



RESIDENTIAL CHILD CARE INSTITUTION
School Nutrition Program
Manual of Operations

Residential Child Care Institution (RCCI) School Nutrition Program Manual of Operations

Developed by

Michelle Zvonar
Nutrition Program Consultant
School Nutrition Team

Jennifer Tweed, RDN, CD, LD, NDTR
Nutrition Program Consultant
School Nutrition Team



Wisconsin Department of Public Instruction

Jill K. Underly, PhD, State Superintendent

Madison, Wisconsin

This report is available from:

School Nutrition Team

Wisconsin Department of Public Instruction

125 South Webster Street

Madison, WI 53703

<https://dpi.wi.gov/school-nutrition>

Updated March 2023

Wisconsin Department of Public Instruction

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, audiotape, 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.

Contents

OVERVIEW	1
CONTRACTS AND AGREEMENTS	2
Permanent Agreement	2
Contract.....	2
Meal Service Agreements	2
MEAL ELIGIBILITY and VERIFICATION.....	2
Eligibility Determination for RCCIs With Non-Day Students	2
Eligibility documentation	2
Student income	2
Students receiving meals offsite.....	2
Eligibility Determination for RCCI With Day Students.....	3
Pricing RCCIs.....	3
Non-Pricing RCCIs.....	3
Verification	3
COUNTING AND CLAIMING.....	3
Point of Service Records	4
Claiming	4
Edit checks.....	4
Severe need breakfast.....	4
Age limit.....	4
Longer school weeks/continuous school calendar	4
Withholding Food for Punishment	5
Meals Served to RCCI Staff	5
FINANCIAL MANAGEMENT.....	5
Reimbursement.....	5
Nonprofit Food Service Account.....	5
Annual Financial Report (AFR).....	5
Revenue.....	5
Expenditures.....	6
Ending fund balance.....	6
Indirect costs.....	6
Simplified Accounting Method	6
GENERAL PROGRAM REQUIREMENTS	8
Civil Rights	8

And Justice for All poster	8
Civil rights training	8
Complaint policy.....	8
Limited English proficiency.....	8
Nondiscrimination statement.....	8
Public Release	9
Separation of Gender	9
Special Dietary Needs.....	9
Food Safety	9
Food safety requirements.....	9
Food Safety Inspections.....	10
Local Wellness Policy (LWP).....	10
Public involvement	10
Policy requirements.....	10
Onsite Monitoring.....	11
School Breakfast Program (SBP)	11
National School Lunch Program	11
Professional Standards.....	11
Hiring standards.....	11
Annual training.....	11
Training tracker	11
Outreach.....	12
School Breakfast Program	12
Summer Food Service Program (SFSP).....	12
Reporting.....	12
Records Retention.....	12
Water Availability	12
OTHER PROGRAMS.....	12
Afterschool Snack Program	12
Afterschool Snack Program Monitoring	13
Special Milk Program.....	13
Wisconsin School Day Milk Program.....	13
MEAL PATTERN AND NUTRITIONAL QUALITY	13
Meal Pattern Requirements	14
Meal Pattern Waivers	14

Meal Service	14
Family Style Meal Service	14
Signage	15
Smart Snacks	15
Claiming for Reimbursement.....	15
Facilities not using Offer vs Serve.....	15
Facilities using Offer vs Serve.....	15

OVERVIEW

A Residential Child Care Institution (RCCI) is any public or private nonprofit residential child care facility which operates principally for the care of children. The term RCCI applies to facilities with non-day students and/or facilities with day students.

An RCCI may participate in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP), Wisconsin School Day Milk Program (WSDMP) if there are eligible students in grades PK-5, and Special Milk Program (SMP) if there are eligible students who do not have access to any other United States Department of Agriculture (USDA) Meals Programs.

An RCCI is required to comply with all USDA Child Nutrition Program regulations as found in 7CFR Part 210, unless specific flexibility is given by USDA or the WI-Department of Public Instruction (DPI). However, because of the unique needs and processes of an RCCI some areas of compliance may look different than a traditional school.

[School Nutrition Team Terms and Definitions](#) describes acronyms used throughout this document.

For purposes of this manual, the terms "student", "child/children," and "resident" shall have the same meaning and shall be interchangeable.

RCCIs with non-day students (residing at the facility) and RCCIs with day students that are non-pricing and not obtaining eligibility information are exempt from:

- Free/Reduced Price (F/R) meal applications
- Direct Certification (DC)
- Verification (must still complete FNS-742-Verification Collection Report (VCR)
- Public Release
- Paid Lunch Equity tool
- Unpaid Meal Charge Policy
- Breakfast and Summer Food Service Program (SFSP) Outreach

RCCIs with day students that are pricing or non-pricing but obtaining eligibility information are not exempt from any USDA Child Nutrition Program requirements

CONTRACTS AND AGREEMENTS

Permanent Agreement

The Permanent Agreement is between the DPI also referred to as the State Agency (SA) and the School Food Authority (SFA). As the SFA, an RCCI agrees to administer the Child Nutrition Programs approved in its contract in accordance with federal regulations including policy and instructions issued by the United States Department of Agriculture (USDA) and the SA.

Contract

All RCCIs participating in the USDA School Meals Programs are required to submit an online contract through Online Services and update it annually. Applications must be submitted and approved before the beginning of the school year on July 1. Additional information, including a contract manual is found in the Contracts section of the DPI School Nutrition website.

Meal Service Agreements

If an RCCI is receiving meals from another source (not self-operating) a vended meals agreement or a memorandum of understanding (depending on the provider) between the RCCI and the meal provider is required. This is uploaded to the school nutrition contract. Additional information, including a list of meal providers, agreement templates, and policy guidance is found in the Meal Service Agreement section of the DPI School Nutrition website.

MEAL ELIGIBILITY and VERIFICATION

This section includes guidance on determining eligibility for free and reduced price (F/R) meals and ensuring the accuracy of eligibility determinations through the verification process. Additional information including the F/R application packet, Direct Certification (DC) guidance, notification letters, training webcasts, and user manuals, are found in the [Free and Reduced Meal Eligibility](#) section of the School Nutrition Website.

Eligibility Determination for RCCIs With Non-Day Students

An RCCI with non-day students must certify students for meal benefits using the following guidance and documentation to demonstrate eligibility.

Eligibility Documentation

An RCCI with non-day students have frequent, often daily fluctuations of enrolled students. Because of this, it is challenging to maintain an accurate Benefit Issuance (BI) list/Eligibility Documentation (ED) list. Students placed in an RCCI with non-day students are eligible for free meals because they do not earn, receive, or retain money while in care and most students are wards of the court and placed at the facility. Due to these factors, the WI DPI School Nutrition Team (SNT) will accept the following documentation for eligibility:

- An RCCI must have a statement on file indicating why students qualify for free meals such as, “All students are wards of the court and placed at this facility. They do not earn, receive, or retain any money while in our care.”
- A current attendance record can be used in place of a BI list/ED list.

Student Income

If a student is receiving income from trust funds, social security benefits, military allotments, or regular earnings from employment, F/R meal application must be on file. The RCCI may complete a F/R meal application on behalf of the student if necessary. The RCCI designated official may sign the F/R meal application as the adult household member for the student. Note: Payments from any source received by an RCCI on child’s behalf are not considered as income to the child.

Students Receiving Meals Offsite

If a student is residing at an RCCI but attending and receiving meals at an offsite school participating in USDA Child Nutrition Programs, the attending school's designated official may complete an application on the student's behalf based on income information known to the official. A student residing in an RCCI is considered a household of one, and the application is not subject to verification.

Eligibility Determination for RCCI With Day Students

An RCCI with day students must certify students for meal benefits using the following guidance and documentation to demonstrate eligibility.

Pricing RCCIs

If the RCCI is charging day students for meals (pricing), they must distribute household applications, conduct DC, and maintain a BI/ED list for all day students. If the household of a day student does not return a F/R meal application or the student cannot be directly certified, the student is not eligible for free meals and must be claimed in the paid category on the monthly reimbursement claim.

The following types of child income should be reported on the F/R application.

- Trust funds
- Social security death benefits or military allotments
- Regular earnings from employment

RCCIs with day students, using the pricing option, are required to conduct a full enrollment DC run a minimum of three times per year:

- First Run at or near the beginning of the school year (July – August).
- Second Run three months after the first run (October – December).
- Third Run six months after the first run (January – March).

An RCCI is encouraged to run DC when new students enroll at the RCCI.

Non-Pricing RCCIs

If the RCCI does not charge day students for meals and claims every student in the paid category (non-pricing), they do not need to obtain eligibility documentation such as meal applications and DC. However, obtaining eligibility documentation may allow for students to be claimed in the free or reduced category resulting in more reimbursement.

If an RCCI has temporary day students enrolled in a public or charter school, the RCCI may claim meals based on the F/R price determination supplied by that school or district.

Verification

RCCIs that do not determine eligibility through free and reduced-price applications are exempt from the verification requirement. However, the Verification Collection Report (VCR) must still be submitted.

RCCIs who determine eligibility through free and reduced-price applications must annually complete the verification process. The verification pool should include all F/R meal applications on file as of October 1. The verification process must be completed by November 15.

The VCR is required to be submitted by all RCCIs by February 1 each year. Additional information, including instructions for submitting the VCR, letter templates, and training webcasts are found in the Verification section of the School Nutrition Website.

COUNTING AND CLAIMING

Meals are counted at the point in the food service operation where it can be accurately determined that a reimbursable meal has been served to an eligible student. Claims are submitted to DPI each month for each participating program.

Additional information, including manual edit check forms, a training webcast and user manual are found in the [Claiming](#) section of the DPI School Nutrition website.

Point of Service Records

RCCIs can use an electronic system or manual counting procedures to count meals at the point of service. If using a manual check off sheet, we recommend using the following participation records for counting meals which include an edit check.

- RCCIs without day students and RCCIs with day students that are non-pricing and not obtaining eligibility information can use a [Daily Participation Record/Edit Check](#)
- RCCIs that establish eligibility through application or DC use a [Monthly Edit Check form](#)

Meal count systems that are not acceptable include:

- Attendance counts or pre-meal counts: counts taken prior to meal service are important for production purposes but do not provide an accurate count of meals served.
- Tray or entree counts: tray or entrée counts do not ensure all required components were on the tray, trays were not stuck together, or that each entrée was part of a reimbursable meal.

Claiming

An RCCI may participate in the NSLP and the SBP on all days of the month where students are attending and receiving meals, including weekends.

RCCIs without day students claim all students in the free category for each participating program.

Pricing RCCIs with day students that have eligibility information through DC, application, or other source eligibility, claim students in their prospective free, reduced price, or paid categories.

Non-pricing RCCIs with day students claim all students in the paid category.

Edit Checks

RCCIs without day students may use a simplified edit check by ensuring that the daily counts do not exceed the highest number of enrolled students that month. We recommend using the [Daily Participation Record/Edit Check](#) for Sites for counting meals which has a built-in edit check.

RCCIs that establish eligibility through application or DC, must complete a traditional edit check using an attendance factor and verify daily counts do not exceed the attendance-adjusted eligible counts. We recommend using the [Monthly Edit Check form](#) for counting meals which has a built-in edit check.

Severe Need Breakfast

RCCIs qualify for Severe Need Breakfast if 40% or more of the student lunches served in the second preceding school year were claimed in the free or reduced-price categories.

Age Limit

The age limit for claiming meals in the NSLP and SBP for students enrolled in an RCCI is 21 years of age.

Longer School Weeks/Continuous School Calendar

RCCIs may be reimbursed for meals served on weekends if these meals meet the meal pattern requirements. RCCIs may operate on a continuous school calendar, if school is in session, from July 1 to June 30.

Withholding Food for Punishment

Students who would normally participate in any USDA meals programs, but were moved to isolation, should be provided with a reimbursable meal/snack. The RCCI would include the student in the meal count if she/he took a reimbursable meal during service time while in isolation. Excluding these students would be considered 'withholding food for punishment' and is unallowable in the USDA Child Nutrition Programs.

Meals Served to RCCI Staff

RCCI staff that are assisting with the operation of the meal program may receive one meal at no charge. This includes staff that prepare and serve meals, perform the counting and claiming, and supervise the meal service. Staff meals cannot be claimed for reimbursement.

If RCCI staff that are not directly involved in the operation of the meal program receive a meal at no charge, the RCCI nonprofit food service account (NPFSA) must be reimbursed for the full cost of the meal (adult meal price) from another fund.

FINANCIAL MANAGEMENT

Managing finances is important for school food service operation success. RCCIs must comply with state and federal regulations related to resource management, procurement, and allowable costs. The purpose of the nonprofit food service account (NPFSA) is to operate and improve a school meals program that serves nutritious and appealing meals and meets meal pattern requirements. Additional information, including reimbursement rates, allowable costs, budgeting tools, report instructions, and training webcasts are found in the [Financial Management](#) section of the School Nutrition Website.

Reimbursement

Annually, after July 1, the USDA and the SNT release categorical meal, milk, and snack reimbursement rates. RCCIs can use these rates to budget the amount of federal revenue earned per meal.

Nonprofit Food Service Account

Program regulations at 7 CFR 210.14 and 220.13(i) require an RCCI to establish a NPFSA, in which all reimbursements and other revenues from food service operations are retained and used only for the operation or improvement of the USDA Child Nutrition Programs.

The financial management for many RCCIs is often overseen by a county or state agency. The RCCI does not need a separate bank account for the NPFSA. However, the NPFSA must have a separate accounting ledger showing the following: Beginning Fund Balance + Revenues – Expenses = Ending Fund Balance.

Annual Financial Report (AFR)

Revenues and expenses must be allocated for each participating program. This may include the NSLP Program, SBP, and ASP.

Revenue

- Federal reimbursements are revenue for each participating child nutrition program. RCCIs do not qualify for state reimbursement.
- All operating transfers into the NPFSA must be recorded on the AFR.
- Non-program foods revenue is generated from items sold outside of a reimbursable meal. Most RCCIs do not have revenue or expenses for nonprogram foods since they do not sell a la carte, second meals, or

catering. Suppers and staff meals would not be classified as nonprogram foods since they are not typically sold at an RCCI, as defined under 7 CFR 210.14(f).

Expenditures

- Labor expenditures is labor associated with the USDA child nutrition programs. RCCI staff can determine what percentage of time is spent on tasks related to each USDA child nutrition program by completing a time study. The time study needs to be updated yearly.
- Food expenditures is the number of meals served multiplied by the contracted meal price OR per meal cost.
 - If the RCCI has a vended meal or a food service management company (FSMC) agreement, the entire per meal price on the agreement/contract can be allocated to food.
 - If self-operating, the per meal cost can be determined by using the 'Menu Raw Food Costing Tool' found on the SNT Financial Management webpage.
- Equipment, purchased services, and other expenditures are allocated to the appropriate child nutrition program. Typically, only self-operating RCCIs have expenditures in these areas.

Ending Fund Balance

The NPFSA ledger and the AFR cannot end with a negative balance. A transfer must be made from nonfederal funds to the NPFSA to cover deficits in the USDA Child Nutrition programs. If there is a separate bank account for the NPFSA, this would be an actual transfer of funds. If the bank account is shared with the overseeing agency, this may only be an accounting ledger transfer. An RCCI could make this transfer at the end of year or throughout the year and must be recorded in the NPFSA ledger and on the AFR.

Indirect Costs

Indirect costs cannot be specifically identified with a particular program or other cost objective; therefore, Wisconsin does not allow indirect costs to be charged to the NPFSA nor use of the indirect cost rate. All food service costs must be converted to direct costs including documentation to show how the cost directly relates to the USDA Child Nutrition Program. For example, garbage fees for a building could not be charged to the NPFSA with the assumption that the food service department generates the most garbage. To use the NPFSA to pay for garbage fees, a weight study would need to be completed to show what portion of the garbage belongs to the food service department. Direct cost studies need to be repeated each year.

Simplified Accounting Method

In lieu of making a large fund transfer to a negative NPFSA, a simplified accounting method can be used.

Simplified Nonprofit Foodservice Account Ledger

This simplified method of recording in the NPFSA ledger is optional depending on the recording requirements of revenue and expenses of your organization. This simplified ledger shows expenses equal to the revenue reported. Other expenses are paid for by a different fund.

Each month:

- Record food revenue (reimbursements)
- Record food expenses
 - If Vended Meal or FSMC Agreement - number of meals received multiplied by per meal cost in FSMC contract = Total Food Expense
 - If Self-Operating - number of meals prepared multiplied by per meal cost = Total Food Expense

If revenue exceeds expenses:

- Record the monthly labor amount that you wish to charge to the food service account

- allocate a particular employee's labor for the amount that brings the food service balance to \$0.00. The employee's remaining labor is paid for by another fund. To Calculate: Total School Food Revenue minus Food Expenditures = amount of total labor expense needed to bring the account to \$0.00

If expenses exceed revenue:

- A fund transfer from another account will be required to cover the deficit. This transfer can be done monthly or at the end of the year.

Simplified Annual Financial Report (AFR)

This simplified method of completing the AFR is optional depending on the recording requirements of revenue and expenses of your organization. The AFR reports total food service revenues and expenditures for July 1 through June 30 (the school fiscal year). The simplified AFR reports expenses equal to the revenue reported. Other expenses are paid for by a different fund.

- Claim Date: Year selected is the end of the reporting year. For example, 2020-2021 school year, select 2021.
- Beginning Fund Balance: Beginning fund balance must be the same as the ending fund balance from the previous year. For most RCCIs this should be \$0.00

Revenue

Calculate Food Revenue

- School Food Revenue is the number of meals claimed multiplied by federal reimbursement.
- Enter revenue for each program under School Food Revenue.
- Most RCCIs do not have Non-Program Foods.

Expenditures

Calculate Food Expenditures

- If the RCCI has a vended Meal or FSMC agreement the entire per meal price on the agreement/contract can be allocated to food.
- If self-operating, the per meal cost can be determined by using the 'Menu Raw Food Costing Tool' found on the SNT Financial Management webpage.

Next, determine if revenue exceeds expenses or if expenses exceed revenue.

If Revenue Exceeds Expenses:

Calculate Labor Expenditures

- You will allocate a particular employee's labor for the amount that brings the food service balance to \$0.00. The employee's remaining labor is paid for by another fund.
- To Calculate take Total School Food Revenue (for all programs) minus Food Expenditures (for all programs) to equal the amount of total labor expense needed to bring the account to \$0.00. Allocate half of the labor amount to NSL and half the amount to SBP. For example: \$26,250.00 (food revenue) minus \$24,000 (food expense) minus \$2250.00 (labor) = \$0.00.

If Expenses Exceed Revenue

- A fund transfer to the NPFSA will be required to cover the deficit.
- This ledger transfer can be done monthly or at the end of the year.

- This is recorded under Revenue-Transfer from nonfood service account operating transfer. This should be divided evenly between breakfast and lunch.

Ending Fund Balance Summary

- This information will be populated from what has been entered into the report.

Certify and Submit

To submit the AFR, enter your contact information and click Submit.

GENERAL PROGRAM REQUIREMENTS

This section includes guidance on the general rules and regulations associated with the USDA Child Nutrition Programs.

Civil Rights

All RCCIs participating in the USDA Child Nutrition Programs must comply with Federal civil rights requirements to ensure that benefits are provided in a nondiscriminatory manner. Additional information, including report and policy templates, nondiscrimination statement guidance, And Justice For All poster guidance, and training webcasts are found in the [Civil Rights](#) section of the DPI School Nutrition website.

And Justice for All poster

The USDA *And Justice for All* poster must be placed in a public location wherever meals or snacks are served. If meals are delivered to participants in a cell, the poster can be attached to the cart delivering the meals if the poster can be observed from the cell. Alternatively, the poster could be posted in a common area or intake area if necessary for safety reasons.

Civil Rights Training

USDA civil rights training is required on an annual basis for all who interact with the Child Nutrition Program participants. Each RCCI must also maintain documentation of the training and an attendance record of participants that attended.

Civil Rights Training is available in two formats: a PowerPoint presentation or a Webcast.

Complaint Policy

All RCCIs must have procedures for receiving, processing, and documenting complaints alleging civil rights discrimination within the USDA Child Nutrition Programs. DPI has created [Template Civil Rights Complaint Procedures](#) as a guide when developing the policy.

Limited English Proficiency

RCCIs have a responsibility to take reasonable steps to ensure access to the child nutrition programs by those with Limited English Proficiency (LEP). Persons with LEP are individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English. Eligibility materials and resources in Spanish and Hmong are available in the [F/R Meal Eligibility](#) section of the DPI School Nutrition website. Additionally, the USDA has [eligibility resources](#) available in many more languages.

Nondiscrimination Statement

Materials and resources, including websites, which are used to inform the public about the USDA Child Nutrition Programs must contain the current USDA nondiscrimination statement (NDS).

The full version of the USDA Nondiscrimination Statement must be included on USDA Child Nutrition Program materials including handbooks, websites, employee handbooks, and intake forms that contain information about

the USDA Child Nutrition Programs. For other languages visit the [USDA FNS Nondiscrimination](#) webpage. The shortened version of the NDS “*This institution is an equal opportunity provider*” may be used in limited circumstances such as menus, flyers, brochures, etc.

Public Release

RCCIs without day students are exempt from the public release requirement. RCCIs with day students who determine eligibility through F/R meal applications, must annually provide the public release to a variety of community organizations at the beginning of the school year to inform potentially eligible persons that your school or agency participates in the Child Nutrition Programs and includes information pertaining to eligibility, benefits and services and the steps needed to participate. Maintain documentation of where the public release was sent.

Separation of Gender

An RCCI may request an exemption for Prohibition of Separation by Gender during child nutrition program meal service if combining members of the opposite gender would present a safety risk.

Special Dietary Needs

RCCIs operating the USDA Child Nutrition Programs are required to make modifications to accommodate students with disabilities. This includes providing special meals, at no extra charge, to students with a disability which restricts their diet. Additional information, including guidance on providing carbohydrate and other nutrition information, managing food allergies toolkit, and training webcasts are found in the [Special Dietary Needs](#) section of the School Nutrition website.

DPI SNT recommends using the [Medical Statement](#) on the DPI website but at a minimum an authorized medical statement must include:

1. an explanation of how the child’s physical or mental impairment restricts the child’s diet
2. the food(s) to be avoided
3. the food or choice of foods that must be substituted
4. The statement must be signed by a licensed medical practitioner, which is a health care provider that can write a prescription in the state of WI.

RCCIs may offer students a fluid milk substitute that is nutritionally equivalent to cow’s milk without a signed medical statement. An RCCI may choose to offer lactose free dairy milk with no prior approval. To provide a fluid milk substitute such as soymilk, prior approval must be obtained from the DPI SNT by completing this form:

- [List of Allowable Fluid Milk Substitutes](#)
- [Fluid Milk Substitute Approval Form](#)

Food Safety

RCCIs participating in the USDA Child Nutrition Programs must agree to maintain necessary facilities for storing, preparing, and serving food and to comply with health standards required by applicable state agency and/or local laws and codes. The RCCI should work with the local sanitarian to determine site specific acceptable standards including a process for time and temperature monitoring.

Additional information, including standard operating procedure templates, temperature logs, food waste/donations guidance, and training webcasts, are found in the [Food Safety](#) section of the DPI School Nutrition website.

Food safety requirements

There are four food safety requirements specified by USDA for participation in the USDA Child Nutrition Programs:

1. Request two food safety inspections (each school year) from the state or local governmental agency responsible for food safety inspections.
2. Publicly post the most recent food safety inspection in a location that is visible to the public to the extent practicable, such as a visiting room and make a copy of the inspection report available upon request.
3. Implement a food safety plan based on Hazard Analysis Critical Control Point (HACCP) principles. This plan must contain site-specific standard operating procedures for any area where food is stored, prepared, or served for the purposes of the USDA meals programs.
4. Report on the School Nutrition Contract, the number of food safety inspections received at each site.

Food Safety Inspections

USDA memo SP 45-2011 states that all food preparation-service sites and service-only sites are required to be inspected. In addition, USDA memo SP 05-2008 states that RCCIs must obtain two food safety inspections from their State/local public health agency even if they only offer vended meals or if residents prepare and serve their own meals. The State/local public health agency has discretion to determine the extent of the food safety inspections. If the RCCI is part of another institution, the inspections obtained by the larger facility count towards the NSLP requirement if the RCCI food preparation and/or service area is included in the regular inspection.

Local Wellness Policy (LWP)

RCCIs participating in the USDA Child Nutrition Programs are required to establish a wellness policy. Even though an RCCI may have different circumstances and wellness goals than a traditional school, the wellness policy should meet all USDA requirements to the extent safe and practicable to help ensure the health and development of participants. Additional information, including a LWP Checklist, a LWP Policy Builder, and wellness resources are found in the [Local Wellness Policy](#) section of the DPI School Nutrition website.

Public Involvement

The intent of the public notification requirement of the LWP is to inform the public about the process and how they can be involved in development, implementation, reviews, and assessments. An RCCI is not exempt from the public notification requirement; however, the RCCI has the discretion to determine to whom this public notification should be directed.

Policy Requirements

The [Local Wellness Policy Checklist](#) is a resource that will help ensure all required areas are included in their LWP. Below are some examples of language that could be used in the more challenging areas of an RCCI LWP:

- **Public Involvement:** *The RCCI will invite a diverse group of stakeholders to participate in the development, implementation, and review of the policy. Stakeholders may include an administrator, a parent, a community representative, nurse, detention staff, and treatment staff.*
- **Food and Beverage Marketing:** *The RCCI will restrict food and beverage marketing to only those foods and beverages that meet the nutrition standards set forth by USDA's Nutrition Standards for All Foods Sold in Schools rule (Smart Snacks).*
- **Nutrition Promotion:** *The RCCI will promote healthy food and beverage choices for all participants by ensuring 100% of foods and beverages promoted to students meet the USDA Smart Snacks in School nutrition standards.*
- **Nutrition Education:** *All residents will receive instruction on meal planning, food safety, and food preparation techniques as part of their life skills education.*
- **Physical Activity:** *The RCCI will provide opportunities for participants to participate in physical activity to the extent safe and practicable.*
- **Other School Based Strategies:** *The RCCI will offer one staff wellness event each year.*
- **Inform the Public:** *The RCCI will notify parents, facility staff, residents, and other stakeholders regarding the content of the wellness policy, updates to the policy, and results of the policy assessment by posting information in a public place such as a visiting room or intake packet.*

Onsite Monitoring

On-site monitoring is required for all RCCIs participating in the USDA Child Nutrition Programs with more than one meal site to help ensure program integrity and accountability. Additional information, including onsite monitoring forms for the NSLP, SBP, and ASP are found in the [Onsite Monitoring](#) section of the DPI School Nutrition website.

School Breakfast Program (SBP)

A monitoring visit is required for 50% of the sites serving the SBP with the other 50% to be monitored in alternating years, by February 1 each year.

National School Lunch Program

A monitoring visit is required for all sites serving the NSLP by February 1 each year.

Professional Standards

All employees who manage and operate the USDA Child Nutrition Programs must meet USDA professional standards which include hiring standards and annual training requirements. Additional information, including hiring standards guidance, training trackers, and a training checklist are found in the [Professional Standards](#) section of the DPI School Nutrition website.

Hiring Standards

The person designated as the Food Service Director is required to meet minimum education and food service experience standards for their salary to be an allowable school food service expense. In addition, new Food Service Directors are required to complete 8 hours of food safety training.

Food Service Directors whose salary is not paid from the Federal NPFSA, as well as those hired prior to July 1, 2015, are exempt from the Hiring Standards requirement.

Annual Training

All employees who manage and operate the USDA Child Nutrition Programs must complete annual continuing education training. The required hours are based on the employee's role and hours worked.

Annual Training Requirements:

- Food Service Directors: 12 hours
- Managers: 10 hours
- Staff who work in school nutrition more than 20 hours per week: 6 hours
- Staff who work in school nutrition less than 20 hours per week: 4 hours

Training Tracker

RCCIs must monitor and record annual continuing education training. The following tools have been created by the USDA and WI-DPI to help with tracking training hours.

- [USDA Professional Standards Tracking Tool Version 2.0](#)
- [DPI-developed Professional Standards Tracking Tool](#)

RCCIs may also use their own training tracker such as an Excel Spreadsheet. A training tracker much include an employee's:

- Name and position/role
- Date of hire
- Required hours of training
- Training title and provider
- Training hours completed

Outreach

Outreach is required to inform families of the availability of breakfast and summer meals. Based on the nature of most RCCIs meals are required to be provided and do not need to be promoted. Therefore, outreach is often not practical or necessary. However, because outreach can be beneficial for families, WI DPI SNT recommends RCCIs consider the following ways to conduct outreach:

School Breakfast Program

RCCIs can inform families of breakfast by adding a statement to their intake packet and/or website such as, “This Residential Care Facility participates in the USDA School Breakfast Program and the National School Lunch Program.”

Summer Food Service Program (SFSP)

RCCIs can inform students and families of SFSP locations by providing the following information in their intake packet and/or website:

- the [summer meals locator](#) on the DPI Summer Meals webpage
- call 211 to locate meals in the area
- text ‘food’ to 304-304 to locate meals in the area

Reporting

RCCIs participating in the USDA Child Nutrition Programs must agree to submit monthly claims for reimbursement along with reports and other information as required by USDA and DPI. Additional information, including due dates, report instructions, and training webcasts are found in the [Reporting](#) section of the DPI School Nutrition website.

All RCCIs must complete the following reports:

- School Nutrition Contract along with the vended meals agreement or memorandum of understanding (MOU).
- Food Service Annual Financial Report – Submit by August 31
- Civil Rights Compliance-PI-1441 – Complete by November 1 and keep on file (do not submit)
- FNS-10 Report – Submit by November 1
- FNS-828 Paid Lunch Price Report – Submit by November 1
- FNS-752 Verification Collection Report – Submit by February 1

Records Retention

RCCIs participating in the USDA Child Nutrition Programs must keep all documents and records associated with the Child Nutrition Program for 3 years plus the current year.

Water Availability

RCCIs participating in the National School Lunch Program (NSLP), or School Breakfast Program (SBP) are required to make water available to students, without restriction and at no charge, in the place where meals are served or immediately adjacent to the meal service area.

OTHER PROGRAMS

Afterschool Snack Program

An RCCI that participates in the NSLP may participate in the ASP. Additional information, including meal pattern guidance, production record templates, point of service templates, monitoring forms, and training webcasts are found in the [Afterschool Snack Program](#) section of the DPI School Nutrition website.

To be eligible for reimbursement under the ASP, the program must:

- Have at least one afterschool enrichment activity which must be open to all students at the site operating the ASP.
- Operate only after the school day has ended. Snacks cannot be reimbursed in programs operated before or during the school day.
- Operate the program only on days school is in session. Snacks are not reimbursable on weekends, holidays, or during school vacations.

Area Eligible Afterschool Snack Program

In an Area Eligible ASP, all students participating in afterschool enrichment activities are provided with a free snack and are claimed in the free eligibility category when a reimbursable snack is selected.

RCCIs without day students automatically qualify for the Area Eligible ASP.

RCCIs with day students must meet area eligibility requirements to qualify for the Area Eligible ASP. An RCCI site is area eligible if at least 50 percent of the enrolled students are eligible for free or reduced-price meals. For RCCIs that do not qualify for the Area Eligible ASP, snacks are claimed by the free, reduced price, and paid eligibility categories.

Afterschool Snack Program Monitoring

The ASP requires two monitoring visits each year, regardless of the number of sites, with the first observation taking place within the first four weeks.

Special Milk Program

The SMP provides milk to students in pre-kindergarten through grade twelve that do not have access to other Federal child nutrition meal service programs (i.e., NSLP and SBP). Additional information, including participation requirements and pricing options are found in the [Special Milk Program](#) section of the DPI School Nutrition website.

Wisconsin School Day Milk Program

The WSDMP reimburses schools and RCCIs for a portion of their costs for serving milk at a milk break to Pre-Kindergarten through Grade 5 students. Additional information, including the WSDMP application, point of service documents, claim instructions, and a training webcast are found on the [Wisconsin School Day Milk Program](#) section of the DPI School Nutrition website.

RCCIs without day students, who participate in the WSDMP, must provide free snack milk to all Pre-Kindergarten through Grade 5 students.

RCCIs with day students, who participate in the WSDMP, can provide free milk only to students who qualify for free or reduced-price meals. Milk served to students with a paid eligibility status is not eligible for reimbursement. If students with a paid eligibility status are not charged for the full cost of milk, a transfer from non-federal funds must be made to the food service account.

MEAL PATTERN AND NUTRITIONAL QUALITY

This section includes guidance on the general rules and regulations associated with [Menu Planning](#) in USDA Child Nutrition Programs.

Meal Pattern Requirements

RCCIs are required to follow certain meal pattern requirements based on the age/grade group of the student served. There are different weekly requirements based on the number of days your institution serves meals per week. Select from the options below.

- 5 Day: [Lunch](#), [Breakfast](#)
- 6 Day: [Lunch](#), [Breakfast](#)
- 7 Day: [Lunch](#), [Breakfast](#)

Meal Pattern Waivers

Due to the unique service style and needs of RCCIs, the following waivers are available to assist with meal service. To apply for these waivers your institution must meet the following criteria:

1. Is a juvenile detention or correctional facility
2. Have a legitimate safety concern or State juvenile justice laws or regulations related to offering meals with varying amounts of food within the same meal period:

Meal Pattern Flexibility

Allows the RCCI to offer the same meal pattern to all students regardless of their age/grade group. If approved, the RCCI must follow the meal pattern for the highest age/grade group served.

Milk Variety Flexibility

Allows the RCCI to offer a variety of milk over the course of the week rather than having to offer a variety of milk at each meal service. For example, instead of offering a choice between fat-free chocolate and 1% white milk at each meal service, you may instead choose to offer only white milk at each meal during the week and chocolate milk at each meal on the weekends. The RCCI may decide what will work best for their program.

Offer Versus Serve Flexibility

Allows the RCCI to waive the [Offer Versus Serve](#) requirement for students in grades 9-12. If approved, all five required components in their daily minimum amounts must be served to each student.

To request any or all of the above mentioned flexibilities, please complete the [Meal Pattern Flexibility form](#).

Meal Service

RCCI are encouraged to give students sufficient time for meals and an atmosphere that maximizes nutritional and social benefits of shared meals.

Family Style Meal Service

RCCIs may serve meals family style. To claim these meals for reimbursement, RCCIs must meet the following conditions:

- Provide enough food so that each student has access to the daily minimum amounts for each component as listed in the meal pattern tables. Additionally, include servings for the supervising adult(s) if they choose to eat with the students.
- Each student must be offered the full required minimum portion of each component.
- If the student does not take the entire minimum required portion size, the supervising adult(s) should encourage them to take the required portion size of the item during the meal. For a meal to be reimbursable, the meal must contain the required portion sizes of the required components.
- The RCCI cannot force or require the student to take any of the meal items.

The meal is reimbursable if the conditions above are met.

Signage

RCCIs must display [Signage](#), visible to students, that identifies the components of the reimbursable meal. If Offer vs. Serve is utilized, signage must indicate how a reimbursable meal is assembled

- At lunch, students must select at least three full, different, food components, one of which is a ½ cup fruit and/or vegetable.
- At breakfast, students must select at least three food items, one of which is a ½ cup of fruit and/or vegetable.

Smart Snacks

All food and/or beverages sold to students during the school day must comply with [Smart Snacks Nutritional Guidelines](#). The school day is considered midnight of the instructional day until 30 minutes after the end of the school day. A school day may look different at each RCCI depending on the structure of the day or how education is provided. The “school day” may be personalized from student to student depending upon their personal schedule and needs. For example, some RCCIs have a shortened school day based on individual student needs. For ease of operation and compliance, it may be best to define an end time that would apply to all residents.

Canteen or commissary is sometimes available to students for purchase- foods often do not meet Smart Snacks standards. Ensure that purchases are made/delivered after the school day and not allowed to be consumed during the school day.

Claiming for Reimbursement

For a meal to be claimed for reimbursement, the student must select a reimbursable meal. Meals can be claimed regardless of whether the student eats the meal.

Facilities Not Using Offer vs Serve

- At breakfast, the student must select all three required components in the daily minimum amounts (1 oz eq grain, 1 cup fruit, 1 cup fluid milk).
- At lunch, the student must select all five required components (fruit, vegetable, grains, meat/meat alternate, fluid milk) in the daily minimum amounts (may vary depending on the age/grade group served).

Facilities Using Offer vs Serve

- At breakfast, the student must select at least three food items, one of which is a ½ cup of fruit and/or vegetable.
- At lunch, the student must select at least three full, different, food components, one of which is a ½ cup fruit and/or vegetable.