

2019 National School Lunch Program Training Frequently Asked Questions (FAQ)

This FAQ provides answers to the most frequently asked questions of the School Nutrition Programs team during the 2019 National School Lunch Program (NSLP) annual training conducted in July and August of 2019. Please contact your assigned program specialist for any additional questions.

National School Lunch Program Application

Question 1: When does the NSLP application open and where can I find that information?

The NSLP application opened in early July. Application information is communicated by the School Nutrition Programs team via email and the <u>Beyond the Tray newsletter</u>. To access the NSLP application, log into <u>Orchard</u>. For current instructions on completing the application, reference the <u>NSLP Self-Guided Resource</u> and <u>NSLP Application Required Documents Checklist</u>.

Question 2: Which year's data should be used to complete the Site Information Form (SIF)?

Use 2019-20 school year data to complete the SIF.

Local Wellness Policy

Question 3: When is the new Local Wellness Policy (LWP) going to be released, and when will my school be expected to use the new template?

The new LWP template will be released soon; a specific date has not been determined. When released, the Office of the State Superintendent of Education (OSSE) will email the template to School Food Authorities (SFAs) and include in the Beyond the Tray newsletter. SFAs are encouraged but not required to use the new template. SFAs that choose not to use the template will need to include all federal and local requirements in their LWP and seek OSSE approval. All SFAs are required to evaluate their LWP every three years at minimum, and update or modify their LWP as needed.

Menu Documentation

Question 4: Is there a standard production record and where can we find it?

OSSE's production record templates can be found <u>here</u>. SFAs that want to use a record other than OSSE's template must submit a production record to their program specialist for review and approval before use.

Question 5: Do weekly component reports come before or after receiving food?

Weekly component reports are important planning documents. Food Service Directors should request a weekly component report from the vendor prior to the approval of a cycle menu and also whenever menu substitutions or permanent changes are made to the cycle menu.

Question 6: How often should I be reviewing weekly component reports?

OSSE recommends reviewing weekly component report prior to approving a cycle menu.

Question 7: My school nutrition program meals are provided by a vendor. Is the vendor responsible for providing the weekly component reports?

SFAs that have contracted with a food service vendor should reference their contract for specific requirements. Generally, food service vendors are required to provide meals in compliance with federal nutrition standards and provide documentation to support this. The weekly component report is a document used to show compliance with federal nutrition standards. OSSE recommends requesting and reviewing weekly component reports prior to approving cycle menus.

Question 8: Weekly component reports provide a lot of information. How can I quickly tell if my provided meals are in compliance or not?

Most likely, weekly component reports are color coded. Meal components in red mean the item does not meet the meal pattern requirement, while components in green mean the item does meet the meal pattern requirement.

If your report is not color coded, it will often show "no" and/or "yes," or "pass" or "fail" to let you know if a component meets the requirement.

If you receive a report with errors clearly marked in red, or that have the words "no," or "fail" next to a component, OSSE recommends alerting the vendor to the error, and requesting both meals and documentation be updated accordingly. If you are unclear as to how to decipher your weekly component reports, please reach out to your vendor or OSSE program specialist for assistance.

Question 9: When looking at the compliant version of the weekly component report is it ok to exceed weekly maximums for grains and meat?

Yes. Weekly component requirements may be exceeded as long as serving more of a component does not put your meals out of compliance with nutrient requirements (such as calories).

Offer versus Serve (OVS)

Question 10: Is there a difference in what an SFA submits for schools operating offer versus serve (OVS) as opposed to schools operating a serve only model?

SFAs will designate if they are operating OVS or serve in their NSLP application. Reimbursable meal signage should match the chosen service model and should be visible to students in the cafeteria.

Question 11: How do I decide if my school operates OVS or serve?

For more information, reference the Offer versus Serve Guidance.

Question 12: If I want to change my school's serving model during the school year, what information do I need to update?

To update a school's serving model mid-year, update the model chosen in the SIF within the NSLP application in Orchard prior to implementation.

Question 13: During an administrative review (AR), how does my reviewer know which serving model my school utilizes?

During an AR, OSSE program specialists will reference the NSLP application to determine which serving model the school is operating. The specialist will then observe the model on-site to determine if the operating model is being executed correctly.

Question 14: Can OSSE provide some best practices for running an OVS lunch line?

One of the best ways to operate OVS is to set up the line in an efficient manner and make sure students and teachers know what constitutes a compliant meal. Placing the fruit and vegetable components at the beginning of the line and the entrée at the end will help to make sure your line moves quickly and efficiently. For additional resources, reference the <u>Offer versus Serve Guidance</u> and <u>Tips Sheets</u>.

Question 15: Can I operate OVS in a middle school setting or must I operate serve only?

Middle schools may operate either model.

Question 16: Is there a cheat sheet for operating OVS? It's too much information to absorb.

USDA just released some great tip sheets for OVS. You are encouraged to use them in your programs.

Question 17: When operating OVS, how should a school know which components of the meal were served and how much of each component was served?

Schools should record the number of servings of each component prepared or delivered. After service, count the remaining number of portions of each component. A school can determine the number of each component served by subtracting the remaining amount from the amount prepared or delivered.

Food Safety

Question 18: If my vendor is serving the food, when do I as the SFA have to check the temperature of the food?

If the vendor is responsible for serving the meals, SFA staff are not responsible for checking temperature of the food daily; however, OSSE recommends monitoring food service vendors regularly to ensure safe food handling practices. OSSE recommends reviewing the vendor's production records weekly to ensure temperatures are taken routinely. SFAs with more than one site are required to:

- Monitor each site's lunch program by Feb. 1 annually
- Monitor 50 percent of breakfast programs annually
- Monitor after school snack programs once within the first four weeks of service, and
- Monitor after school snack programs six months after the initial review.

Question 19: If a vendor does not provide the production record with a meal, what do we do about temperatures?

In the event that the vendor does not provide a production record or the temperature section of the production record is incomplete, it is important to determine if the food is safe to serve to students. In this instance, the SFA should take the temperature of all food when it arrives. If the food is at a food safe temperature, it can be served. If it is not, work with your vendor to see how long the food has been

in the temperature danger zone and determine if it can be served to students. Record temperatures somewhere else to be filled into the production record later.

Record Retention

Question 20: Can I scan and shred my production record?

Yes, please ensure that you save the scanned production record electronically so they are easily accessible at a later date.

USDA Foods

Question 21: I want to use more USDA Foods, but have limited storage capacity. Can OSSE assist with storage?

Utilizing direct delivery USDA Foods is challenging for many DC schools due to limited storage capacity. A USDA Foods Storage Survey was released by OSSE's Food Distribution Program in July 2019 to explore SFAs' interest in using their Planned Assistance Level (PAL) to order direct delivery USDA Foods. While that survey is now closed, please look out for additional details and information about USDA Foods from Elizabeth Hanna, program specialist.

Question 22: Is there a list of USDA foods?

The <u>USDA Foods Available list</u> includes items available as bulk for further processing (highlighted in yellow) and direct delivery USDA Foods.

Question 23: Schools need to have emergency food on hand. Can we use our USDA Foods for emergency foods?

Yes, USDA Foods can be used for emergency feeding. Please see the <u>USDA Foods During Disaster</u> webpage for more information.

Procurement

Question 24: Are micro purchasing and simplified acquisition thresholds only for NSLP?

The micro purchasing and simplified acquisition thresholds are for all Child Nutrition Programs.

Eligibility

Question 25: New and transfer students coming from a school participating in the Community Eligibility Provision (CEP) must receive free meal benefits for a minimum of 10 operating days and up to 30 operating days. How do you know if a new or transfer student came from a school participating in the CEP? It would be helpful if OSSE put out some sort of list.

If possible, OSSE recommends contacting the school as soon as possible to determine if the school participated in CEP. OSSE plans to release a list of schools participating in CEP annually prior to the start of each school year.

Question 26: What if a student is transferring from a non-CEP school to a non-CEP school? How do I verify their eligibility for free or reduced price meals?

Per USDA Food and Nutrition Services, if a student is transferring within a local education agency (LEA) from a non-CEP school to a non-CEP school, the student's eligibility for free and reduced price meal benefits must transfer along with the student. If a student is transferring between LEAs from a non-CEP school to a non-CEP school, the student's eligibility for free and reduced price meal benefits may transfer along with the student. The new school will not incur liability for the accuracy of the former determination. While accepting an eligibility determination from another LEA is not required, it is a best practice and may ease the student's transition to the new school by ensuring there is no break in meal service.¹

Question 27: Should schools send Free and Reduced-price Meal (FARM) applications to students who are not directly certified?

Yes, schools not participating in the CEP should send home to families of students who are not on the direct certification list, a FARM application with instructions on how to complete the application. Templates for these letters can be found here.

Question 28: Can we directly certify DC residents in Maryland schools?

Currently, there is not a process in place to directly certify students living in DC and attending school in Maryland.

Breakfast

Question 29: Why is breakfast participation so low in DC? Could it be due to the fact that there are so many charter schools and students have to travel farther to school?

The District of Columbia ranks fourth in the nation for the number of breakfasts served to students qualifying for free and reduced-price meals and participating in lunch². While we are among the leaders of the nation, DC falls a little over 2 percentage points short of meeting the recommended goal, which states that for every 100 students who qualify for free and reduced price meals and participate in school lunch, at least 70 participate in breakfast. The reasons for this vary, and OSSE's Division of Health and Wellness has elevated this goal as a central component of our five-year strategic plan. We look forward to exploring further with SFAs.

Question 30: What is an alternative breakfast model?

An alternative breakfast model is a model of serving breakfast in which breakfast is offered in one or more locations with high student traffic other than the cafeteria. Examples include breakfast in the classroom (BIC) or breakfast from grab-and-go carts. With alternative breakfast serving models, breakfast is also available after the start of the school day or both before and after the start of the school day. The model must be proven to increase student participation in breakfast relative to the traditional serving model, in which breakfast is served in the cafeteria before the start of the school day. Other alternative serving models may be used but may require approval by OSSE.

¹ USDA Food and Nutrition Services. (2017). Eligibility Manual for School Meals. Available at https://fns-prod.azureedge.net/sites/default/files/cn/SP36_CACFP15_SFSP11-2017a1.pdf. Accessed on October 3, 2019. ² Food Research & Action Center. (2019) School Breakfast Scorecard School Year 2017-2018. Available at https://www.frac.org/wp-content/uploads/school-breakfast-scorecard-sy-2017-2018.pdf.

Question 31: Is the breakfast alternative model subsidy for breakfast after the bell?

Breakfast after the bell may be considered an acceptable alternative serving model. Additional details regarding the alternative breakfast serving model subsidy will be available in the fall/winter of the 2019- 20 school year.

Question 32: My school currently operates BIC. Will we be eligible for the alternative breakfast model even though it is not new for my school?

Yes.

Question 33: Will the \$2 subsidy be provided per student, per year?

Yes, a \$2 subsidy will be provided per student, per year, as long as the school is eligible to participate, submits an annual application to participate, and the application is approved.

Question 34: How is the \$2 per student subsidy structured?

Additional details regarding the alternative breakfast serving model subsidy will be available in the fall/winter of the 2019-20 school year.

Question 35: Will the \$2 subsidy be based on only the students who participate and are being served through the alternative model, or will schools get it for all students participating in breakfast? The subsidy will be provided to students in grades participating in alternative serving models. Additional details regarding the alternative breakfast serving model subsidy will be available in the fall/winter of the 2019-20 school year.

Healthy Schools Act Amendments

Question 36: Is this information being shared across other departments in OSSE? Schools have other people who are in charge of data and accountability in the school. Having this information come from a different avenue could be more persuasive.

Yes. Healthy Schools Act Amendment requirements have been shared with OSSE's Data, Assessment, and Research (DAR) division to help inform data managers of new required data submissions.

Questions 37: For the 2019-20 school year, can 1% flavored milk be served?

Yes, schools are able to serve 1% flavored milk for the 2019-20 school year.

Question 38: Why should we provide students flavored milk this year only to take it back the following year?

Schools are not required to offer flavored milk in the 2019-20 school year. Starting in the 2020-21 school year, the Healthy Schools Act requires all milk served for breakfast, lunch, after-school snack, suppers, and summer meals to be unflavored.

Question 39: Do students need 30 minutes to eat lunch?

Section 203 of the HSA requires schools to provide at least 30 minutes for students to eat lunch and sufficient time during the lunch period for every student to pass through the food service line.

Question 40: Is there a time requirement for breakfast?

Breakfast does not have to be served for a specific amount of time, but must be available after the start of the school day.

Question 41: If a student is late for breakfast, should the student still be served? Is that meal still eligible for reimbursement?

Breakfast that is served to a student who is late counts as a reimbursable meal. Per the Healthy Schools Act, breakfast must be available after the start of the school day. Please make sure every school offers breakfast to students who arrive after the start of the traditional school day.

Question 42: Are schools ineligible for federal funding if they do not follow the HSA?

As long as schools follow federal regulations for child nutrition programs, they are eligible for federal reimbursement.

Grants

Question 43: Who is eligible for the school garden grant?

OSSE will accept applications from public and public charter schools, and community-based organizations (CBOs) that support school garden programs.

Question 44: Can past awardees apply for any of the School Programs Team grants?

Yes, past awardees can apply. Please reference each grant Request for Applications (RFA) for specific preferences given to those who have not been awarded grants in the past.

Question 45: Is there a limit to how much I can apply for?

Please reference each grant RFA for specific funding amounts.

Question 46: Can schools apply for the Cafeteria Staff Training Grant at the school level or do schools need to apply at the SFA level?

Applications can be submitted at the school level, or SFA level.

Question 47: Is there a limit to how many staff can be trained with funds from the Cafeteria Staff Training Grant?

No.

Milk Substitutes

Question 48: Can soy milk substitute dairy milk?

Yes, as long as it meets nutrient requirements referenced in 7 CFR 210.10(d)(3)

Question 49: Can a school serve coconut and soy milk?

Soy milk and coconut milk can be served as part of the reimbursable meal as long as they meet nutrient requirements. If a non-dairy beverage does not meet the nutrient requirements, it can only be served as part of the reimbursable meal when a student has medical documentation to support the request.

Food Service Vendors and Management Companies

Question 50: Is there someone at OSSE who works with vendors specifically? Who works with vendor compliance?

OSSE does not have a formal relationship with food service vendors or management companies. OSSE does provide annual training for food service vendors and management companies and provides ongoing communication through the Beyond the Tray newsletter. SFAs are in formal, contractual relationships with food service vendors and management companies, and should routinely monitor those contracts to ensure compliance. Contracts include details on next steps if either party is not upholding contract requirements.