programs for schools in Illinois. Program participants must follow federal regulations at [7 CFR Part 250](#).

Mission

The mission of the Food Distribution Programs is to strengthen the Nation's nutrition safety net by providing food and nutrition assistance to school children and families; and support American agriculture by distributing high quality, 100% American-grown USDA Foods. More specifically, the USDA Foods in schools program supports domestic nutrition programs and American agricultural producers through purchases of 100% American-grown and American-produced foods for use by schools and institutions participating in the National School Lunch Program.

Eligibility

Participants in the National School Lunch Program (NSLP) are eligible to participate in the Food Distribution Program. SFAs shall accept and use USDA Foods, in as large quantities as may be efficiently utilized. USDA Foods are also available to Summer Food Service Program participants that prepare their own meals, receive their meals via an agreement with a school food authority, or have a properly procured contract with the same food service management company from which they received NSLP meals during the prior school year.

Completing the annual School Nutrition Programs application automatically enrolls participants in the Food Distribution Program; however, the participants must place a USDA Foods order in the Illinois Commodity System, to receive food. Please see the Annual Order section for more details on placing an order.

Child and Adult Care Food Program participants receive cash in lieu of commodities. Cash in lieu of commodities reimbursement is added to lunch and supper meal reimbursement rates and provided to CACFP participants with claim reimbursement.

Finally, USDA Foods are made available to disaster relief agencies when the President of the United States declares a disaster, as well as, in other situations of distress. USDA Foods are provided to disaster victims through congregate meal services. Please see the Disasters and Situations of Distress section for more details.

Allocation

Each state receives USDA Foods entitlement based on the total number of eligible lunches claimed in NSLP during a given year, multiplied by the federal assistance rate, which is determined annually by USDA. In turn, each school food authority receives a portion of the state

dollars based on its lunches claimed, which is referred to as the Planned Assistance Level (PAL). A school food authority's PAL is listed on its annual order form in the Illinois Commodity System, to assist school food authorities when placing the annual order.

In addition to PAL USDA Foods, USDA may make special purchases of foods called bonus foods. Bonus foods are not charged against the state's or school's PAL. Most bonus USDA Foods are one-time or limited-purchase items and are allocated to states on a fair-share basis, based on the number of NSLP lunches claimed.

Spending Options

School food authorities (SFAs) have three options for spending Food Distribution Program entitlement money. SFAs can choose any or all options.

1. USDA Foods
2. DOD Fresh
3. Diversion to Processor

USDA Foods

The first option is to order USDA Foods, commonly referred to as commodities or brown box. SFAs may choose to designate a portion or all of their PAL to USDA Foods. SFAs order USDA Foods once a year, using ISBE's web-based [Illinois Commodity System \(ICS\)](#). USDA Foods are generally delivered monthly, from August through April, by Lanter Distributing, a contracted warehouse and delivery company. SFAs are responsible for paying the delivery cost. Please refer to the USDA Foods Delivery section for more delivery information.

USDA offers a variety of USDA Foods based on market availability, cost, and the preferences of recipient agencies. USDA continues to expand the variety of USDA Foods, with more than 200 products available for distribution. They have also reduced the fat, sugar, and salt content in many USDA Foods, in recognition of the *Dietary Guidelines for Americans*. Foods available include high quality 100% American-grown and American-produced vegetables, fruits, dairy, whole grains, lean meats, and other protein options. A [USDA Foods Available List](#) is provided by USDA annually. From the USDA Foods Available List and a review of past orders, ISBE determines which USDA Foods to include on the annual order form. School food authorities then make their selections from the annual order form.

Bonus USDA Foods become available at times, through USDA's price support and surplus removal programs. ISBE notifies participants when bonus USDA Foods become available.

DOD Fresh

The second spending option is the Department of Defense (DOD) Fresh fruits and vegetables program. SFAs may choose to designate a portion or all of their PAL to DOD Fresh. SFAs must use the DOD web-based [Fresh Fruits and Vegetables Order Receipt System \(FFAVORS\)](#) to place orders and receipt orders. FFAVORS also maintains the SFA's fund balance. For delivery service in Illinois, DOD contracts with Central Illinois Produce, and Central Illinois Produce subcontracts with various regional companies. DOD Fresh is generally delivered weekly, throughout the school year. There is a \$150 minimum order per delivery, and no separate delivery cost to the SFA.

Please refer to the [DOD FFAVORS Ordering Manual](#) for step-by-step instructions on viewing the catalog of offerings, placing orders, receipting orders, and running reports. A login and password are required for FFAVORS. Please contact ISBE to set-up a user account.

Diversion to Processor

The third option SFAs have for spending Food Distribution Program entitlement money is diversion to processor. SFAs may choose to divert raw USDA Foods to a manufacturing company, for further processing. The processor will convert the USDA Foods into more convenient, ready-to-use end products. SFAs may choose to designate a portion or all of their PAL for diversion to processor.

SFAs indicate their choice to divert USDA Foods once a year, during the annual order period, in ISBE's web-based Illinois Commodity System (ICS). SFAs choosing to divert USDA Foods for processing must select the processor(s), the USDA Food(s), and the number of pounds to be diverted, on the annual order form in ICS. Please refer to the [Processing Calculator](#) for assistance in calculating the number of pounds to divert.

SFAs interested in diverting USDA Foods for processing are encouraged to attend an ISBE sponsored USDA Foods Show, generally held between September and November each year, prior to the annual order period. In addition to sampling various end products, SFAs have the opportunity to meet company representatives and discuss the processing option.

Before diverting USDA Foods, it is important for SFAs to communicate with their distributor, to ensure that the distributor carries the desired end products. If the distributor does not and will not carry the desired end products, and the SFA cannot receive deliveries directly from processors, then SFAs should not divert pounds for those products.

For SFAs that have diverted to processors previously, it is important to check the pound balances in [K12](#) and/or [ProcessorLink](#). K12 and ProcessorLink are data systems that track the diversion and usage of USDA Foods diverted to processors. The SFA is responsible for tracking the drawdown

of pounds and verifying the receipt of processed end products in K12 and ProcessorLink each month.

Once USDA Foods have been diverted to a processor, SFAs place orders through their distributor and/or directly with the processor, as needed. Deliveries and delivery costs are based on the terms of the distributor and/or processor contracts. The value of the USDA Foods used in the end product is provided to the SFA using a value pass through system. The four value pass through systems include:

- Direct Discount – The SFA purchases the end product from the processor or distributor at an initial discounted price. The discounted price is the commercial price less the value of USDA Foods.
- Indirect Discount (Net-off Invoice) – The processor works with the distributor to deliver the end product to the SFA and to deduct the value of the USDA Foods used to produce the end product, from the commercial price of the product. The price reduction is reflected on the SFA’s invoice from the distributor. The processor then compensates the distributor for the discount provided to the SFA.
- Refund or Rebate – The processor works with the distributor to deliver the end product to the SFA; however, the distributor is not involved in passing the value of the USDA Foods onto the SFA. The SFA must work with the processor directly to receive a refund/rebate, after paying full price to the distributor for the product. The refund/rebate is for the value of the USDA Foods used to produce the end product. The refund/rebate must be requested by the SFA in writing and must be paid by the processor within 30 days of receiving the request.
- Fee for Service – The processor sells end products to a distributor or SFA at a fee-for-service, which includes all costs to produce the end products not including the value of USDA Foods. There are three types of fee-for-service:
 1. Direct shipment and invoicing from the processor to the SFA
 2. Fee-for-service through a distributor, where the processor ships multiple pallets of product to a distributor with a breakout of who owns what products
 3. Modified fee-for-service, where the SFA has an authorized agency bill them for the total case price

Annual Order

In order to receive USDA Foods, school food authorities (SFAs) must place an annual order in the [Illinois Commodity System \(ICS\)](#). The annual order is generally placed in January, for the following school year, July 1 to June 30. To place an order, please follow the steps in the [ICS Instructions](#).

ICS requires a login and password. To register, please complete and submit the [ICS New User Registration Form](#). SFAs must have one authorized user, and a back-up user is recommended. SFAs may allow user access for food service management companies and vended meal companies, however, SFAs are responsible for the operation of the Food Distribution Program.

After SFAs place orders with ISBE, ISBE places orders with USDA. USDA specifies delivery periods for certain USDA Foods. In an effort to help SFAs plan menus and storage needs, ISBE creates an [Anticipated USDA Foods Chart](#), which lists the month(s) each USDA Food is planned to be delivered to schools.

USDA Foods orders can be adjusted by the SFA throughout the school year. ISBE will do its best to accommodate changes, but there is no guarantee. Accommodations are dependent upon order deadlines, inventory, and budget considerations.

DOD allotment can be adjusted by the SFA for a period of time after the annual order period deadline. Once the DOD screen in ICS becomes unchangeable to the SFA, the SFA may contact ISBE if an adjustment is needed. ISBE will make adjustments if possible, based upon budget and contract considerations.

Diversions to processors cannot be adjusted by the SFA after the annual order period deadline.

USDA Foods Delivery

ISBE contracts with Lanter Distributing, LLC for warehouse and delivery services of USDA Foods. Each month, from August through April, ISBE allocates USDA Foods to SFAs, based on the SFA's annual order form and receipt of USDA Foods from USDA. Lanter delivers the allocated USDA Foods to the delivery sites specified by SFAs in the Illinois Commodity System (ICS).

The following terms apply to deliveries of USDA Foods:

Deliveries will be made between 7:00 AM and 2:30 PM (CST), Monday through Friday.

Designated delivery sites may be schools, school storage facilities, or – unless disapproved by ISBE – commercial warehouse facilities of the SFA's choice.

SFAs are responsible for paying the delivery charges. The cost of delivery for school year 2023-2024 is \$6.70 per case. The charge may change from year to year. There is a 5-case minimum delivery requirement, per delivery site, per month.

Lanter must schedule deliveries to each SFA that take into consideration the SFA's labor needs for the delivery of USDA Foods.

At the option of the SFA, weekly deliveries are available to any site receiving more than \$40,000 a year in USDA Foods.

Deliveries will be unloaded from the truck trailer and placed in the designated location outside the SFA's delivery site. The delivery site does not need a delivery dock.

Custom deliveries may be prearranged or requested at the time of delivery by the SFA. Custom delivery is defined as placing the USDA Foods in an indoor central holding area at the delivery site, as determined by the SFA. SFAs will incur a custom delivery charge. The charge for school year 2023-2024 is \$0.75 per case. The charge may change from year to year.

Lanter shall provide all equipment necessary to deliver foods.

Lanter shall provide SFAs with 72-hour advance notice of a future delivery. At a minimum, the notice shall include the delivery date and the type and quantity of food being delivered. If the SFA does not receive a 72-hour prior notification of a delivery date, Lanter must provide a custom delivery at no charge to the SFA.

After delivering food to each SFA at each delivery site, Lanter must obtain a signature from a designated representative of the SFA on the delivery receipt of the Bill of Lading/Freight Waybill.

Lanter must transport food to the SFAs in such a manner as to ensure safety, wholesomeness, and sanitary conditions. In addition, Lanter must maintain the appropriate ventilation, security, and temperature levels for the types of food being transported. Lanter shall ensure that frozen foods stay frozen until delivered to the SFA.

SFAs must verify the accuracy of quantities and code numbers for each item and the condition of the food.

- Count the items received
- Check all items for damage
- Check temperatures
- Compare the delivery request to what was actually delivered
- Reject damaged items
- Note discrepancies on the delivery receipt – Identify the quantity and whether the item(s) were missing or returned due to damage. Shortages and damages shall be noted on the delivery receipt by the SFA and initialed by both the SFA and the Lanter truck driver. Lanter shall not be required to issue a credit for errors not detected at the time of delivery, except for hidden damage.
- Sign the delivery receipt
- Sign the custom delivery (if applicable)
- Mark *yes* or *no* regarding delivery satisfaction
- Record the date received on each case/bag delivered

Lanter must factor in ample time to each delivery to allow truck drivers to be physically present for the verification of quantity and code numbers of each item and condition of the food.

Lanter and the SFA shall understand and agree that the title of the food shall pass from ISBE to the SFA when the SFA signs the delivery receipt.

The following shall apply in instances where a scheduled delivery is not made.

- **Missed Delivery:** If Lanter is unable to meet the preassigned delivery date, then the SFA must be notified prior to the scheduled delivery, and Lanter must provide a custom delivery at no charge. The alternate delivery date must be scheduled within the delivery month unless an alternate delivery date is approved by ISBE.
- **Emergency Day:** If unforeseen circumstances cause the SFA to take an emergency day and subsequently cause a non-delivery, then Lanter is not obligated to provide a custom delivery to the SFA on the reschedule delivery date. An emergency day is defined as an unscheduled official day of school closing entered on the official ISBE school calendar. Additionally, Lanter may charge a back-haul fee equal to no more than half of the regular delivery fee for having to return the USDA Foods from the truck to its warehouse.
- **Refused Delivery:** If all or part of a delivery is refused by the SFA for reasons other than damaged USDA Foods or the scenarios noted above, Lanter may charge a back-haul fee equal to no more than half the regular delivery fee. A back-haul fee may be charged in addition to the delivery fee.

Storage

7 CFR 250.14 requires SFAs to provide facilities for the storage and control of USDA Foods that protect against theft, spoilage, damage, or other loss. The storage facilities must maintain USDA Foods in sanitary conditions, at the proper temperature and humidity, and with adequate air circulation. SFAs must ensure that storage facilities comply with all Federal, State, or local requirements relative to food safety and health and procedures for responding to a food recall, as applicable, and obtain all required health inspections.

USDA Foods may be stored at commercial storage facilities. USDA Foods may not be stored in private homes. SFAs using a commercial storage facility must do so in compliance with procurement requirements, and SFAs must ensure that commercial storage facilities comply with all Food Distribution Program requirements.

All storage must meet the USDA required [Hazard Analysis and Critical Control Point \(HACCP\)](#) practices. Infestation, spoilage, contamination, damage, and theft of USDA Foods usually occur because of malfunctioning refrigeration equipment or improper storage practices. Below are desirable practices to follow:

Storage Temperatures

- Dry – 50-70°F
- Refrigerated – 36-40°F
- Frozen – 0°F or below

Refrigerator/Freezer Storage

- Store foods in refrigerators and freezers operating properly and in good repair.
- Clean and dry refrigerators and freezers thoroughly before placing foods in storage.
- Place foods on pallets or shelves, with one to two inches of space left between the walls and the food containers, to ensure proper air circulation.
- Stack foods properly to prevent damage.
- Take and record daily temperatures in the refrigerators and freezers. Recording thermometers should be on the outside of the refrigerators and freezers for easy viewing of the temperatures without opening the doors.
- Check thermometers and refrigeration equipment periodically to ensure proper operation. Repair malfunctioning equipment immediately. This is especially important over summer break.
- Equip refrigerators and freezers with an alarm system to detect low/high temperatures or power failures. Check refrigerators and freezers immediately after a power failure to ensure they are operating properly, and stored foods are still in good condition.
- Lock all refrigerators and freezers. Only authorized personnel should have access.

Dry Storage

- Maintain an insect and rodent control program.
- Ensure walls, floors, and ceilings are smooth, impervious to moisture, easy to wash, and vermin-proof.
- Store containers of food a minimum of six inches off the floor to protect the food from contamination and permit easy cleaning. Containers may be stored on dollies, racks, or pallets that are easily moveable.
- Allow one to two inches of space between the walls and the food containers, to ensure proper air circulation.
- Cross-stack boxed items on pallets to provide for circulation and to prevent toppling. Bagged items and those requiring fumigation and insect control should not be stored in large masses in corners of the storeroom or directly against the wall.
- Take and record daily temperatures. Thermometers should be conveniently located.
- Label foods removed from their original containers and stored in bulk containers with the common name for contents.

- Store cleaning and sanitizing supplies in a separate area from food.
- Store chemicals used in pest control separately from food supplies and cleaning supplies.
- Ensure food is not stored under exposed or unprotected sewer lines or water lines.
- Lock storerooms. Only authorized personnel should have access.

Inventory

SFAs may utilize single inventory management, meaning that USDA Foods and foods from other sources may be commingled in storage, and the SFA may maintain a single inventory record of such commingled foods. Single inventory management applies to foods stored on-site at the SFA or to foods stored at a commercial storage facility. USDA Foods are subject to the same safeguards and effective management practices as other foods.

Excess Inventory at Processors

7 CFR 250.35(d) requires ISBE to monitor processor inventories to ensure that the quantity of donated foods for which the processor is accountable is the lowest cost-efficient level but may not exceed a six-month supply based on the processor's average monthly usage. To ensure this requirement is met, ISBE enforces the following procedures:

- USDA Foods diverted to processors must be used by June 30 of the year in which the pounds were diverted. For example, if pounds were diverted for school year 2024 (July 1, 2023 to June 30, 2024), the pounds must be used by June 30, 2024.
- Pounds not used by June 30 will be removed from a School Food Authority's (SFA) account and transferred to the State of Illinois account.
- Usage is monitored throughout the school year. If a SFA's account exceeds a six-month supply based on the SFA's average monthly usage, pounds will be transferred to the State of Illinois account.
- Inventory in the State of Illinois account will be available on a first come first served basis.
- SFAs may contact processors/brokers on an individual basis to request pounds from the State of Illinois account. SFAs requesting pounds should be familiar with USDA Foods processing procedures and end product distribution.
- SFAs losing pounds will not receive a credit, and SFAs gaining the pounds will not be charged.

SFA Transfers of USDA Foods

SFAs may transfer USDA Foods to another site under the same SFA, to another SFA, or to a charitable organization without approval from ISBE or USDA. The SFA must maintain inventory records documenting the transfer.

Out-of-Condition USDA Foods

SFAs must comply with State or local requirements in determining the safety of all foods, including USDA Foods, and in their destruction or other disposition. SFAs are not required to report such actions to ISBE.

Other Allowable Uses of USDA Foods

SFAs must use USDA Foods, as much as is practical, in the lunches provided through NSLP. However, SFAs may also use USDA Foods in other activities of the nonprofit food service. Revenues received from such activities must accrue to the nonprofit food service account. Some examples of such activities in which USDA Foods may be used include:

- School breakfasts or other meals served in child nutrition programs
- A la carte foods sold to school children
- Meals served to adults directly involved in the operation and administration of the nonprofit food service and to other school staff
- Training in nutrition, health, food service, or general home economics instruction for students

Food Recalls

Food recall means an action to remove food products from commerce when there is reason to believe the products may be unsafe, adulterated, or mislabeled. The action is taken to protect the public from products that may cause health problems or possible death. SFAs must follow all applicable Federal, State, or local requirements for USDA Foods subject to food recall. ISBE will notify SFAs of food recalls deemed to affect Food Distribution Program participants. There are three USDA recall classifications:

Class I – This is a health hazard situation where there is a reasonable probability that the use of the product will cause serious, adverse health consequences or death.

Class II – This is a health hazard situation where there is a remote probability of adverse health consequences from the use of the product.

Class III – This is a situation where the use of the product will not cause adverse health consequences.

Reviews

ISBE conducts School Nutrition Program administrative reviews in accordance with 7 CFR 210.18. Administrative reviews include a review of the Food Distribution Program. Per 7 CFR 210.14(d), SFAs shall accept and use, in as large quantities as may be efficiently utilized in its nonprofit school food service, such foods as may be offered as a donation by USDA. SFA's policies, procedures, and records must account for the receipt, full value, proper storage and use of USDA Foods. Furthermore, in regard to food service management companies (FSMC), ISBE ensures that all USDA Foods received by the SFA and made available to the FSMC accrue only to the benefit of the SFA's nonprofit school food service and are fully utilized.

Complaints

Please notify ISBE of concerns regarding USDA Foods by completing the [USDA Foods Complaint Form](#). Use this form for concerns with USDA Food quality, appearance, packaging, etc. Please complete as much information as possible on the form and include pictures. Do not discard any USDA Food that is the subject of a complaint prior to guidance and authorization from USDA.

Please notify ISBE of concerns regarding the delivery of USDA Foods by completing the [USDA Foods Delivery Complaint Form](#). Use this form for concerns regarding delivery issues, such as late deliveries, cancelled deliveries, damaged cases upon delivery, etc.

ISBE provides USDA Foods complaint information to USDA, and other applicable agencies, for further investigation. ISBE provides delivery complaint information to Lanter Distributing, our contracted warehouse and delivery provider, and works with them to ensure the terms of the contract are fulfilled.

Disasters and Situations of Distress

ISBE and SFAs may provide USDA Foods from current inventories to a disaster organization for use in providing congregate meals to persons in need of food assistance because of a Presidentially declared disaster or emergency. USDA will replace inventories used.

ISBE and SFAs may provide USDA Foods from current inventories for use in providing congregate meals to persons in need of food assistance because of a situation of distress, which means a natural catastrophe or other event that does not meet the definition of disaster. Examples include hurricanes, floods, snowstorms, or explosions. USDA will replace inventories used in a situation of distress only to the extent that funds are available.

Total Value of USDA Foods Received

A [report](#) of the total value of USDA Foods received by each SFA is provided annually, by July 31, for the previous school year. The report includes an alphabetical listing of all SFAs that participated in the Food Distribution Program and summarizes the value of all USDA Foods received for the year.

Record Retention

All records pertaining to the Food Distribution Program must be retained for three years plus the current year. However, records pertaining to claims or audits that remain unresolved in this period of time must be retained until such actions have been resolved.

Community Eligibility Provision (CEP) and Provisions 1, 2, and 3

Community Eligibility Provision (CEP) and Provisions 1, 2 & 3

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Additional Resources

- ISBE’s Community Eligibility Provision Website – www.isbe.net/cep
- USDA’s Community Eligibility Provision Planning and Implementation Guide - <https://www.isbe.net/Documents/cep-plan-implement-guidance1601.pdf>
- Household and Income Form (ISBE 69-72)
 - English
https://www.isbe.net/Documents/69-72_hshld_income.pdf#search=69-72
 - Spanish
<https://www.isbe.net/Documents/69-72-hshld-income-sp.pdf#search=69-72>

Community Eligibility Provision (CEP)

Overview of CEP

The Community Eligibility Provision (CEP) is an optional alternative to using household eligibility applications in high poverty schools. To be eligible for CEP, schools must:

- Meet a minimum level (25%) of their students as *Identified Students* as of April 1 in the year prior to implementing CEP.
 - *Identified Students* are those students that are directly certified for free meal benefits based on SNAP/TANF/Medicaid/Foster, students that were extended benefits based on direct certification status of SNAP/TANF/Medicaid household member, and students that are certified for free meals based on homeless, migrant, runaway or Head Start without the use of a household eligibility application and not subject to verification. (Directly certified students based on Medicaid for reduced price benefits do NOT count as Identified students for the CEP application.)
- Agree to offer reimbursable lunch **AND** reimbursable breakfast at no cost to ALL enrolled students every school day.
- Agree to cover any costs of providing reimbursable meals (breakfast and lunch) above the amounts provided in federal assistance, with non-federal funds.

Schools that choose to participate in CEP must **NOT**:

- Collect household eligibility applications (HEA) for school meal benefits from households during the period in which they are participating in CEP.
- Be a Residential Child Care Institution (RCCI).

Reimbursement for CEP schools is based on a claiming percentage that is derived from the percentage of *Identified Students* as of April 1 the year prior to implementing CEP. The claiming percentage established for the first year of CEP is guaranteed for a period of four consecutive school years, unless the district withdraws and reapplies for CEP with updated enrollment and identified student numbers between April 1 and June 30th or due to compliance issues during an Administrative Review. If the district reapplies for CEP, then a new 4-year cycle begins.

Identified Students

To be eligible for CEP an LEA, school, or group of schools, must have a minimum *Identified Student* percentage of 25% as of April 1 the year prior to implementing CEP. *Identified Students* include the following:

- Directly certified for free meals based on their participation in the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF),

income eligible free Medicaid and the extension of benefits to students within the same household. (Electronic Direct Certification System in Illinois)

- Directly certified foster child (Not through use of a household application). Directly certified foster children are NOT extended to other household students.
- Homeless (certified by homeless coordinator listing)
- Runaway (certified by runaway coordinator listing)
- Migrant youth (certified by the migrant coordinator listing)
- Head Start (certified by the Head Start coordinator listing)

Identified Students do **NOT** include the following:

- Directly Certified students based on Reduced Price Medicaid benefits
- SNAP/TANF number on an HEA application
- Foster child marked on a HEA
- Submission of a HEA based on income

To apply for CEP, a school must use the number of *Identified Students* as of April 1. LEAs can maximize *Identified Student* numbers by ensuring the annual AND monthly direct certification files are used and that students are provided an extension of benefits when appropriate.

An extension of benefits occurs when any member of a household is found in the Electronic Direct Certification system based on SNAP, TANF, or income eligible free Medicaid. Those free benefits can be extended to all other members in that household, therefore all students in that household would be directly certified for free meals and would count as *Identified Students* in schools applying to participate in CEP. Ensure that you maintain documentation of all *Identified Students* including all [extensions of benefits](#).

Claiming Meals in CEP

Schools that apply to participate in CEP will be provided an approved free and paid claiming percentage based on the number of *Identified Students*, multiplied by the USDA established *Claiming Factor*. The USDA established *Claiming Factor* can change annually, but a school is locked into the factor established in year one of CEP implementation for a 4-year cycle.

CEP schools will only need to track the total number of meals served each school day. CEP schools will no longer need to keep track of meals served by free, reduced, and paid categories, as these categories are not established for meal benefits. This same process is done for breakfast and lunch meals served each day. The total number of meals are reported each day and federal reimbursement will be provided based on the approved claiming percentage of FREE and PAID meals. Under CEP, there are no REDUCED-PRICED meals. CEP approved schools need to complete a [CEP meal count edit](#) prior to the submission of the monthly claim for reimbursement.

EXAMPLE of determining the approved claiming percentage:

- Number of *Identified Students* as of April 1: 241
- Enrollment as of April 1: 407

Step One:

Divide the number of identified students by enrollment.

$$241/407 = 0.5921376$$

Step Two:

Take that figure and multiple by the current approved USDA Claiming Factor (SY2023-2024, 1.6)

$$0.5921376 \times 1.6 = .94742016$$

Step Three:

This figure is the approved claiming percentages for FREE meals. If greater than 1.0, this figure is capped at 100%.

$$94.74\% \text{ of all meals served are reimbursed at the FREE rate}$$

Step Four:

If this number in step three is less than 1.0, take that number and subtract from 1.0 to determine the PAID claiming percentage.

$$1.0 - .9474 = .0526$$

$$5.26\% \text{ of all meals served are reimbursed at the PAID rate}$$

When completing the claim for reimbursement for CEP in the WINS system, only the total number of breakfasts and lunches served each day is reported. The system will apply the approved claiming percentage to that total number of meals and automatically determine how many FREE and PAID meals will be reimbursed each day.

If approved in CEP, complete CEP approval data is in WINS on the *Main Dashboard, Sponsor Tasks, CEP Group Information*. This area will also maintain inactive, withdrawn and pending CEP data as well.

2525-13041201017-A24

Approved

Student Counts	Rate Percent	Group Info
Identified Students: 572	CEP Eligibility: 51.21 %	Number of Sites: 1
Enrollment: 1117	Free Claiming %: 81.93 %	Begin Date: 7/1/2023
Modified Students: 0	Paid Claiming %: 18.07 %	End Date: 6/30/2027

Rate Info

Average Breakfast Reimbursement: **\$2.34**

Average Lunch Reimbursement: **\$3.67**

Withdraw
Delete

SiteName	SiteNumber	Identified Students	Enrollment	Identified Students %	GroupName	Status
Mount Vernon High School	13064	572	1117	51.21	2525-13041201017-A24	Approved

The *CEP Approval Letter* may be found in the attachment (paperclip icon) area in WINS. Each year of approval, a notification is generated by WINS. The official approval letter is generated in the program year in which the CEP application was completed. You may need to toggle back to a prior program year to find the original approval letter, if needed for review or audit.

Determining How to Setup CEP Participation

Based on individual school, group of schools, or entire LEA

LEAs interested in CEP must determine how to best operate CEP for an individual school, a group of schools or an entire LEA given the expected level of Federal reimbursement and other available non-Federal funding sources. The 25 percent ISP threshold for participation may be determined based on an individual school, a group of schools, or an entire LEA. This allows for some participating schools to be below the 25 percent threshold if the aggregate ISP of the group of schools or entire LEA meets the threshold. Adopting CEP district-wide permits an LEA to reap the benefits of CEP at all schools. In other situations, electing CEP for an individual school or group of schools within the LEA may be a financially viable option, and allows an LEA to reap CEP's benefits at one or some schools. Partial election also gives LEAs an opportunity to become familiar with CEP and how it works, before expanding the provision to a larger number of schools.

CEP Evaluation Worksheet

To assist LEAs in determining if CEP is a financially feasible option for schools or districts then using the traditional meal counting and claiming procedures, ISBE has developed a [CEP evaluation worksheet](#). The worksheet compares meal reimbursement based on traditional meal counting and claiming as well as CEP. The worksheet does not take factor in other costs such as the cost of the annual eligibility process (printing, mailing, and processing HEA and direct certification) as well as the completion of the verification process.

In order to complete the worksheet, the following information will be needed:

- Determine if the worksheet will be completed by individual school, group of schools or entire LEA.
- Claim data (may be for any period of time):
 - Breakfast – FREE, REDUCED-PRICE, PAID meals
 - Lunch – FREE, REDUCED-PRICE, PAID meals
- Student prices:
 - Breakfast – REDUCED-PRICE and PAID
 - Lunch – REDUCED-PRICE and PAID
- Enrollment (individual school, group of schools or entire LEA)
- *Identified Students* (individual school, group of schools or entire LEA)
- Rate of Reimbursement (NSLP and SBP) This is found in the paper clip icon, on the NSL approval letter, annually generated by WINS.

Remember if sites are being grouped together or the whole district, combine claim data, enrollment, and *Identified Student* numbers.

LEAs enter data in the yellow highlighted boxes of the worksheet, and the results will be calculated and auto filled in at the bottom of the worksheet. There are four worksheet options to choose from based on approved claiming rates for both breakfast (severe need or non-severe need) and lunch (60% or greater or less than 60%). CEP evaluation worksheets are updated annually to reflect the current rates of reimbursement.

- 1) **NSLP 60% rate and non-severe need breakfast** – For a school/group/LEA that receives the higher reimbursement rate for the entire district being greater than 60% free and reduced eligible for lunch and is non-severe need breakfast reimbursement.
- 2) **NSLP 60% rate and severe need breakfast** – For a school/group/LEA that receives the higher reimbursement rate for the entire district being greater than 60% free and reduced eligible for lunch and severe need breakfast reimbursement.
- 3) **NSLP less than 60% rate and non-severe need breakfast** – For a school/group/LEA that receives the less than 60% free and reduced eligible lunch reimbursement and non-severe need breakfast reimbursement.

- 4) **NSLP less than 60% rate and severe need breakfast** – For a school/group/LEA that does not receive the less than 60% free and reduced eligible lunch reimbursement and ever need breakfast reimbursement.

Evaluation Worksheets 

- **School Year 2023-24 CEP Evaluation Worksheets (Based on SY 2023-24 Rates of Reimbursements)**
In order to determine which worksheet to use, the 60% rate refers to the district's National School Lunch Program rate of reimbursement. Those districts claiming 60% or greater F/R lunches two years prior receive the 60% or greater rate of reimbursement.

The Severe Need Breakfast, is higher rate of reimbursement provided to sites that claimed 40% or greater of their lunches as F/R two years prior. This information can be found on your most recent Approval Letter available in WINS under the attachment link (paper clip icon).
 - [NSLP 60% rate and Non Severe Need Breakfast](#) 
 - [NSLP 60% rate and Severe Need Breakfast](#) 
 - [NSLP less than 60% rate and Non Severe Need Breakfast](#) 
 - [NSLP less than 60% rate and Severe Need Breakfast](#) 

Impact on Other Programs

Participation in CEP may impact other areas of the LEA, areas outside of the meal programs, therefore, school staff are encouraged to involve administrators and business managers in the initial dialogue about options to elect CEP. Schools that elect CEP no longer collect eligibility data by individual student for the meal programs. Public schools and many nonpublic schools may still need to collect socioeconomic data for individual students. Such data may be used for a variety of grants, programs as well as the Student Information System for public schools.

To assist schools in collection of individual student socioeconomic data that may be needed, a sample form is available that is not tied to the School Nutrition Programs but will assist schools in gathering individual student socioeconomic data. The [Household and Income Form \(69-72\)](#) is housed on the Student Information System (SIS) webpage under Demographics/Enrollment.

All schools electing CEP should review all programs that could be impacted by their participation in CEP. Below is guidance regarding a few programs that have specific guidance regarding CEP implementation.

Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA)

The United States Department of Education guidance related to CEP and Title I, Part A (Title I) of the Elementary and Secondary Education Act of 1965, as amended (ESEA) is available at <https://www.isbe.net/Documents/usde-guidance-cep.pdf>. School staff are encouraged to carefully review this guidance and consult a Title I consultant with specific questions. Contact

information for the Title I consultants is available online at https://www.isbe.net/Documents/pc_reg_asmt.pdf or at 217-782-3950.

Universal Service Program for Schools and Libraries (E-Rate)

The Federal Communications Commission has issued guidance related to E-rates and CEP participating schools and this guidance is available online at <https://www.isbe.net/Documents/usac-erate-ltr.pdf>. For questions specific to E-rate, please contact the ISBE State Coordinator for E-rate at 217-782-4322.

Fee-Waivers

Under Illinois law, school districts are required to waive charges for textbooks and other fees for children whose families are unable to afford them, including children eligible for the federal free lunch and breakfast program, and for any other extenuating circumstances for which the school board will waive fees as communicated in its adopted policy (e.g., reduced-price lunch or medical emergencies). [105 ILCS 5/10-20.13 and 34-21.6] More information about options for districts are outlined online at <https://www.isbe.net/Pages/School-Fee-Waivers.aspx>.

CEP participating schools will NOT have eligibility status by individual student. Schools in CEP must choose to

- Waive all fees; OR
- Collect socioeconomic data to determine fee waivers from households in another manner.

ISBE has a sample Household and Income Form (ISBE 69-72) that may be used by districts for this purpose.

- English - https://www.isbe.net/Documents/69-72_hshld_income.pdf#search=69-72
- Spanish - <https://www.isbe.net/Documents/69-72-hshld-income-sp.pdf#search=69-72>

Important Dates Related to CEP

- April 1: Date in which the Identified Students and Enrollment number is used to apply for CEP for the subsequent school year
- April 1 – June 30: CEP Application Time
- June 30: Deadline to apply for CEP for subsequent school year
- June 30: Deadline to withdraw from CEP for subsequent school year

QUICK REFERENCE GUIDE

CEP Evaluation & Application Module

The Community Eligibility Provision process is now in ISBE's Web-Based Illinois Nutrition System (WINS). School Nutrition Programs sponsors can use the Community Eligibility Provision Evaluation (CEP) and Application Module to evaluate if CEP will work for them. After uploading an enrollment file, districts will be able to make adjustments by modifying students and grouping sites. After any necessary modified student approvals by ISBE, sponsors can then submit their CEP application.

Accessing the Module

- Log into WINS through IWAS at www.isbe.net, under System Quick Links at the top of the screen.
- Select "Is Community Eligibility Provision (CEP) for you?" under the Sponsor Tasks tab.

Uploading an Enrollment File

- Create a complete list of your enrolled students in the template file format provided. Only CSV file extension is supported.
- Select Choose File and highlight your .csv file name, and then select Upload.
- After uploading your file, a red banner will identify errors in your enrollment file that need to be fixed in order to continue.
- A green banner will appear if the file is successfully uploaded. Select Continue to populate the results.

Submit the CEP Application

- You must have the authorized representative's permission to submit on behalf of the sponsor and agree to all the requirements of CEP.
- After careful review, submit the CEP application.

Grouping Sites

- WINS sites may be grouped to maximize claiming percentages. CEP would only be at these sites.
- There is a check box to group all of your sites (or if you are a single site district).
- If your site group selections meet the 25% identified student threshold, it will appear in green. If below 25%, a red banner appears with additional guidance.

Maximize Identified Students

- The students appearing on shaded green are enrolled and identified students.
- Students listed on shaded gray are unmatched but can be modified, such as those Direct Certified by Extension of Benefits.
- Modified students must be submitted with documentation to ISBE for approval.

Review and Evaluate Results

- After submitting an error-free enrollment file, the results of the matching process will display. This includes total enrollment, total identified students, and identified student percentage both with and without the USDA approved factor.
- If the numbers qualify and are satisfactory, sponsors can submit the CEP application, or they can edit individual students as identified and group WINS sites to maximize claiming percentages before submitting.

Additional USDA Allowed Provisions (Provision 1, 2, and 3)

In addition to the recently allowed CEP, USDA allows additional provisions to reduce paperwork for high need sponsors. Congress enacted three special assistance alternatives, more commonly known as "Provisions" for the National School Lunch and School Breakfast Programs that require approval prior to implementation by ISBE, Nutrition Division.

Provision 1

This Provision reduces application burdens by allowing free eligibility to be certified for a 2-year period. In schools where at least 80 percent of the children enrolled are eligible for free or reduced meals, annual notification of program availability and certification of children eligible for **free** meals may be reduced to once every 2 consecutive school years. All other households must be provided a meal application and are allowed to apply for meal benefits each school year. There is no requirement to serve meals at no charge to all students. Schools must continue to record daily meal counts of the number of meals served to children by type as the basis of calculating reimbursement claims.

Provision 2

This Provision reduces application burden 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 (base year plus three non-base years). It can be used for breakfast and/or lunch. During the base year, the school makes eligibility determinations and takes meal counts by type. During the next three years, the school makes no new eligibility determinations and only counts the total number of reimbursable meals served. 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. Schools participating in this alternative must pay the difference between the 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. At the end of the 4 years, a 4-year extension may be approved if the income of the school's population remains stable or declines.

Provision 3

This Provision reduces application burdens and meal counting and claiming procedures. It allows schools to receive the same level of Federal reimbursement 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 reimbursement and commodity assistance paid to them 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 reimbursement

and commodity assistance is adjusted to reflect changes in enrollment and inflation. The base year is not included as part of the 4 years. Schools participating in this alternative must pay the difference between the 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. At the end of each 4-year period, Nutrition Services may approve a 4-year extension if the income level of the school's population remains stable or declines.

Residential Child Care Institution (RCCI)

Residential Child Care Institutions (RCCI)

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Additional Resources

- Sample Eligibility Roster
https://www.isbe.net/Documents/67-33_documentation.pdf
- Administrative Handbook:
<https://www.isbe.net/Pages/SchoolNutritionAdminHandbook.aspx>
- On-Site Review Form
https://www.isbe.net/Documents/67-35_onsite_review.pdf
- Meal Participation Record – Last page of this section of the handbook

Residential Child Care Institution (RCCI)

This guidance will cover information related specifically to Residential Child Care Institutions (RCCI's) which either currently participate in or would like to participate in the United States Department of Agriculture's School Nutrition Programs.

This guidance is a supplement to the Administrative Handbook and is not inclusive of all program requirements. For additional requirements of the School Nutrition Programs, please review the complete [Administrative Handbook](#).

General Program Requirements

An RCCI can participate in the School Nutrition Programs provided that the institution:

1. Is public or nonprofit private;
2. Operates principally for the care of children;
3. Is a residential facility;
4. If private, is "tax exempt" under Section 501(c)(3) of the Internal Revenue Code of 1986;
5. If private, is licensed by the state to provide residential child care;
6. Serves those that are age 21 and under

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

Institutions qualifying as an RCCI eligible to participate in School Nutrition Programs include, but are not limited to:

- Homes for the mentally or physically challenged, emotionally disturbed or unmarried mothers and their infants;
- Group homes;
- Halfway houses;
- Orphanages;
- Temporary shelters for abused and/or runaway children;
- Long-term care facilities for chronically ill children;
- Juvenile detention centers.

The School Nutrition Programs in which an RCCI is eligible to participate include:

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Special Milk Program (SMP) (only for children that do not have access to the NSLP)
- And/or the After-School Snack Program (if the RCCI is offering an educational enrichment activity after the school day)

Boarding schools are not considered to be RCCIs.

Annual Application

RCCIs must enter into a written agreement with the State Agency (SA); this agreement sets forth the conditions for operating the program(s). The annual application, which includes both the Agreement and the Policy Statement, are required each year to be eligible to participate.

Certification of Eligibility for Meal Benefits

Once the eligibility of the RCCI to participate has been established, it is necessary to establish the eligibility of the children participating at the RCCI. RCCI's must maintain the names, ages (must be under 21 years of age) and entry and departure dates of all participating children in the School Nutrition Programs.

There is a common misunderstanding regarding the eligibility for FREE meals/milk in RCCIs. Children residing in RCCIs are not automatically eligible for FREE meals. A determination of FREE, REDUCED, or PAID **must** be made. Please see the instructions below for Institutionalized Children (those residing in an RCCI) and for Day Students for the specifics on determining the child's eligibility for FREE, REDUCED, or PAID meals.

RCCIs participating only in the Special Milk Program (SMP) and receiving only the paid rate are not required to obtain eligibility documentation for participating children. This only applies to the SMP, not any other School Nutrition Programs.

Some RCCIs may have both residential children and day students; requirements for certification are different for each type of student. These are described below.

Institutionalized Children

An institutionalized child is considered as a one-person household since he/she is not living with his/her actual family as an economic unit. The RCCI need not obtain an application or signature from an adult household member. Since an institutionalized child is defined as a family of one, program eligibility for institutionalized children is based on income received by the child; the family's income is not included. **Payments from any source directly received by the institution on a child's behalf are not considered as income to the child. Only the income a child earns from employment and/or personally receives while in residence at the institution is considered as income.**

In order to properly document the eligibility of institutionalized children, an RCCI may use one of the following methods:

- Eligibility Roster – if an RCCI does not have a predetermined policy which dictates the allowable income to children, then it must record eligibility determinations, by child, on a

roster. A [sample roster](#) is available on our website. The roster must include the following information:

- Child's name
 - Child's date of birth
 - Date of eligibility determination
 - Category of eligibility
 - Approving official's signature/initials
- Documentation of either the Statement of Facts or the Eligibility Roster must be maintained.

Day Students Attending RCCI:

Day students are children who attend, but do not reside in the RCCI. A student's eligibility for free, reduced, or paid meal benefits is determined based on traditional methods of certification. This includes direct certification, a household eligibility application, and/or homeless/migrant/runaway/HeadStart documentation. Please refer to the Certification section of the [Administrative Handbook](#) for more information on certification of meal benefits. Documentation must be maintained for the eligibility determination of all day students.

Point-of-Service Counts

To receive reimbursement, sites must accurately count, record, and claim the number of meals actually served to students by category: free, reduced-price, and paid. The number of meals served free, reduced-price, and paid claimed for reimbursement must have adequate documentation on file to support the claim.

Meals must be counted daily at that point in the food service line where it can be determined that a reimbursable meal, containing all required components, has been served to an eligible student. It is NOT recommended that a student take point-of-service counts. Rather it is preferred that a trained adult, school employee, or volunteer take the counts. Any alternative point-of-service counting methods must be approved by the Illinois State Board of Education Nutrition Programs Division.

Meal count systems that are **not acceptable** include the following:

- Attendance, tray, classroom, delivery, or entrée counts
- Cash converted to meals
- Category/cash back-out system

- Counts taken anywhere other than the point of service, such as the beginning of the service line
- Counts of tickets sold and distributed
- All cash line

Meal counting systems that **are** acceptable include the following:

- Roster/Meal Participation Record (Sample included at the end of this section)
- Tickets
- Tokens
- Computerized point of sale with ID cards, pin numbers, biometrics, etc.
- Checklist

See section of Administrative Handbook on overt identification for information on using a meal counting system that prevents children from knowing which children are eligible for FREE, REDUCED, or PAID meals.

Verification

Verification is the confirmation of eligibility to receive free and reduced-price meals under the NSLP and SBP. Verification is only required when eligibility is determined through the use of a Household Eligibility Application. Basically, the verification process involves requesting documentation of information provided on a household application. Once that documentation is received, the Verification Summary Report must be completed and submitted to the Illinois State Board of Education (ISBE).

The requirements for verification are different for those children that reside in the RCCI verses day students (if applicable).

- Institutionalized Children – the verification process is not required, due to the fact that children residing in a RCCI do not complete Household Eligibility Applications. However, the Verification Summary Report must be accessed and some general information provided, instructions regarding information that will be submitted on the Verification Summary Report will be provided annually.
- Day Students – the verification process is required. Day students must be certified for meal benefits through direct certification or Household Eligibility Application; therefore, the verification process and the Verification Summary Report are required for any day students. Please view the Verification Section of the [Administrative Handbook](#) for further instructions.

Menu Planning

The USDA required Food Based Meal Pattern provides for required serving sizes of specific food components based on the grade of the child. The required food components include:

- Meat/meat alternate
- Grains
- Fruit
- Vegetables and
- Milk

Most RCCI's operate 7 day per week, please see below for the meal pattern requirements for 7 day a week facilities.

Breakfast

7-day School Week- Breakfast	Grades K-5 Weekly (daily)	Grades 6-8 Weekly (daily)	Grades 9-12 Weekly (daily)
Fruits (cups)	7 (1)	7 (1)	7 (1)
Grains (oz eq)	10-14 (1)	11-14 (1)	12.5-14(1)
Fluid Milk (cups)	7 (1)	7 (1)	7 (1)

Lunch

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

Age/Grade Group Exemption

The United States Department of Agriculture (USDA) recently released information that allows Residential Child Care Institutions (RCCIs) meeting certain requirements to serve one meal pattern even when the age/grades being served span more than one age/grade group. The age/grade groups are set forth in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) meal patterns.

Specifically, this policy (SP 48-2013) applies to all RCCIs that:

1. Consist of more than one age/grade group; and
2. Have legitimate safety concerns.

For these facilities, ISBE *may* permit the RCCI to serve NSLP/SBP meals with the same amount of food at the meal service. In such cases, RCCIs shall serve meals meeting the NSLP meal pattern in effect for the highest age/grade group represented, to ensure nutritional adequacy.

If an RCCI meets these requirements and wishes to request implementation of this exemption, approval must be obtained approval from ISBE prior to implementing the option. ISBE will consider RCCI requests to implement this option on a case-by-case basis and must ensure that all criteria are met. Please submit such request in writing to ISBE at cnp@isbe.net. Each request must include the following information:

1. Name of Sponsor
2. Agreement Number
3. ISBE Site Name(s)
4. ISBE Site Number(s)
5. A statement(s) stating how this site(s) meets all of the requirements listed above, as required by USDA.

Other Menu Planning Requirements

There are additional menu planning requirements that are required of all participants in the School Based Child Nutrition Programs that are not specific to RCCI's. More information on those requirements are in the Menu Planning section of our [Administrative Handbook](#). Additional topic areas in the Menu Planning section include:

- Daily Production Records
- Standardized Recipes
- In-depth information regarding each of the five required food components
- Whole Grain Rich requirements
- Offer vs. Serve
- Meal pattern requirements for the After School Snack Program

On-Site Review Requirements

National School Lunch Program (NSLP) regulations require each school food authority (SFA) with more than one site where reimbursable meals are served to annually conduct their own review of each site's meal count and claiming procedures. ISBE recommends even districts with one site perform an annual on-site review of meal counting and claiming procedures. Although required for NSLP, ISBE recommends SFAs review both NSLP and SBP, especially if meal service times have different staff performing the meal counting function.

This review must be completed by February 1 of each school year for each site. The individual should be familiar with program rules and should be outside the daily operations to provide an objective look at the operations. The review must be conducted by SFA personnel and may not be conducted by contracted parties who are providing the meal service. A sample copy of the [On-Site Review Form](#) is available on our website.

A copy of the on-site review must be maintained on file at the site or SFA office for three years plus the current year or in the case of an audit or investigation which extends beyond the three years plus current year, documents must be kept until the audit or investigation is completed.

If the review disclosed problems, the SFA must correct problems immediately and conduct a follow-up review within 45 calendar days of the initial review. A follow-up review must be conducted to determine if the corrective action resolved the problem. Written documentation is required to be maintained at the SFA or at the site.

On-site reviews are conducted to ensure at each meal service claimed, the following internal controls are operating correctly:

- Daily meals counts by category are taken at the point of service
- All meals claimed meet meal pattern requirements
- Overt identification is prevented
- Sanitation procedures are followed

Local Wellness Policy

Any school that participates in a program authorized under the National School Lunch Act or the Child Nutrition Act must establish a Local Wellness Policy with the objectives of:

- Setting goals for nutrition education, physical activity, and promoting student wellness
- Setting nutrition guidelines for all foods available on school campus during the school day
- Assuring nutrition guidelines for school meals will not be less restrictive than federal policy
- Establishing a plan for measuring effectiveness

- Involving physical education teachers, school health professionals, parents, students, and representatives from the SFA, school board, school administration, and the public in the development of the Local Wellness Policy

Beginning school year 2011-2012

- Team of collaborators' purpose is expanded beyond the development of a local wellness policy to include the implementation of periodic review and updates.
- LEAs are to permit physical education teachers and school health professionals on the team of collaborators to develop and review local wellness policy.
- LEAs are to inform and update the public (including parents, students, and others in the community) about the content and implementation of the local wellness policies. LEAs are also required to make available to the public an assessment of the local wellness policy including:
 - The extent to which schools are in compliance with the local wellness policy;
 - The extent to which the LEA's local wellness policy compares to model local school wellness policies; and
 - The progress made in attaining the goals of the local wellness policy.

Acceptable methods for informing and updating the public may include dissemination of printed or electronic materials to families of school children and other members of the community at the beginning of the school year and/or posting on the district or school website. Whatever method is chosen, the information must be made available to the public by LEAs in an accessible, easily understood manner.

For additional guidance on the requirements of the Local Wellness Policy including templates and the required evaluation process, visit <https://www.isbe.net/Pages/Local-School-Nutrition-Wellness-Policy.aspx>.

Additional Requirements for All School Based Child Nutrition Programs Participants

This guidance is intended as a supplement to the School Nutrition Programs [Administrative Handbook](#), to provide additional instructions that are specific to RCCI's. For a complete listing of all program requirements it is recommended that SFAs view the full Administrative Handbook.

Special Milk Program (SMP)

Special Milk Program (SMP)

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Additional Resources

- Administrative Handbook
<https://www.isbe.net/Pages/SchoolNutritionAdminHandbook.aspx>
- Instructions for Online Applications and Claims
<https://www.isbe.net/Pages/School-Nutrition-Applications-and-Reports.aspx>
- Program Notification & Household Eligibility Application
<https://www.isbe.net/Pages/Household-Eligibility-Resources.aspx>
- Civil Rights
<https://www.isbe.net/Pages/Nutrition-and-Wellness-Civil-Rights-Compliance-and-Enforcement.aspx>

Special Milk Program

The Special Milk Program (SMP) provides milk to children in schools, child care institutions, and summer camps that do not participate in other Federal child nutrition meal service programs.

The program reimburses sponsors for the milk they serve.

Schools in the National School Lunch or School Breakfast Programs also may participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs.

Eligible Participants

Enrolled children may participate in the Special Milk Program if they attend a:

- School
- Child care institution and are under 19 years of age
- Split-session kindergarten classes or vocational program and are not present during federally supported breakfast or lunch service with access to milk
- Camp

Sponsor Responsibilities

Sponsors must ensure:

- The same types of fluid milk are made available to everyone.
- Only 1% and skim flavored or unflavored milk can be offered.
- Claims are made in terms of the number of half-pints served.
- The program is operated as a non-profit milk service.
- Revenue is used only for the operation or improvement of milk services.

Taking / Maintaining Accurate Milk Counts & Documentation Retention Requirements

At a minimum, SFAs must maintain the following records for three years plus the current or longer if a review remains open:

- If participating in the free option (see below) - Documentation showing student eligibility for free milk must be maintained: Household applications; direct certification list; categorical eligibility listing.
- Milk counting and claiming documentation.
- Documentation of individual child's attendance on a daily basis.

Visit the ISBE website for current [Reimbursement Rates](#).

SMP Options

Pricing - Free Option

- Household Eligibility Applications are required for students desiring free milk. Milks are “priced” for students who do not meet the eligibility requirements for free milk. Served milks are counted and claimed in the correct categories. SFAs set their own prices for paid milk, but must operate as a non-profit program. Paid milks are reimbursed at the current reimbursement rate. For free milks, reimbursement is the average cost per half-pint milk. The program must run as a non-profit program.

Pricing - Paid Option

- Household Eligibility Applications are not required. All students are charged the same. Students can be charged up to the difference between the program cost (milk + administration) and current reimbursement rate. The program must run as a non-profit program

Non-Pricing Paid Option

- Household Eligibility Applications are not required. All students are charged the same, but the milk is not “priced” per milk. The students pay a lump sum, such as on a weekly, monthly or annual basis, perhaps included as part of tuition.

Annual Application

The SFA must enter into a written agreement with the State Agency (SA), this agreement sets forth the conditions for operating the program(s). The annual application, which includes both the Agreement and the Policy Statement, are required each year to be eligible to participate. The program year for the School Nutrition Programs runs July 1-June 30 and the annual application generally is available in April and due by May 30th of each year. Instructions for completing the annual application are available under the blue and yellow question mark icon in the WINS system or under What’s New on our Nutrition Programs [main webpage](#). Additionally, basic information about the WINS system can be found in the WINS section of the Administrative Handbook.

Certification of Eligibility for Meal Benefits - Free Option Only

Program Notification & Household Eligibility Applications

Near the beginning of each school year, the [letter to household](#), household eligibility application (HEA) and application instructions announcing the availability of nutrition programs must be distributed to all households. An LEA may not only make available the HEA during registration, the HEA must be distributed to all households. Distribution may occur by postal service, emailed to parents/guardians or included in packets of materials provided directly to the students or households.

NOTE:

If your Sponsor is in NSLP for some grade levels but SMP only for ½ day students, like a ½ day PreK program, you do have access to the Direct Certification System. Therefore, the Direct Certification System can be used first to determine students eligible for free benefits. Any students not found in Direct Certification will need to be provided a HEA.

If you're only in the SMP, you do not have access to the Direct Certification System, therefore HEAs will need to be distributed to all households.

Additional instructions for utilization of the Direct Certification System can be found in the Electronic Direct Certification section of the [Administrative Handbook](#).

Certification of Eligibility

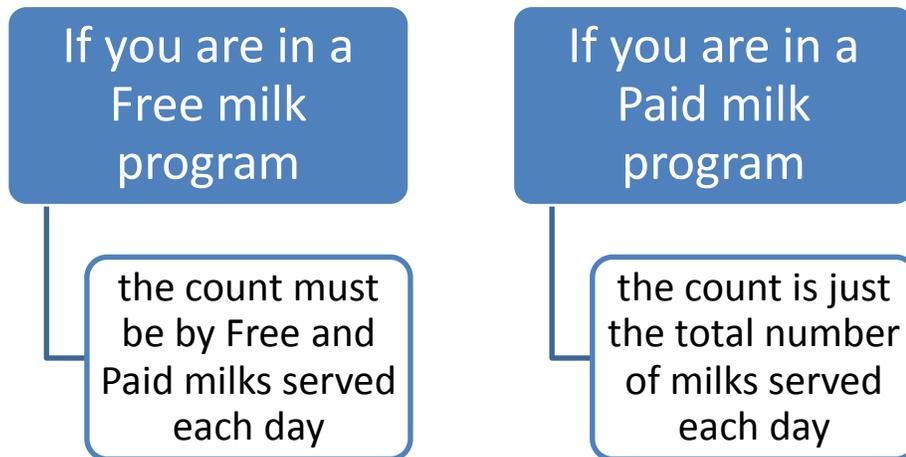
Benefits can be issued using one of following methods:

1. SFA's also in the NSLP and/or SBP - Categorical Eligibility via the Electronic Direct Certification System—*Students Receiving Supplemental Nutrition Assistance Program (SNAP) or Temporary Assistance to Needy Families (TANF)* including the extension of such benefits to ALL household members. (This is discussed in the *Electronic Direct Certification* section of this handbook in detail.)
2. Categorical Eligibility—homeless/migrant/runaway/Head Start listing from local coordinator
3. Household Eligibility Application
 - a. Based on household income
 - b. Based on valid SNAP or TANF case numbers provided on the application including the extension of such benefits to ALL household members

For more information on each of these types of certification, timeline requirements and notification requirements, view the Electronic Direct Certification and the Certification sections of the [Administrative Handbook](#).

Milk Counting & Claiming

To receive reimbursement, sites must accurately count, record, and claim the number of milks actually served to students.



Elements of an acceptable counting and claiming system include:

1. Eligibility Documentation (Free Milk Program ONLY)

The SFA must have documentation to claim free milks for reimbursement. Documentation can be a Household Eligibility Application, Direct Certification list, homeless and/or migrant liaison list, Head Start list, list of residential students in RCCIs, non-applicants approved by local officials or another approved method.

2. Collection Procedures

The SFA must prevent overt identification at the medium of exchange to keep students' eligibility for free milks confidential.

3. Point-of-Service Counts

Milks must be counted daily at that point in the service line where the milks are provided to students. It is NOT recommended that a student take point-of-service counts. Rather it is preferred that a trained adult, school employee or volunteer take the counts. Any alternative point-of-service counting methods must be approved by the Illinois State Board of Education Nutrition and Wellness Programs Division.

For more information on appropriate milk counts view the Benefit Issuance and Meal Counting & Claiming section of the Administrative Handbook.

Civil Rights Requirements

The purpose of this information is to notify participants of the Federal School Nutrition Programs of program policies regarding civil rights and provide guidance on nondiscrimination in the administration of these programs.

This information outlines specific responsibilities, requirements, and procedures for federally-assisted programs to ensure federal, state, and local compliance with the provision of Title VI of the Civil Rights Act of 1964, as amended; Title IX of the Education Amendments of 1972; and Section 504 of the Rehabilitation Act of 1973.

After each specific responsibility/requirement is identified, suggested ways to meet the responsibility/requirement are listed.

SFA Responsibilities

Data Collection (Only required for those in a FREE milk option)

- Collect and maintain data regarding the target population by racial/ethnic category. Examples include fall housing report, census data, demographic maps, and data provided by child nutrition program participation approval letter.
- Collect and maintain racial/ethnic participation documentation. Methods include staff observation or voluntary self-identification by applicants on the free and reduced-price application forms.
- Maintain all program information for three years plus the current year. Safeguards should be exercised to ensure the data is available only to authorized personnel.

Program Operations

- Denied free applicants should not be disproportionately composed of minority groups. (only applies to those in a FREE milk option)
- Admission procedures should not restrict enrollment of minority persons.
- Program operations should not discriminate against participants based on race, color, national origin, sex, age, or disability. Examples include seating arrangements, serving lines, assignment of eating period, and selection of applications for verification.

Training

- The SFA must provide civil rights training to their sub recipients, including *front-line staff*, on an annual basis.
- *Frontline staff* is defined as those who interact with program applicants or participants and those persons who supervise frontline staff.

- Specific subject matter for training must include: collection and use of data, effective public notification systems, complaint procedures, compliance review techniques, resolution of noncompliance, requirements for reasonable accommodation of persons with disabilities, requirements for language assistance, conflict resolution, and customer service.
- ISBE has developed resources to assist you meeting these annual training requirements, which are posted on our [website](#).

Public Notification

- Display in a prominent place a USDA poster containing the nondiscrimination statement and the federal procedure for filing a complaint. Posters may be obtained by contacting Nutrition Programs, Illinois State Board of Education at 800.545.7892 or cnp@isbe.net. Please provide us with the name of the sponsor, the name of the contact person, the address to send the posters to and the number of posters that you need.

Printed Materials

All printed school nutrition program informational materials, such as free and reduced-price meal notification letters and public releases, must include the nondiscrimination statement and complaint procedures (see following page).

- The USDA has determined that using the shortened statement (*This institution is an equal opportunity provider*) can only be used in very limited instances. It is based on the intent and/or audience that will be viewing the material. It is recommended that the full statement be used in most cases.
- Provide information in the appropriate translation concerning the availability and nutritional benefits of the school nutrition program, as needed. This requirement can be met through the use of bilingual staff members, volunteers, and/or informational materials in appropriate languages.
- Provide school nutrition program information to the parents and local minority and grassroots organizations upon request; examples include letters, brochures, and public releases.
- Develop and implement a procedure to process civil rights complaints. A civil rights complaint procedure may be developed by the SFA. Persons who believe they have been discriminated against in any USDA-related activity may be advised to write: *USDA, Director, Office of Adjudication, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call toll free (866) 632-9992 (Voice). Individuals who are hearing impaired or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).*

NONDISCRIMINATION STATEMENT AND COMPLAINT PROCEDURES
(Must be included on all school nutrition program informational materials)

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 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.

Procurement of Milk and Supplies

The United States Department of Agriculture has implemented regulations for the procurement of food and supplies for sponsors of the NSLP, SBP, **SMP**, and Fresh Fruit and Vegetable Program (FFVP). The chart below provides the specific citations and provisions in the law.

	Public Schools and Public Residential Child Care Institutions	Private Schools and Private Residential Child Care Institutions
Program Regulations	7 CFR Parts 210, 215, 220, and 245	7 CFR Parts 210, 215, 220, and 245
Procurement Rules Access on the U.S. National Archives and Records Administration website at http://www.gpoaccess.gov/fr/index.html .	Part 3016 Sections: 3016.36(b)–(i), 3016.60 2/, 3/	Part 3019 Sections: 3019.40–48
Allowable Cost Rules Access OMB Circulars on the Office of Management and Budget website at http://www.whitehouse.gov/omb/ .	A-87	A-122
Small Purchase Threshold	Lesser of \$150,000; state or local rules	Lesser of \$150,000 or organization’s rules
Anticompetitive Practices	Potential contractors may provide information. Potential contractors cannot prepare procurement document or contract information.	Potential contractors may provide information. Potential contractors cannot prepare procurement document or contract information.
Geographical Preferences	Geographical preferences are prohibited.	Not applicable

Competitive Bidding

Competitive bidding involves publicly soliciting sealed bids for a firm, fixed-price contract and awarding the contract to the responsive and responsible bidder whose bid is lowest in price.

Federal regulations require SFAs receiving federal assistance to competitively purchase food and supplies, equipment, and services when the aggregate amount to be purchased is \$150,000 or more. **For public schools only**, Illinois School Code states that all purchases, except perishable food and beverages in excess of \$25,000 (or a lower amount as required by district board policy), must be competitively bid and awarded to the lowest responsible bidder. The \$25,000 level refers to aggregate purchases on an annual basis.

The chart below details when competitive bidding must be conducted.

TYPES OF ITEMS	ANNUAL AMOUNT OF PURCHASES
Milk or fresh dairy products	In excess of \$150,000
Fresh bread	In excess of \$150,000
Fresh produce	In excess of \$150,000
General groceries	In excess of \$150,000
Vended meals	In excess of \$150,000
Supplies	In excess of \$25,000
Equipment	In excess of \$25,000
Food service management services	In excess of \$25,000

The \$150,000 amount is determined by examining the manner in which milk has been purchased in the past. If using vendors that supply only one particular type of product, such as bread, milk, or meat, the competitive bid process must be implemented when the amount of purchases is in excess of \$150,000 per type of product.

When multiple vendors, such as full-line vendors, supply various items such as canned, frozen, and dry goods, the total annual purchase amount for all the vendors must be added together. If this amount is in excess of \$150,000, the food must be competitively bid. However, if supplies, equipment, or any non-food items are purchased from the full-line vendor in addition to the food items, the \$25,000 threshold becomes applicable.

General Procurement Requirements

All procurement transactions must be conducted in a manner that provides maximum open and free competition. Procurement procedures must ensure they do not foster noncompetitive practices between firms, do not create organizational conflicts of interest, and do not restrict or eliminate competition. Procurement must not place unreasonable requirements on firms, require unnecessary experience, or establish unrealistic bonding requirements. Cost plus a percentage of purchase is not an allowable system. There must be descriptions of all products purchased, and identical instructions provided to all potential vendors.

Formal standards of conduct should govern the performance of officers, employees, and agents in the award and administration of contracts. These standards should provide that officers, employees, or agents should not solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties of sub-agreements.

SFAs must have written selection procedures for awarding contracts. Records should be maintained to detail the significant history of procurement. These records must include, but are not necessarily limited to, the following: rationale for the method of procurement, contractor selection or rejection, basis for the cost or price, and documentation for change orders.

Informal Bidding Procedures

If the purchases for perishable foods and beverages do not exceed \$150,000 or the purchases for supplies and/or equipment do not exceed \$25,000 as described above, informal bidding procedures may be used. The following steps should be part of the informal bidding process:

- Develop a written purchase description of the services/items being solicited;
- Solicit quotes/bids from three or more potential vendors based on the purchase description; document vendor names along with the date and method of contact—be sure to maintain full and open competition;
- Record all quotes/bids received and any notification received from vendors declining to bid;
- Evaluate the quotes for conformance to the purchase description;
- Award the purchase/contract (record the justification for the award); and
- Maintain all documents on file for potential audit purposes.

Formal Bidding Procedures

The following bid requirements must be implemented to ensure compliance with state statutes and federal regulations.

- The Invitation to Bid, including specifications and attachments, must define the items or services needed in order for the bidders to properly respond to the invitation.
- Bids must be solicited from an adequate number of known suppliers, defined as a minimum of three prospective suppliers; be sure to maintain full and open competition.

- The proposed procurement must be publicly advertised in at least one public notice at least ten days before the bid date in a newspaper of general circulation.
- Sealed bids are accepted.
- The bids must be publicly opened and read aloud.
- Award the contract to the responsible bidder whose bid, conforming to all the material terms and conditions of the Invitation to Bid, is lowest in price.
- Maintain all documents on file for potential audit purposes.

Monitoring/Reviews

Participants that are only in the Special Milk Program are not required to have regularly scheduled reviews of their programs. However, the State Agency can contact a participant to schedule a monitoring review at any time.

Local Wellness Policies

Note: [Public Act 102-0359 \(School unused food sharing plan\)](#) became effective August 13, 2021 in Illinois. This Public Act amends the IL School Code by adding Section 2-3.182, which requires school districts to incorporate a food sharing plan for unused food focused on students in need into their Local Wellness Policy. Plans must be consistent with the Richard B. Russell National School Lunch Act, as well as accompanying USDA guidance on the Food Donation Program, in addition to following applicable federal and state regulations and sanitation codes. Districts should work closely with their Local Health Department when developing plans. [The Local Wellness Policy content requirements outlined in this chapter](#) are updated to reflect this change.

Local Wellness Policies

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Additional Resources

- ISBE Local School Wellness Policy Information Webpage
<https://www.isbe.net/Pages/Local-School-Nutrition-Wellness-Policy.aspx>
- USDA Local School Wellness Policy Webpage
<https://www.fns.usda.gov/tn/local-school-wellness-policy>

Introduction

A Local School Wellness Policy is a written document that sets the framework for a healthy school environment through goal setting and policy making. Local Wellness Policies were established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004. In 2010, the requirements of Local Wellness Policies were strengthened by the Healthy, Hunger-Free Kids Act (HHFKA). Under 7 CFR 210.31(a), all sponsors participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) are required to have a Local Wellness Policy for all participating sites under their jurisdiction.

Policy Content Requirements

7 CFR 210.31(c) requires, at a minimum, that the content of the Local Wellness Policy must include:

- Specific goals for 1) nutrition promotion, 2) nutrition education, 3) physical activity, and 4) other school-based activities that promote wellness
- Standards for NSLP and/or SBP meals, which must meet the USDA meal pattern requirements and dietary specifications at a minimum
- Standards for competitive food and beverage items sold to students on the school campus during the school day. This includes items sold outside the reimbursable NSLP and/or SBP meals, such as à la carte items and vending machines. Competitive food and beverage items must meet Smart Snacks in Schools nutrition standards (refer to Handbook Section D—USDA Smart Snacks for additional guidance).
- Standards for all foods and beverages provided, but not sold to students, on the school campus during the school day. Examples include food and beverages given away as rewards or during celebrations.
- Policies for food and beverage marketing on the school campus during the school day. USDA regulations only allow marketing of food and beverage items that meet the Smart Snacks in Schools nutrition standards.
- Identification of the position of the school or organization official(s) responsible for the implementation and oversight of the Local Wellness Policy
- A description of how the school community and the general public are provided an opportunity to participate in the development, implementation, review, and updates of the Local Wellness Policy (refer to the “Public Involvement and Notification” section for additional guidance)
- A description of the assessment plan of the Local Wellness Policy and the manner in which policy content and assessment results will be reported to the public (refer to the “Triennial Assessment” section for additional guidance).

Additionally, [Public Act 102-0359](#) became effective August 13, 2021 and requires Illinois school districts to incorporate a food sharing plan for unused food focused on students in need into their Local Wellness Policy.

ISBE's [Local Wellness Policy Content Checklist](#) may be used by sponsors to ensure federal and state content requirements are being met when developing policies.

Triennial Assessment

Requirements at 7 CFR 210.31(e) state that sponsors must assess each participating site's compliance with the Local Wellness Policy at least once every three years. This is referred to as the triennial assessment. The first triennial assessment was required to be completed no later than June 30, 2020. Please note, some sponsors may have extended their triennial assessment due date to [June 30, 2021](#) or [June 30, 2022](#) under USDA waivers due to the COVID-19 Public Health Emergency.

The triennial assessment must measure:

- The extent to which schools are in compliance with their Local Wellness Policy
- The extent to which the Local Wellness Policy compares to model policies
- A description of the progress made in attaining the goals outlined in the policy

Sponsors may develop their own triennial assessment tool or may use the ISBE Triennial Assessment Template, which can be found on ISBE's [Local Wellness Policy webpage](#). Completed triennial assessments should be kept on file with the sponsor for review by an ISBE monitor during an Administrative Review of the School Nutrition Programs.

Leadership

Sponsors must establish one or more officials within the organization who have the authority and responsibility to ensure each participating site complies with the Local Wellness Policy. Sponsors may use their discretion when selecting an official. The position title of the official(s) must be identified in the policy. While not required, sponsors are encouraged to also provide contact information.

Public Involvement and Notification

7 CFR 210.31(d) requires sponsors to permit participation by the general public and the school community in Local Wellness Policy processes in order to promote transparency and inclusion. The school community may include, but is not limited to, parents, students, SFA representatives, teachers, school health professionals, school board members, and school administrators.

Examples of the general public include local healthcare providers and community organization representatives. It is at the discretion of the sponsor on how stakeholders are invited to participate. Examples include sending letters to households, website and social media postings, and partnering with community organizations to spread information. Language regarding communication/promotion practices are required to be present in the Local Wellness Policy.

Additionally, sponsors must inform the public about the content and implementation of the Local Wellness Policy, and make the policy and any updates available to the public on an annual basis. Sponsors are also required to inform the public about progress made toward meeting the goals of the Local Wellness Policy, including compliance with the policy by making the results of the triennial assessment available to the public in an accessible and easily understood manner.

Recordkeeping

7 CFR 210.31(f) requires sponsors to maintain record of the Local Wellness Policy. This includes keeping a copy of the current wellness policy on file and maintaining documentation of 1) the most recent assessment of the policy, 2) how the wellness policy and assessments were made available to the public, and 3) efforts to review and update the policy, including the individuals involved and the efforts made to notify stakeholders of their ability to participate in the process.

Training and Resources

ISBE has developed several resources to assist schools with Local Wellness Policy implementation, all of which can be found on ISBE's [Local Wellness Policy webpage](#):

- Local Wellness Policy Fact Sheet
- Local Wellness Policy Template for Schools
- Local Wellness Policy Template for Residential Child Care Institutions (RCCIs)
- Local Wellness Policy Content Checklist
- ISBE Triennial Assessment Template
- Content Requirements & Triennial Assessment Training Webinars

Additional resources can be found on USDA's [Local Wellness Policy webpage](#), including:

- Local School Wellness Policy Outreach Toolkit
- Team Nutrition Popular Events Idea Booklet
- Policy Guidance Documents

