



# CSI School Food Authority Handbook

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## **CSI School Food Authority Overview**

### **Child Nutrition Programs Handbook**

The Charter School Institute (CSI) School Food Authority has put together this handbook to transparently communicate the regulations, requirements, and standards that CDE and CSI set forth for the National School Lunch Program and School Breakfast Program. The majority of this handbook came from the CDE Administrators Reference Manual as well as other CDE Child Nutrition Publications, which can be found online at: <http://www.cde.state.co.us/nutrition>

Each staff member involved with the Child Nutrition Program at each school is to read and review the handbook. The Head of School and School Nutrition Contact will sign the MOU that they understand and assume the division of responsibility for the Child Nutrition Programs your school is operating.

## Meal Benefit Applications and FEDS Forms

Beginning July 1st each year, the Meal Benefit Applications and FEDS Forms become available for households to apply. Students may be eligible for free or reduced meals through the process of Direct Certification, or if the household submits an online application. Paper applications will be available on an as needed basis. CSI processes all Meal Benefit Applications and FEDS Forms for schools operating a nutrition program. Students are not eligible to receive free or reduced priced meal benefits until the application has been processed. The date that the application is processed will be the effective date of eligibility. Beginning in 2023-2024 and expanding to 2025-2026, CSI Schools will be participating in Healthy School Meals for All (HSMA), which allow all students to receive a free meal regardless of their Free or Reduced status. HSMA is subject to change based on legislative action. During the first 30 days of the school year their previous year F/R status will carry over to the new school year, if they are a returning student at the same school, or same school network.

### **Meal Benefit Application/ FEDS Form Process**

CSI will develop and release the meal benefit application/FEDS Form also known as a combo form for the new school year on July 1st. This is after USDA and CDE release the requirements for the new school year's application form. A letter to the household provided by CSI that explains the application process must be sent to all parents at your school. This is part of the online application but if a family needs a paper form the letter to the household needs to be included. CSI can only accept applications for the specific school year. Previous years unused meal benefit applications/ FEDS Forms should be discarded at the end of the year to eliminate confusion.

The school staff receiving paper applications should do their best to see that applications are returned completed (please see guidelines for a complete application below in Recognizing a Complete Application). Online applications will be submitted directly to CSI and will be processed faster. The school should not delay entering applications into Primero Edge and keeping the paper applications in a locked drawer for 7 years. Upon receipt, CSI is required to process all applications within 10 business days. CSI will then send a confirmation letter to the school to share with the family if an email address is not provided in the application for the letter to be emailed. Households should be advised that they cannot assume they are receiving benefits until after they receive a confirmation letter.

### **Schools' Application Responsibilities**

- Maintain all submitted paper applications under lock and key at the school.
- Do not leave applications sitting out for other staff and parents to see.
- Ensure data on applications and eligibility statuses are only shared with authorized programs.
- Ensure all staff with access to applications and eligibility statues have signed and submitted Disclosure Agreement to CSI and completed Back to School from CSI

- Ensure parents or legal guardians who want eligibility released for specific programs for benefits have a signed Information Release Form on file at school for the specific program.

### **CSI's Application Responsibilities**

- Maintain information on a secure server or cloud.
- Ensure data on meal benefit applications and eligibility statutes are only shared with authorized programs.
- Provide and maintain Disclosure Agreements for Charter Schools and CSI staff.
- Process applications within 10 business days.
- Run Direct Certification process to extend benefits to eligible students.
- Provide support to families when filing out meal applications and inquiring about FRL status.

### **Recognizing a Complete Application**

If a family completes a paper application, it is important to recognize missing information before the household submits the application to expedite receiving benefits. CSI will be providing schools with a list of incomplete applications as needed for schools to follow up with households. The fastest way to complete meal benefit applications without errors is to encourage families to fill out the online application which can be found on their parent portal via Primero Edge.

### **Income Eligibility**

A complete application must provide:

- Names of all household members
- Amount and source of income for each member and the frequency of income.
- Signature of an adult household member
- The last four digits of the social security number of the adult household member who signs the application or an indication that the household member does not have one (only for schools not on CEP)

### **Assistance Programs**

A complete application must provide:

- Names of the children for whom the application is made.
- SNAP or FDPIR case number, or other FDPIR identifier, for the child(ren) or for any household member listed on the application (SNAP number starts with 1B)
- Signature of an adult household member

### **Other Source Categorical Eligibility (Except Foster Children)**

A complete application must provide:

- Names of the children for whom the application is made.



- Indication of child's categorical eligibility status (a box for each category is shown on the prototype application and households must check the appropriate one)
- Signature of adult household member

### **Other Source Categorical Eligibility for Foster Children**

A complete application must provide:

- Name of the foster child
- Checked box indicating a child's foster care status.
- Signature of an adult household member

### **Direct Certification**

Direct Certification means determining children eligible for free meals benefits based on documentation obtained directly from the appropriate State or local agency or another authorized individual. In most situations, direct certification of a child's eligibility status should not involve the household. The communication exchange should be between an appropriate agency and the LEA/school.

CSI performs the direct certification process at specified times during the year according to CDE, beginning in August. If a student is determined free by direct certification, the household will be notified with a letter, and the family does not need to complete an application. Direct certification is student specific during the process; however, students living in the same household are to receive the same benefits. If the parents or school staff realizes students are receiving different benefits in the same household, households can submit written notice of the students to extend benefits. The Extended Eligibility Form in both English and Spanish can be used to notify CSI to extend benefits.

### **Homeless, Migrant, or Runaway**

The CSI application includes a section for households to select homeless, migrant, or runaway. CSI staff will confirm the eligibility for these classifications.

Paperwork becomes effective from the time the Homeless Liaison signs the form, not the time the Head of School signs. CSI Nutrition staff will then process any changes to the students' account to reflect new statuses.

### **Maintaining Confidentiality**

Overt identification is any action that may result in a child being recognized as potentially eligible to receive or certified for free or reduced-price school meals or free milk. SFAs must assure that a child's eligibility status is not disclosed at any point in the process of providing free or reduced-price meals, including notification of the availability of free or reduced-price benefits; certification and notification of eligibility; provision of meals in the cafeteria; the point of service; and through the method of payment.

SFAs and schools must avoid any policy or practice that has the effect of overtly identifying eligible children. LEAs must ensure that their policy statement complies with this guidance.



State agencies must ensure during an administrative review as part of the general areas that an LEA's policy statement addresses ways to prevent overt identification.

Information collected on the Meal Benefit Application/Feds Form as well as the Student Status MUST be kept confidential. Maintaining this confidentiality includes CSI maintaining secure servers and keeping applications under lock and key. This information MUST only be disclosed to authorized programs.

### **Programs authorized to collect information without signed information release forms.**

- Title I, Part A Allocation and Evaluation
- National Assessment of Educational Progress
- On behalf of the U.S. Department of Education's Office of Educational Research and Improvement
- October 1 Pupil Count, Including End of Year Count Report
- GearUp – Governor's program
- Colorado Student Assessment Program (TSAP, to include the COACT)
- Colorado Student Assessment Program – Alternate (CSAP-A)
- Transitional Colorado Assessment Program (TCAP)
- Colorado English Language Assessment (WIDA)
- WIC, CACFP, SFSP
- Comptroller General of the United States for auditing purposes

### **Disclosure Agreements**

To ensure that all staff with access to meal benefit application/FEDS Forms and eligibility statuses shares information with only authorized programs, CSI requires that managers, cashiers, and any other staff with access to the Primer Edge point-of-sale system, meal benefit applications or access to the School Information System (i.e., Power School or Infinite Campus) MUST sign a CSI Disclosure Agreement for the current school year. These complete forms must be signed and submitted to CSI.

CSI reserves the right to lock any school failing to submit these forms by the deadline listed under "Submitting Documentation to CSI" from the point-of-sale system. This would inhibit meals from being counted for reimbursement and no retroactive reimbursement will be accepted before the signed agreement is on file. Any changes in staffing must be communicated, and a disclosure agreement must be submitted to the CSI School Nutrition Manager.

### **Information Release Form**

The Information Release Forms are available for parents to choose to release their eligibility information. The Program name must be descriptive and fully identify to a parent the reason for release of student's eligibility status. Generic terms such as "other" or "fee waiver" are not acceptable. Parents do not need to sign if they provide a copy of their status letter. When this form is signed by a parent or legal guardian, the child's eligibility status may be released to specified school related/education programs for benefits, such as the waiving of fees for athletic activities or reduced fees, etc.

A school may choose to offer these forms for in-house purposes. The school must maintain all forms and make them available for review upon CSI request. Please do not include these forms when sending in student applications to CSI. These forms should NOT be attached to the application and distributed to parents.

### **Consequences for Releasing Information**

- \$1,000 fine
- Up to 1 year in prison
- Or both

### **Verification Process**

Verification is confirmation of eligibility for free and reduced priced meals under the NSLP and SBP. Verification is only required when eligibility is determined through the application process, not through direct certification conducted with an Assistance Program or officials or agencies that documented Other Source Categorical Eligibility.

Verification must include either confirmation of:

- Income eligibility
- Confirmation that the child or any member of the household is receiving assistance under SNAP or FDPIR
- Child is Other Source Categorically Eligible

CSI must annually verify the eligibility of children from a sample of household applications approved for free and reduced-price meal benefits for that school year. CSI uses the final sample pool as the actual number of approved applications on file as of October 1st. The sample size must be based on the October 1st sample pool. CSI must complete the verification activities specified in this section not later than November 15th of each school year.

Households will be notified upon selection and sent documentation which must be completed and returned to CSI. CSI will release a confidential list of the households selected to the nutrition contact, at each school, who has completed and submitted a nondisclosure agreement once the sample pool has been finalized, along with the same forms that the households must fill out in order to complete the verification process. The school is not responsible for the verification process, but households may have questions.

Documentation must be submitted to CSI before November 15th in order to not affect the households' benefits. Any documentation received after November 15th will require a new application as well as the documentation. Households are encouraged to reapply and/or submit new documentation at any time if their situation changes.

### **Verification for Cause**

CSI has an obligation to verify all questionable applications as verification "for cause".

Such verification efforts cannot delay the approval of applications. If an application is complete and indicates that the child is eligible for free or reduce price benefits, the application must be approved. Only after the determination of eligibility has been made can CSI begin the verification process.

To verify an approved application for cause, CSI must send the household a letter explaining that it must submit verification of eligibility information with the application for continued eligibility. The verification letter may be sent at the same time as a notice of eligibility.

Any household that fails to submit requested verification information by the date specified by CSI or that submits verification information that does not support the initial determination of eligibility must be sent a notice of adverse action.

Please contact [Nutrition\\_CSI@csi.state.co.us](mailto:Nutrition_CSI@csi.state.co.us) if you have reason to question the validity of an application or eligibility status.

### **Operating a computer kiosk for online applications**

CSI schools are highly encouraged to operate a computer kiosk in their school to encourage households to fill out an online application while on site. Online applications cannot be submitted as incomplete and a delay with application processing is greatly reduced. School staff who have completed Free and Reduced Training may assist parents in completing the online application.

However, in order to avoid overt identification, the computer cannot be limited to use for only applications. Items like signage around the computer cannot indicate that is used for meal benefit applications. If you are interested in operating a computer kiosk, please contact the CSI Nutrition Manager for advice and set up.

## Record Keeping Requirements

### **Submitting Documentation to CSI**

- Submitted by July 8th: ☐ Disclosure Agreement for All Staff Involved with Meal Benefit Applications
- Submit Monthly via Epicenter: (if applicable) ☐ Food Temperature Logs ☐ Equipment Temperature Logs ☐ Thermometer Calibration Logs ☐ Production Records ☐ Cleaning logs ☐ Signed Edit Check ☐ Receiving Logs
- Submit When They Occur: ☐ Health Department Inspections
- Submit by Last business day of July: ☐ Year End Food Program Financial Reporting (Submit to [DavidSever@csi.state.co.us](mailto:DavidSever@csi.state.co.us)).

Failure to submit the above documentation can result in corrective action from CSI which may include withholding reimbursement until documentation is complete and compliant, or loss of access to the Primero Edge Sale System until documentation is on file with CSI. Contact the CSI School Nutrition Director or CSI School Nutrition Specialist if you have any questions regarding submitting documentation.

### **Production Records**

During an administrative review, two methods are used to evaluate district menus with regard to meeting the minimum requirements of the school lunch pattern:

- Meals served on the day of the review are observed.
- Menus and production records for previously served meals are examined.

A complete and accurate production record must be maintained on all meals claimed for reimbursement. Production records are the only records that demonstrate that the meals served and claimed met meal pattern requirements and were thus reimbursable. Keep in mind that this requirement includes breakfasts as well as all lunches, including salad and other food bars, sack lunches, etc. Any meal claimed for reimbursement must be supported by a production record.

Completing production records is crucial to receiving and retaining reimbursement. Failure to complete any production records will result in corrective action from CSI, which could include but is not limited to not claiming meals for reimbursement that do not have compliant menus/production records.

CSI schools use a variety of production records templates in order to complete this recordkeeping requirement. These templates are decided upon based on the school's operational set up such as if a food service management company provides the production record each day or if the kitchen has its own computer system (Primero Edge) to generate them. Below are the minimum requirements specified by CDE. All production records must contain these items, and complete records have each item filled out completely.

### **CDE-Specified Minimum Requirements for Daily Production Records**

During an administrative review, two methods are used to evaluate district menus with regard to meeting the minimum requirements of the school lunch pattern:

- School Name
- Date meal is served.
- Indication of meal served (breakfast or lunch)
- Actual number of reimbursable meals (by grade levels) and adult meals obtained from the point-of-sale (POS) record or attach electronic POS report.
- List of all menu items (including condiments) that contribute to the reimbursable meal.
- Recipe number or brand name and code number of processed food.
- Portion sizes and planned number of servings of each menu item by grade levels (i.e., K-5, K-8, 6-8, 9-12)
- Number of servings planned of each menu item for adults (program and nonprogram) and a la carte.
- Total amount prepared of each menu item by pound, quantity, or number of servings.
- Total amount of leftovers for each menu item by pound, quantity, or number of servings

Schools are required to submit these records each month to CSI for review. CSI will provide feedback if these records do not meet the standard for CDE requirements. If there are questions about production records, please reach out to the CSI Director of School Nutrition or Nutrition Specialists for help. These records must be retained for three years plus the current year. Failure to complete these records prior to the claim being filed for that month can result in CSI not claiming meal reimbursements until they are complete. A history of non-compliance with requirements can result in CSI Modifying the MOU agreement at any time during the year by formal notice to the school leader, Kitchen manager, and board.

### **Standard Operating Procedure HACCP Manual**

CSI's Food Safety Standard Operating Procedures are adapted from Iowa State University's Safe Food Materials. Each school will be provided with an electronic SOP manual and is expected to print it out, read and implement the contents of the manual. A hard copy of the most recent manual must be present in the kitchen. CSI school site reviews will include a review of the SOPs to ensure compliance. Written corrective action can occur if the school is found to not be using the manual.

### **School Requirements**

- Main nutrition contact must review and implement each chapter.
- Main nutrition contact must train each nutrition employee on SOPs.
- All nutrition employees must sign and date the CSI Food Safety Manual Acknowledgement form found on the last page of the CSI HACCP Manual.
- Each school that prepares meals must have a Certified Serv Safe Food Protection Manager on site, with a back up trained if the main contact is absent.

## Receiving and Rejecting Food

### **Self-Operational Kitchens**

Kitchen staff upon receiving product must take the receiving temperature to ensure it meets the standards for food safety. If it does not, staff must reject the items.

### **Food Service Vendors and District Sites**

Sites that receive food from food service vendors and districts where the school staff serves the food must be present with the delivery staff when delivery temperatures are taken. If the delivery temperature is not within the acceptable ranges, the temperature logs for when the food left the primary location must be reviewed.

If those temperature logs are able to establish that the food left the production location at the proper holding temperature, and it is within a four-hour window from time the temperature was taken and the end of meal service then the school can accept the food.

If unable to establish the temperature of the food when it left the location or documentation does not support the proper holding temperatures, then food must be rejected, and a credit must be issued to the school.

### **Temperature and Calibration Logs**

Proper techniques for completing temperature and calibration logs are outlined in the Standard Operating Procedures Manual as well as proper sanitation and heating procedures. These records must be maintained every day and submitted to CSI for review each month.

Maintaining these records not only satisfies the Health Department requirements but protects the school's operation in case of food borne illness accusation.

Failure to maintain these records puts your operation at risk and could result in corrective action from CSI and withholding of Meal Reimbursement.

### **Point of Sale and Reimbursement**

Our Point-of-Sale System, Primero Edge, is used to determine the claims for reimbursement each month. Below is the process required of all schools in order to claim reimbursement for the National School Lunch Program and School Breakfast Program.

When a new staff member begins using the POS system it is important that they are properly trained. The staff members should review the Primero Edge training which can be found on the Primero Edge portal or provided by CSI SFA. If the school is part of CEP and can provide proof that they are not claiming a student twice they may be eligible not to use the Point of Sale at meal service but rather enter a bulk number at the end of service. Speak with the School Nutrition Director for permission to do this.

Reimbursement amounts for category and meals change each year. CSI will inform the schools of the reimbursement rate before the beginning of the school year once it is shared by CDE.

### **What is SASID?**

State Assigned Student Identification, or SASIDs, are state-assigned ID numbers which are assigned to all students who attend public school in Colorado. SASIDs are particularly important

for CSI because the Nutrition system Primero Edge pulls students using this unique data point. Local student identifiers cannot be used because one student in a school may have the same PowerSchool or Infinite Campus ID as a student in another school. The Primero Edge system would not be able to recognize two separate students with the same local identifier. SASIDs are the only unique identifier for all our schools.

### **How are SASIDs Obtained?**

New SASIDs must be obtained through CSI by completing the SASID Request Template (<https://resources.csi.state.co.us/sasid-request-template/>). Schools are expected to complete the SASID Request Template to CSI within 24 hours of knowing you need a new SASID. Please see the SASID portion of the CSI website for more information: <https://resources.csi.state.co.us/sasid-edid-requests/>.

### **When should new students be entered into the Student Information System?**

Within 24 hours of receipt, new students and their SASID should be entered into the Student Information System (e.g., PowerSchool, Infinite Campus, etc.). Entered SASIDS must be double checked for accuracy. Delay on SASIDs could cause a delay in processing applications.

### **How are SASIDs updated in Primero Edge?**

The CSI free and reduced software, and Point-of-Sale (POS) software Primero Edge communicates all student eligibility data between the systems. Each student is “matched” or “updated” in Primero Edge based on their SASID number. A student without a SASID will not be added to or updated in the Primero Edge system. Any changes made to the school’s student information system to the address, parent name, date of enrollment, primary language, etc. will be updated into Primero Edge each night.

### **Monthly Claim for Reimbursement Procedure**

Each month, your school will receive federal and state funds for each eligible student meal that is entered into Primero Edge. Reimbursement amounts are decided by the student’s eligibility categorical rate (free, reduced, and full pay).

For CSI to receive funds, a claim must be submitted to CDE each month. CSI requires that all schools submit a signed copy of their Federal Edit Check report for the month by the first of the month (or the first day of the month that is a school/business day) with a grace period of five business days. It is essential that the information submitted is verified to be accurate and correct before submitting it to CSI. Delays in submitting the Federal Edit Check result in all schools delaying in receiving their monthly reimbursements so missing the deadline three times or more will result in a formal notice of concern. The following is the process in order to submit the Federal Edit Check report to CSI:

Beginning of new month: Print Federal Edit Check from Previous Month in Primero Edge. Review federal edit check and verify for accuracy, completion, and that no dates are over the claim threshold. Investigate and fix errors, contact CSI as needed for assistance. If there are issues with monthly claims the Head of School will be notified. Sign Federal Edit Check: Main Nutrition Contact signs to certify that the information is complete, accurate, and verifiable to the best of your knowledge. Submit signed Federal Edit Check to CSI. Submit to CSI by the 5th of Every Month (If the 5th falls on a weekend, the following Monday)



## Identifying a Reimbursable Meal

### **Importance**

Reimbursement can only be claimed for reimbursable meals. In order to receive federal funding for your program, students must take the right amount of and type of foods to equal a reimbursable meal. Reimbursable meals are designed to ensure that students have a balanced, healthy meal.

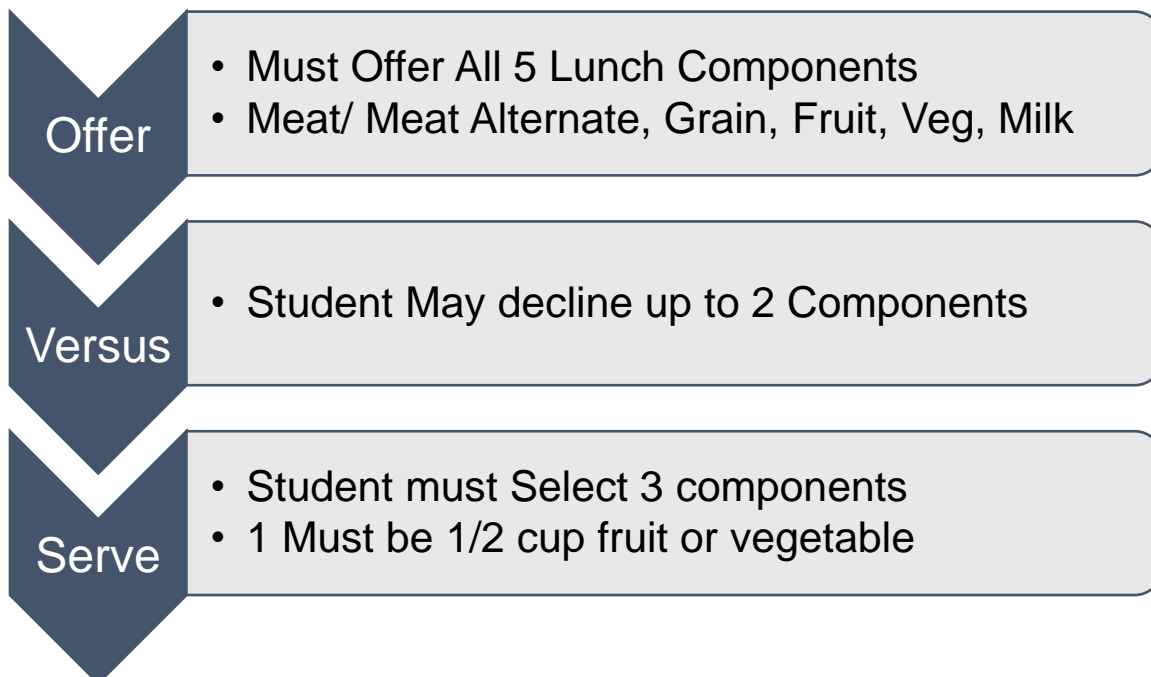
### **Offer Versus Serve (OVS)**

OVS is a requirement in the NSLP for high schools and is an option for lower grade levels. It is also an option for all grades in the SBP. It is highly recommended for elementary and middle schools. This service style leads to lower food waste and higher participation rates due to a perception of choice.

It is a concept that applies to menu planning and determination of reimbursable school meals. It allows students to decline some food components offered for breakfast and lunch.

The components of a reimbursable meal must be identified at or near the beginning of the serving line. Schools may determine the best way to present this information such as with a sample tray, poster, digital picture frame, and food models.

### **Lunch Offer Versus Serve**



### **Example Lunch Menu #1**

Menu Offered	Meal #1 Acceptable as Reimbursable Meal	Meal 2 Not Acceptable as Reimbursable Meal
Cheeseburger Whole Orange/Diced Peaches Carrot Sticks/French Fries 1% Milk/FF Milk	Cheeseburger French Fries	Cheeseburger Milk

What's Missing? Although Meal #2 has three components, it is missing the ½ cup fruit or vegetable in order to make this a reimbursable meal.

### **Example Lunch Menu #2**

Menu Offered	Meal #1 Acceptable as Reimbursable Meal	Meal 2 Not Acceptable as Reimbursable Meal
Cheeseburger Whole Orange/Diced Peaches Carrot Sticks/French Fries 1% Milk/FF Milk	Diced Peaches French Fries Milk	Carrot Sticks French Fries Milk

What's Missing? Meal #1 has three components in their meal: fruit, vegetable, and milk. Meal #2 has only two components, vegetables and milk. For Meal #2 to be reimbursable, the student would have to take any of the other remaining components on the menu, fruit or entrée.

### **Salad Bars**

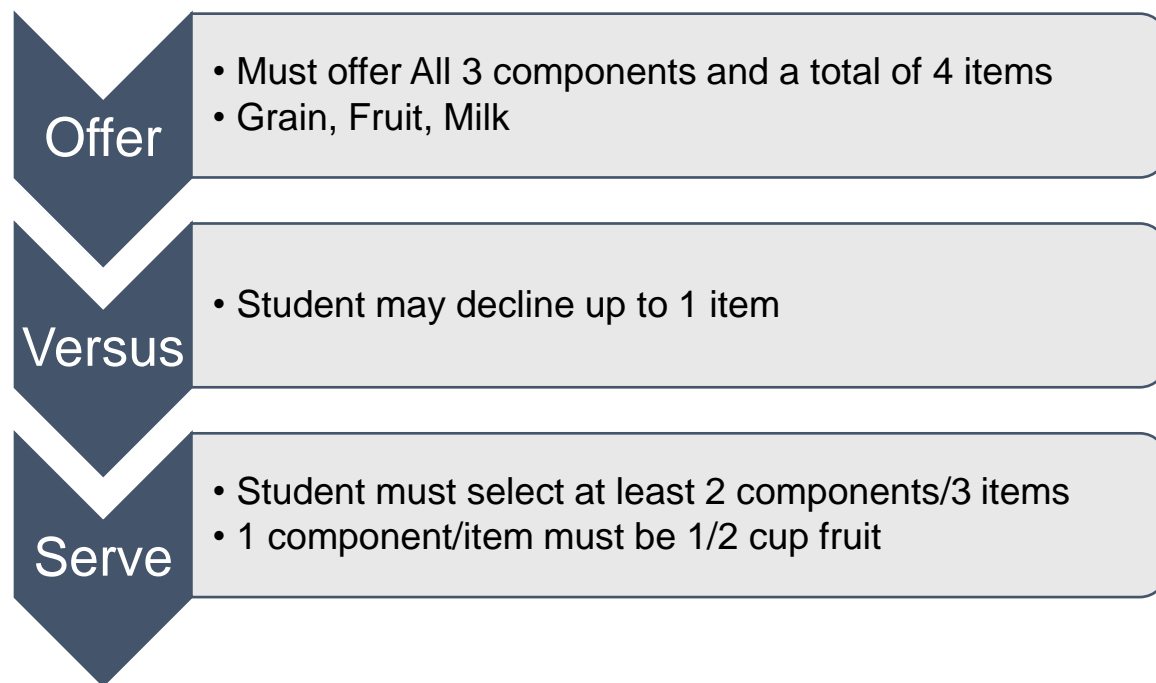
Salad bars can be used in order to allow students to self-serve themselves fresh fruit and vegetable components. Fruit and vegetables can be offered on the serving line as well. If a student selects a fruit or vegetable before they reach the salad bar, they are not required to take an item off the salad bar as well.

Access to the salad bar cannot be removed as a form of punishment. If vegetable subgroups are present on the salad bar, all students must be able to make selections off the salad bar.

### **Breakfast Offer vs. Serve**

3 Food Components for Breakfast:

- Milk
- Fruit/Vegetable/Juice
- Grains/Breads
- Serving of M/MA or Grain can be identically duplicated and count as two items (example. 2 slices of toast)



Four food items must be offered to students and priced as a unit. Serving sizes are equal to the minimum quantities required by grade group. Students have the option of which one item to decline.

### **Example Breakfast Menu #1**

Menu Offered	Meal #1 Acceptable as Reimbursable Meal	Meal 2 Not Acceptable as Reimbursable Meal
Cereal Bar String Cheese Fresh Apple/Diced Pears 1% Milk/FF Milk	String Cheese Apple Milk	Diced Pears Milk

What's Missing? Meal #2 has only two items. Any additional item would make this meal reimbursable.

### **Example Breakfast Menu #2**

Menu Offered	Meal #1 Acceptable as Reimbursable Meal	Meal 2 Not Acceptable as Reimbursable Meal
Blueberry Muffin(2oz) Fresh Apple/Diced Pears 1% Milk/FF Milk	Blueberry Muffin (2oz) Apple	Blueberry Muffin (2oz) Milk

What's Missing? The Muffin size counts as two items because one ounce of grain is one item. Meal #1 technically has three items. Meal #2 has three items, but one is not a fruit. With this menu, no one can refuse the muffin because of its size.

### **Meal Pattern Regulations**

The following section outlines the Meal Pattern for the National School Lunch Program and School Breakfast Program.

Please go to the following [link](#) or to <https://www.cde.state.co.us/nutrition/osnschoolbreakfastprogrambreakfastmealpattern> for the Breakfast Meal Pattern.

Please go to the following [link](#) or to <https://www.cde.state.co.us/nutrition/osnslpmealpattern> for the Lunch Meal Pattern.

### **Seconds**

If a school elects to offer second servings of any part of the reimbursable meal, these foods must be counted toward the daily and weekly component contributions, as well as the weekly nutrient standards. However, if second helpings or second meals are sold a la carte, they do not contribute toward the components or nutrient standards for reimbursable meals.

Occasionally, small quantities of leftover food served on another day will not be counted toward the meal component requirements, including the vegetable subgroups. CDE has discretion to determine whether such leftovers are of a reasonable amount and are not occurring on a regular basis.

### **Off-Site Meals for Field Trips**

Students who are off campus at a structured school-sponsored event are eligible to participate in the school lunch program. The meals provided must meet the daily meal pattern requirements and be served to students who are the responsibility of the school until they return to campus or are released at a certain time from the event. (FNS 786-8) The meals must be consumed as part of the school-related event/activity between 10 a.m. and 2 p.m.

### **Food Safety Precautions**

Care must be taken to ensure food safety with these meals. Use coolers with ice for milk and avoid using potentially hazardous foods for the remaining components. Any potentially hazardous foods must be surrounded by ice/ice packs or refrigerated.

### **Recordkeeping**

The sack lunches must be recorded on the daily production record. Record as an additional meal choice with each component listed, portion sizes, etc.

### **Point of Service Accountability**

A roster must be checked as students are served the sack lunch. The roster is returned to the lunch accountability staff person following the service of the meal. Based on the checked roster, the number of sack lunches served is added to the school lunch counts for the day.

Children eligible for free and reduced-price meals must receive appropriate meal benefits without being overtly identified. Eligible students participating in a school sponsored activity at

another school must have the opportunity to receive benefits or eat meals at that school. The school where the child is enrolled must provide information establishing eligibility.

### **USDA Foods**

USDA Foods are foods purchased by the United States Department of Agriculture (USDA) and donated to school districts for use in their food service operation.

### **Purpose**

The purpose of USDA Foods is to support agriculture markets and to provide nutritious USDA-purchased food to applicable agencies (i.e., public schools) and to improve the nutritional quality of food items served in recipient agencies.

### **Who's Eligible**

All schools participating in the National School Lunch Program are eligible to receive USDA donated commodities through the Food Distribution Program (FDP).

### **Use and Sale of USDA Foods**

USDA Foods can be used to prepare food items and side meals required by the NSLP/SBP, such as lunch and breakfast.

## Types of Commodities

### **Department of Defense Fresh Produce**

This type of commodities allows participants to use a portion of their entitlement to request fresh, locally grown produce. A minimum order must be at least \$150.00. Entitlement funds must be diverted to the DoD through Food Distribution. Contact CSI School Nutrition Specialist to help with this process.

### **Direct Delivery (Brown Box)**

Direct Delivery is also referred to as Brown Box. This is due to the package color. It usually includes canned vegetables and fruit, frozen meat, cheeses, etc.

### **Commodity Processing**

Commodity processing makes efficient use of donated foods by converting items like ground beef and cut up chicken into more convenient, ready to use end products. An example of this is ground beef processed into beef patties.

### **Net Off Invoice**

Net Off Invoice (NOI) is an indirect pass through a value discount. The school is invoiced by the distributor. Like Commodity Processing, schools utilize donated foods in order to receive a discount on each case of product purchased through the distributor. This option can eliminate the need for excessive storage and delivery costs. The deliveries come just in time instead of all at once. For more information on the NOI process please visit the Colorado Department of Food Distribution or contact the CSI School Nutrition Specialist.

### **Each School's Entitlement**

Entitlement dollars represent the value of the food you receive. It is not out-of-pocket money. A school's entitlement is determined by the previous year's number of lunch meals served multiplied by the commodity rate of assistance. Schools will be responsible for paying out-of-pocket expenses such as delivery charges, administrative charges, and processing charges.

CSI will work with the Food Distribution Staff each year in January in order to calculate and ensure you receive your school's entitlement allotment. CSI will then inform each school of their funds and work with the school to determine how best to spend their funds for the following year.

### **School District Sites**

Schools receiving food service from a local district will have their funds diverted into the districts funds and receive credits back each month from the district's utilization of product.

### **Food Service Vendor Sites**

CSI recommends the funds be diverted into DoD (Department of Defense) funds for the purchase of fresh produce through the FFAVORS system. Your food service vendor will then provide a credit for the amount of produce that was ordered each month. Your school is responsible for monitoring the credits issued.

### **Smart Snacks and Competitive Foods**

For more information on Smart Snacks and Competitive Foods, please go to the following [link](#) or to

<https://www.cde.state.co.us/nutrition/osnsmartsnacksandcompetitivefoodsquickreferenceguide> for guidance.

### **Special Diet Requirements**

Child nutrition programs regulations require participating schools to offer to all participants breakfasts, lunches, suppers, supplements and milk that meet the meal requirements identified in the program regulations. Departmental regulations further require substitutions to the standard meal requirements for participants who are considered disabled. The provisions requiring substitutions for disabled participants respond to the requirements of Section 504 of the Rehabilitation Act of 1973 and to the USDA's implementing regulations, 7 CFR Part 15b.3, which provide that no otherwise qualified disabled individuals shall solely on the basis of disability be excluded from participation in, be denied benefit of or subjected to discrimination under any program or activity receiving federal financial assistance.

Schools are required to offer program meals to participants with disabilities whenever program meals are offered to the general population served by the programs. School districts should be aware that the Individuals with Disabilities Education Act (IDEA) imposes requirements on states that may affect them, including the service of meals even when such service is not required by the child nutrition programs.

### **CSI Training Requirements**

CSI requires that any person involved in aspects of a Child Nutrition Program attend training in that aspect. Any change in job responsibility, reassignment, or new hire that involves Child Nutrition Programs must be communicated with CSI in order to ensure that personnel are properly trained. The school remains responsible for program compliance even with changes in personnel and could be issued with written corrective actions or lose access to Primero Edge Point of Sale if transitions are not handled properly and compliance comes into question. In addition, all employees with Child Nutrition Responsibilities are responsible for being compliant with USDA Professional Standards training hours. All existing Nutrition staff must complete Back to School training when CSI schedules it in July/August. All new staff must complete Back to School training within 30 days of hire. CSI may not claim meals for reimbursement or may hold reimbursement if training is not compliant.



## Wellness Policy & Committee

### **What is Wellness Policy?**

Congress recognized the role schools play in promoting health and preventing childhood obesity and other chronic diseases. In 2004 Congress passed a law requiring that all school districts participating in federal Child Nutrition Programs develop and implement wellness policies by the start of school year 2006-2007.

Districts are encouraged to adopt policies that ensure every student has access to:

- Healthful food choices in appropriate portions
- Healthful meals in the school cafeteria with adequate time to eat.
- Healthful items in vending machines
- Healthful items for fundraisers, classroom parties and rewards in school
- Fresh produce from Colorado farms, when practical
- Access to an adequate amount of drinking water throughout the day
- Access to age-appropriate physical activity
- Access to age-appropriate and culturally sensitive instruction is designed to teach lifelong healthy eating and physical activity habits.

### **What is required?**

At a minimum the local school wellness policy must:

- Include goals for nutrition education, physical activity, and other school-based activities that are designed to promote student wellness in a manner that the local educational agency determines is appropriate.
- Include nutrition guidelines selected by the LEA for all foods available on each school campus under the LEA during the school day with the objectives of promoting student health and reducing childhood obesity.
- Provide an assurance that reimbursable school meals meet USDA guidelines.
- Establish a plan for measuring implementation of the local wellness policy, including designation of 1 or more people within the local educational agency or at each school, as appropriate, charged with operational responsibility for ensuring that the school meets the local wellness policy.
- Involve parents, students, representatives of the school food authority, the school board, school administrators, school staff, and the public in the development of the school wellness policy.
- CSI schools participating in federal Child Nutrition programs must comply with the CSI Wellness Policy.
- All schools under the CSI must complete a Local Wellness Policy (LWP) Assessment at least once every 3 years.

### **What is encouraged but not required?**

All schools are strongly encouraged to develop their own school wellness policy that has more stringent requirements than the CSI Wellness Policy (the policy cannot be more lenient). Participation in the CSI Wellness Committee is appreciated, but not mandatory.

### **School Responsibilities**

- Develop, implement, monitor, review, and as necessary, revise the Wellness Policy with input from stakeholders (parents, students, representatives of the school food authority, the school board, school administrators, school staff, and the public)
- Participation in the CSI Wellness Committee (highly encouraged)

### **Charter School Institute School Food Authority Responsibilities**

- Designate 1 or more people within the school charged with operational responsibility for ensuring that the school meets the CSI Wellness Policy.
- Complete triennial Local Wellness Policy Assessment Tool
- Provide feedback on CSI Wellness Policy to schools and to the public.
- Create and participate in CSI Wellness Committee

### **Current CSI Wellness Policy**

Please see the CSI website Nutrition page to obtain a copy of the CSI Wellness Policy.

## Nondiscrimination Statement

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To file a program complaint of discrimination, complete the USDA Program Discrimination Complaint Form, (AD-3027) found online at: [http://www.ascr.usda.gov/complaint\\_filing\\_cust.html](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](mailto:program.intake@usda.gov).

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