# Financial Management Requirements for the School Nutrition Programs



Connecticut State Department of Education Bureau of Child Nutrition Programs 450 Columbus Boulevard, Suite 504 Hartford, CT 06103-1841

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#### Requirements for Financial Management of the School Nutrition Programs

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## 1 — Introduction

This guide contains information and resources to help school food authorities (SFAs) comply with the federal and state regulations for financial management of the U.S. Department of Agriculture's (USDA) school nutrition programs. This guide applies to all public schools, private schools, and residential child care institutions (RCCIs) that participate in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, Afterschool Snack Program (ASP) of the NSLP, and Special Milk Program (SMP).

> The contents of this guide are subject to change. The CSDE will update this guide as the USDA issues additional policies and guidance regarding financial management of the school nutrition programs. Please check the CSDE's Financial Management for School Nutrition Programs webpage for the most current version. For questions, contact the SFA's assigned CSDE school nutrition team member.

The requirements for financial management of the USDA's school nutrition programs are defined by the Code of Federal Regulations (CFR) for the NSLP, SBP, and SMP, and the federal procurement standards (2 CFR Part 200).

- 7 CFR Part 210: National School Lunch Program
- 7 CFR Part 215: Special Milk Program for Children
- 7 CFR Part 220: School Breakfast Program
- 2 CFR Part 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

SFAs that operate the school nutrition programs must comply with these requirements, as well as any applicable state and local regulations. For more information on the federal and state laws for school nutrition programs, refer to the Connecticut State Department of Education's (CSDE) Laws and Regulations for Child Nutrition Programs webpage.

Funds from the nonprofit school foodservice account (NSFSA) cannot be used for expenditures that are not directly related to operation of the USDA school nutrition programs. Any positive balance remaining in the NSFSA at the end of the school year must be carried over to the next school year as a beginning balance in the NSFSA.

## 2 | Federal and State Funding

All charges to the NSFSA must be allowable. Costs must be necessary, reasonable, allocable, and consistently treated as direct or indirect. For definitions of terms, refer to section 6.

## **Operating the School Nutrition Programs**

In addition to the financial requirements, school nutrition programs must comply with many other federal and state requirements. For access to information on the federal and state requirements and guidance for school nutrition programs, visit the CSDE's Program Guidance for School Nutrition Programs webpage.

This section summarizes the requirements for financial management of the USDA's school nutrition programs. For additional guidance, visit the CSDE's Financial Management for School Nutrition Programs webpage.

#### Nonprofit School Food Service

The school food service program must be nonprofit. Section 7 CFR 210.9(a)(1) of the NSLP regulations and 7 CFR 220.13(i) of the SBP regulations require SFAs to maintain a nonprofit school food service and observe the requirements for and limitations on the use of nonprofit school food service revenues (7 CFR 210.14) and the limitations on any competitive school food service (7 CFR 210.11). "Nonprofit school food service" means all food service operations conducted by the school food authority principally for the benefit of students, all the revenue from which is used solely for the operation or improvement of such food services.

#### Nonprofit School Food Service Account (NSFSA)

Sections 7 CFR 210.14(a) of the NSLP regulations and 7 CFR 220.13(i) of the SBP regulations require SFAs to establish a NSFSA. The "NSFSA" is the restricted account in which all the revenue from all food service operations conducted by the SFA principally for the benefit of students is retained and used only for the operation or improvement of the nonprofit school food service. The NSFSA includes, as appropriate, non-Federal funds used to support paid lunches (7 CFR 210.14(e)) and proceeds from nonprogram foods (7 CFR 210.14(f)).

The NSFSA can be part of the local educational agency's (LEA) general fund. SFAs are not required to maintain a separate NSFSA. If the NSFSA is part of the general fund, the LEA and SFA must maintain clear documentation of all expenses and revenues associated with the school nutrition programs.

The SFA must maintain a NSFSA to: 1) ensure that the school food service operates on a nonprofit basis; and 2) safeguard assets of the school food service and ensure that they are used only for authorized purposes. The SFA is the steward of the NSFSA and maintains the funds available for the school nutrition programs. The SFA is responsible for ensuring that 1) only allowable costs are paid with NSFSA funds; and 2) costs are properly classified as direct or indirect. The SFA should continuously monitor costs charged to the NSFSA.

#### Revenues

Revenue is all money that is provided to the NSFSA. This includes but is not limited to: Federal reimbursement; state or local funds such as per meal subsidies, state matching funds, and HFC funds (refer to section 2); children's payments for reimbursable meals and a la carte sales; payments for items purchased for vending machines; and income from catering, adult meals, and vended meals.

#### Expenses

Expenses must comply with the cost principles of 2 CFR Part 200 Subpart E. These principles are summarized in the USDA's manual, *Indirect Costs: Guidance for State Agencies & School Food Authorities*. Costs charged to the NSFSA must be necessary, reasonable, allocable (direct or indirect), and consistently treated as direct or indirect.

- A cost is **necessary** if the SFA's authorizing statutory provisions, resulting program regulations, or applicable FNS policy establish that the nonprofit school food service cannot be operated without incurring the cost. For example, a school food service cannot be operated without incurring the cost of appropriate food.
- A cost is reasonable if, in its nature and amount, it does not exceed that which would be
  incurred by a prudent person under the circumstances prevailing at the time the decision was
  made to incur the cost. The cost must be the result of sound business practice and
  competitive prices. For example, the cost of food is a reasonable cost to operate the
  nonprofit school food service if incurred according to these conditions.

Costs must meet the criteria specified in 7 CFR 403. Costs must be consistent with policies and procedures that apply uniformly to both federally financed and other activities of the non-federal entity. Costs must be determined in accordance with Generally Accepted Accounting Principles (GAAP). Costs cannot be included as a cost or matching contribution of any other grant unless allowed by Federal regulations. All costs must be adequately documented.

All purchases from the NSFSA must comply with procurement requirements. Federal, state, and local laws and regulations specify the methods that SFAs must follow to properly procure goods and services. For more information, refer to the CSDE's Procurement for School Nutrition Programs webpage.

Table 1 summarizes the allowable and unallowable expenses for school nutrition programs per federal regulation.

Table 1. Examples of allowable and unallowable expenses for school nutrition programs <sup>1</sup>		
Allowable expenses <sup>2</sup>	Unallowable expenses	
<ul> <li>Food service staff salary and benefits</li> <li>Food service staff training</li> <li>Freight charges for USDA Foods</li> <li>Supplies and materials for food service consumption</li> <li>Supplies and materials for food service sale or rental</li> <li>Utilities and communications (directly billed, such as a separate meter or using an indirect rate or cost allocation plan)</li> <li>Food service management fees</li> <li>Furniture and equipment for food service (refer to "Capital Expenditure Requests and Equipment Approvals" in this document)</li> <li>Computer hardware and software for food service</li> <li>Vehicles/transportation equipment for food service</li> </ul>	<ul> <li>Land</li> <li>Buildings</li> <li>General Construction</li> </ul>	

These expenses are not all-inclusive.

#### Meals for school nutrition program employees

SFAs may choose to serve meals at no charge to adults directly involved in the operation and administration of the NSLP and SBP. This includes staff members responsible for menu planning, purchasing, preparation, clean-up, and service of the meals. The cost of these meals may be paid for from the NSFSA.

<sup>&</sup>lt;sup>2</sup> SFAs must ensure that all expenses are necessary, reasonable, and allocable. For more information, refer to page 14 of the USDA's manual, Indirect Costs: Guidance for State Agencies & School Food Authorities.

Meals for non-school nutrition program employees

The NSFSA cannot be used to cover the cost of meals served to teachers, custodians, administrative personnel, or other staff members who are not involved in the planning, preparation, clean-up, or service of meals. Funds available to pay the cost of student meals cannot be used to supplement the cost of adult meals. SFAs must charge these adults the established adult meal price (refer to "Adult meal pricing" in this section).

If the LEA includes meals as a fringe benefit or as part of the salary arrangement for non-school nutrition program personnel, the SFA must transfer enough money from other funds to the NSFSA to pay the cost of these adult meals. Funds transferred into the NSFSA for these purposes must be documented for audit purposes.

#### Loans to the NSFSA

The USDA does not allow a fund transfer into the NSFSA to be retroactively designated as a loan that is subject to repayment. For a liability to exist, a bona fide loan agreement must be in effect at the time that the funds are transferred. For example, documenting that past deficits to the NSFSA were covered by local contributions is not sufficient to demonstrate that the local contributions were transferred to the NSFSA with the intent that the money would be repaid.

Short-term or multi-year obligations are permissible provided that a bona fide loan agreement exists at the time that funds are made available. Interest payments are not allowable program expenditures.

The conditions for repayment must be documented and agreed to in advance by both parties, the general fund manager, and the school nutrition programs. The agreement must be maintained on file and available for review during an Administrative Review, audit, or upon request by the state or federal agency.

#### **Direct and Indirect Costs**

Allowable expenses can include direct and indirect costs. SFAs must make careful and consistent considerations in determining whether certain types of costs should be categorized as a direct or indirect cost.

#### Direct

Section 2 CFR 200.413 indicates that direct costs are "those that can be identified specifically with a particular final cost objective." Direct costs are exclusively attributable to the nonprofit school food service and can be substantiated through written documentation such as timecards, invoices, and receipts. Table 2 shows examples of direct costs.

#### **Indirect**

Indirect costs are costs incurred for the benefit of multiple programs, functions, or other cost objectives that cannot be readily and specifically identified with a particular program or other cost objective. Indirect costs typically support administrative overhead functions such as fringe benefits, accounting, payroll, purchasing, facilities management, and utilities.

SFAs must follow fair and consistent methodologies to **identify and allocate** allowable indirect costs to the NSFSA. Indirect costs are necessary for the general operation of the SFA. However, due to their generic nature, indirect costs are not readily assignable to specific functions or activities of school nutrition programs. Indirect costs must therefore be assigned to benefitting programs and other cost objectives through an allocation process. SFAs must use one of the two acceptable methods below to allocate indirect costs.

- Indirect cost rate: Each school year, LEAs may submit an Indirect Cost Rate Proposal to
  the CSDE's Office of Finance and Internal Operations to receive approval to charge an
  indirect cost rate. If the LEA has received an approved Indirect Cost Rate from the CSDE,
  the LEA must follow the applicable guidance from the CSDE's Office of Finance and
  Internal Operations.
- 2. Cost allocation plan: The SFA's business office completes a cost allocation plan and maintains it on file. A cost allocation plan is a mathematical exercise used to assign indirect costs to particular programs and other cost objectives, such that each program or other cost objective bears a portion of the indirect costs that is commensurate with the benefit received from such costs. This method provides a shorthand approach to determining in a reasonable manner the proportion of indirect costs each program or other cost objective should bear.

Table 2 shows examples of indirect costs. For detailed guidance refer to the USDA's manual, *Indirect Costs: Guidance for State Agencies & School Food Authorities*.

Direct Costs	Indirect Costs
<ul> <li>Wages and salaries of food service workers</li> <li>Cost of purchased food</li> <li>Food service supplies</li> <li>Media/promotional materials relating to the food service</li> <li>Capital expenditures relating to food service, e.g., food service equipment purchases</li> </ul>	<ul> <li>Payroll services</li> <li>Human resources</li> <li>Workers' compensation</li> <li>Procurement</li> <li>Gas</li> <li>Electricity</li> <li>Sewer</li> <li>Water</li> <li>Trash</li> <li>Superintendent's office</li> </ul>

#### **Procurement**

SFAs must comply with all applicable Federal, state, and local laws and regulations for proper procurement of goods and services (2 CFR 200 and 7 CFR 210). For more information, refer to the CSDE's Procurement for School Nutrition Programs webpage.

#### **Capital Expenditure Requests and Equipment Approvals**

Section 2 CFR 200.439 requires SFAs to obtain prior approval from the state agency for equipment purchases of \$5,000 or more. "**Equipment**" is any item of nonexpendable personal property with a useful life of a year or longer and an acquisition cost which equals or exceeds the Federal per-unit capitalization threshold of \$5,000.

SFAs may purchase equipment listed on the CSDE's Capital Expenditure Approved List for School Food Authority Equipment Purchases without prior approval. However, as required by 2 CFR 200.439, SFAs must receive prior approval from the CSDE for any capital expenditure requests for equipment with a unit cost of \$5,000 or greater that is not included on this list. Any used equipment with a purchase price over \$5,000 also requires CSDE prior approval. SFAs must use the CSDE's Capital Expenditure Request Form to request approval.

For more information, refer to USDA Memo SP 39-2016: State Agency Prior Approval Process for School Food Authority (SFA) Equipment Purchases. This guidance is available in the "Capital Expenditure Requests and Equipment Approvals" section of the CSDE's Financial Management for School Nutrition Programs webpage.

#### **Net Cash Resources (NCR): Three-Month Operating Balance**

To maintain the SFA's nonprofit status, sections 7 CFR 210.14(b) and 7 CFR 210.19(a)(1) of the NSLP regulations require that the fund balance (net cash resources) of the NSFSA cannot exceed three months' average expenditures as of June 30 of each year. "Net cash resources" means all monies, as determined in accordance with the state agency's established accounting system, that are available to or have accrued to a SFA's nonprofit school food service at any given time, less cash payable. These monies may include, but are not limited to, cash on hand, cash receivable, earnings on investments, cash on deposit and the value of stocks, bonds, or other negotiable securities.

#### Financial report

To document compliance with the NCR requirement, SFAs must submit the annual Financial Report for School Nutrition Programs in the Connecticut Online Application and Claiming System for Child Nutrition Programs (CNP System). The CSDE's *Instructions for Submitting the Financial Report for School Nutrition Programs* provide step-by-step guidance on how to complete this report.

#### Plan to reduce excess operating balance

SFAs that exceed three months' average expenditures must submit a *Plan for Reducing Excess Operating Balance* to the CSDE to indicate how the excess balance will be spent to maintain the SFA's nonprofit status. Expenditures must make improvements to the USDA school nutrition programs such as improving food quality and replacing or purchasing necessary equipment.

SFAs that exceed three months' average expenditures must submit their *Plan for Reducing Excess Operating Balance* as part of their annual Financial Report.

For detailed instructions, refer to the CSDE's *Instructions for Completing the Plan to Reduce Excess Operating Balance*.

#### Paid Lunch Equity (PLE)

Section 7 CFR 210.14(e) of the NSLP regulations requires SFAs to ensure that schools provide the same level of support for lunches served to students who are not eligible for free or reduced-price lunches (i.e., paid lunches) as lunches served to students eligible for free lunches. SFAs are required to compare the average price charged for lunches served to students receiving paid lunches to the difference between the higher Federal reimbursement provided for free lunches and the lower Federal reimbursement provided for paid lunches.

The USDA annually provides a PLE Tool to assist SFAs with making price adjustment calculations. During the NSLP application renewal process, SFAs must use the USDA's PLE Tool to ensure that paid lunch prices are set appropriately to cover the cost of a paid student meal. If the average paid lunch price is less than the difference, the SFA must either gradually adjust average prices or provide non-Federal funding to cover the difference. For more information, visit the "Paid Lunch Equity" section of the CSDE's Financial Management for School Nutrition Programs webpage.

#### Student meal pricing

SFAs establish the prices for meals and meal service options. Pricing must comply with all applicable USDA regulations.

Sections 7 CFR 210.9(b)(6) and 7 CFR 220.7(e)(3) require SFAs to price reimbursable meals as a unit. This means that students eligible for free meals receive meals at no charge; students eligible for reduced-price meals pay the current reduced-price charge; and all other students pay the full price for the meal.

The maximum amount that SFAs can charge for students who are eligible for reduced-price meals is 40 cents for lunch, 30 cents for a breakfast, and 15 cents for ASP snack. Implementing the offer versus serve (OVS) provision cannot affect the selling price for a reimbursable meal, regardless of the menu items selected by the student.

SFAs may charge different unit prices for different paid reimbursable meal choices. However, students eligible for free and reduced-price meals are also able to select these higher-price meals without incurring an additional charge.

#### **Unpaid Meal Charges**

As indicated in CSDE Operational Memorandum No. 04-17, the CSDE requires that households pay all delinquent student debts no later than June 30 to ensure that students' accounts are closed. Any delinquent debts that have not been recovered by June 30 will be considered bad debt. These student meal accounts must be at a zero balance for the next school year.

"Bad debt" applies to the NSFSA when unpaid meal charges are not collected and are considered a loss. Section 2 CFR 200.426 of Subpart E indicates that "Bad debts...arising from uncollectable accounts and other claims, are unallowable. Related collection costs, and related legal costs, arising from such debts after they have been determined to be uncollectable are also unallowable." The NSFSA cannot be used to cover costs related to the bad debt, such as continued legal and collection costs.

While bad debt must be written off as an operating loss, it cannot be absorbed by the NSFSA but must be restored using nonfederal funds. These funds may come from the school district's general fund, special funding from state or local governments, school or community organizations, private donations, or any other nonfederal sources. Once delinquent meal charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 CFR 210.9(b)(17) and 7 CFR 210.15(b).

#### USDA requirements for unpaid meal charge policy

USDA Memo SP 46-2016 requires all SFAs to have a written and clearly communicated system to address meal charges. SFAs must inform students and their parents or guardians about how students who pay the full or reduced-price cost of a reimbursable meal are impacted by having insufficient funds on hand or in their account to purchase a meal.

SFAs must provide the policy in writing to all households at the start of each school year and to households that transfer to the school during the school year. SFAs must also provide the meal charge policy to all school or SFA-level staff responsible for policy enforcement. The USDA encourages SFAs to:

- include the policy in student handbooks and online portals used by households to access student accounts;
- use multiple methods to disseminate the policy; and
- the first time the policy is applied to a specific student, provide the written policy again to the household through mail or email.

For more information, refer to the USDA's manual, *Overcoming the Unpaid Meal Challenge*, and the USDA memos below and visit the USDA's Unpaid Meal Charges webpage.

- USDA Memo SP 23-2017: Unpaid Meal Charges: Guidance and Q&A
- USDA Memo SP 47-2016: Unpaid Meal Charges: Clarification on Collection of Delinquent Meal Payments
- USDA memo SP 46-2016: Unpaid Meal Charges: Local Meal Charge Policies

#### State requirements for unpaid meal charge policy

C.G.S. Section 10-215(b) requires that each board of education's (BOE) unpaid meal charge policy must include the three elements below.

- 1. A prohibition on publicly identifying or shaming a child for any unpaid charges, including but not limited to delaying or refusing to serve a meal to the child, designating a specific meal option for the child (such as offering a cheese sandwich as an "emergency meal"), or taking any disciplinary action against the child.
- 2. A declaration of the right for any child to purchase a meal that may exclude any a la carte items or be limited to one meal. For example, the LEA's policy must allow each child to purchase a meal but could exclude purchases of a la carte items and more than one meal during the meal service.
- 3. A procedure for communicating with parents or guardians for the purpose of collecting unpaid charges. Communication must include but is not limited to: information regarding local food pantries; applications for free or reduced-priced meals; applications for the Supplemental Nutrition Assistance Program (SNAP) administered by the Department of Social Services (such as the Connecticut State Department of Education's *Addendum C: Information on the Supplemental Nutrition Assistance Program (SNAP)* available in English and Spanish); and a link to the town's website listing any community services available to residents.

If a child's unpaid charges equal or exceed the cost of 30 meals, the LEA must refer the parent or guardian to the LEA's local homeless education liaison.

C.G.S. Section 10-215(c) allows a local or regional board of education to accept gifts, donations, or grants from any public or private sources for the purpose of paying off any unpaid meal charges.

For additional guidance, refer to CSDE Memorandum No. 11-22: Connecticut Statutory Requirements for Unpaid Meal Charges.

#### **Nonprogram Foods**

Section 7 CFR 210.14(f) of the NSLP regulations requires that the revenue from the sale of nonprogram foods covers the cost of the food and is not subsidized though federal reimbursement. "Nonprogram foods" include any nonreimbursable foods and beverages purchased using funds from the NSFSA. This encompasses all foods sold in schools such as a la carte items (e.g., milk, juice, entrées, and snack foods), second student meals, adult meals, foods sold outside of school hours, and any foods used for catering or vending activities. For most SFAs, a la carte foods offered during meal service account for the largest share of nonprogram foods.

#### Nonprogram revenue calculator

SFAs that sell nonprogram foods are required to determine if the percent of total revenue generated from nonprogram food sales is equal to or greater than the percent of total food costs that are attributable to the SFA's purchase of nonprogram foods. SFAs may use the USDA's Nonprogram Revenue Calculator to determine this information. For detailed guidance, refer to USDA Memo SP 20-2016: Nonprofit School Food Service Account Nonprogram Food Revenue Requirements.

SFAs that do not sell any nonprogram foods are not required to complete the USDA's Nonprogram Revenue Calculator.

The CSDE reviews compliance with the nonprogram revenue requirement through the resource management section of the Administrative Review for school nutrition programs. SFAs will receive additional information from the CSDE when they are scheduled for an Administrative Review.

#### A la carte pricing

A la carte pricing applies to all foods and beverages sold separately from reimbursable meals and ASP snacks. A la carte prices must cover the cost of producing the menu item such as food cost, labor, and indirect costs. SFAs should determine a la carte pricing information using the CSDE's *Pricing Worksheet for A La Carte Sales in School Nutrition Programs*. **Note:** A la carte pricing should not create an incentive for students to choose a la carte items because the price is less than a reimbursable meal.

#### Adult meal pricing

Adult meal pricing is the price charged to adults (such as teachers, staff, and visiting adults) who purchase a meal at a site participating in the NSLP or SBP. The benefits of the NSLP and SBP are for enrolled children only. SFAs must ensure that NSFSA revenues do not subsidize adult meals.

The price of adult meals cannot be less than the actual cost of providing the meals. SFAs should determine pricing information using the CSDE's *Nonprogram Pricing Worksheet for Adult Meals*. **Note:** If sponsors do not intend to charge these prices, the lost revenue cannot be recouped from child payments or reimbursement.

## 3 — Federal and State Funding

This section summarizes the federal and state funding for the USDA's school nutrition programs. The USDA provides two types of support for school meals: cash reimbursements for meals and snacks that meet the meal patterns; and USDA Foods. Additional state funding is provided to Connecticut SFAs through state match for the NSLP, the State School Breakfast Grant Program, and Healthy Food Certification (for public schools only).

## Reimbursement for Meals and Snacks in the School Nutrition Programs

SFAs receive federal reimbursements for lunches, breakfasts, afterschool snacks, and milk served to students participating in the NSLP, SBP, SSO, ASP and SMP. The reimbursement rates are determined annually by the USDA and are effective from July 1 through June 30. The current reimbursement rates are available on the CSDE's Reimbursement Rates for Child Nutrition Programs webpage.

Connecticut sponsors of the school nutrition programs submit claims online through the CSDE's Online Application and Claiming System for Child Nutrition Programs (CNP System). SFAs must submit monthly claims for reimbursement to the CSDE following the deadlines in the CSDE's Claim Submission Schedule. The current year's Claims Submission Schedule is available on the CSDE's Claim Submission Schedule for Child Nutrition Programs webpage.

To ensure timely payment of claims, the CSDE's claim due date is the 15<sup>th</sup> of the month following the last day of the month covered by the claim. When the 15th falls on a weekend or holiday, the due date follows the schedule outlined in the CSDE's Claim Submission Schedule. A claim that is entered after the due date cannot be processed until the next month. Sponsors must ensure that monthly reimbursement claims are: 1) entered and 2) submitted for payment in the CNP System by the deadline to ensure timely payment.

The USDA regulations for the NSLP and SBP specify time limits for sponsors to submit monthly claims for reimbursement. Final claims, including any revisions, must be submitted to the CSDE no later than 60 days following the last day of the month covered by the claim. Claims not filed or corrected within the 60 days might not be paid.

## 3 Federal and State Funding

#### Late claims

A claim that is submitted after the final deadline will only be paid if the sponsor is eligible and approved for a one-time exception. The CSDE has the authority to approve a one-time exception every 36-months for one month's original or revised claim submitted after the 60-day deadline that results in increased reimbursement when the lateness is due to reasons within the control of the sponsor. The one-time exception must be from the federal fiscal year (October 1 through September 30) to which the claim applies.

To be considered for payment, one of the two approved authorized signers is required to submit a request for the one-time exception (including a corrective action plan) no later than December 15. For additional guidance, contact your CSDE county consultant (refer to "CSDE School Nutrition Programs Staff" in section 1).

#### State Match for the NSLP

Section 7 CFR 210.17 of the NSLP regulations requires states to appropriate a minimum level of state funds ("state match") to be paid as reimbursement to SFAs that participate in the NSLP. The funding level for Connecticut's state match is \$2,354,000. The CSDE's calculation for state match payments includes lunch meal counts for the NSLP from the prior year (July 1 through June 30) and the SSO (after the end of the academic school year through the start of the next academic school year).

## **State School Breakfast Grant Program**

Section 10-266w of the Connecticut General Statutes (C.G.S.) provides for grants to schools that participate in the SBP and meet the definition of a severe need school. "Severe need school" means a school in which 1) the school is participating, or is about to participate, in a breakfast program; and 2) 20 percent or more of the lunches served to students at the school in the fiscal year, two years prior to the grant year, were served free or at a reduced price.

The amount of School Breakfast Grant Program funds is authorized in each fiscal year within available appropriations. Within the limits of available funds, eligible local or regional boards of education are entitled to \$3,000 for each severe need school in the school district that provides a SBP. Funding may vary slightly each year, depending on the number of eligible SBP sites.

School Breakfast Grant Program funds are distributed in the same manner as state match funds for the NSLP. Participating districts receive one payment in October. School Breakfast Grant Program funds must accrue to the NSFSA.

## 3 | Federal and State Funding

#### **Healthy Food Certification (HFC) Funding**

HFC under C.G.S. Section 10-215f requires that each BOE or governing authority for all public schools participating in the NSLP must certify annually to the CSDE whether the district will follow the Connecticut Nutrition Standards (CNS) for all foods sold to students separately from reimbursable school meals.

Districts that choose to follow the CNS receive an additional 10 cents per lunch (within available appropriations), based on the total number of reimbursable lunches (paid, free, and reduced) served in the district in the prior school year for the NSLP. This includes lunches served in the SSO and Head Start Programs operated by the BOE and participating in the NSLP.

The amount of HFC funds is authorized in each fiscal year within available appropriations. Funding may vary slightly each year depending on the number of HFC districts.

For more information, visit the CSDE's HFC webpage.

#### **USDA** Foods

The CSDE manages the USDA Foods Program for schools in Connecticut. The CSDE's role is to help SFAs obtain USDA purchased commodity foods. SFAs receive an annual Planned Assistance Level (PAL) based on the number of reimbursable lunches served in the previous school year (July 1 through June 30) multiplied by the federal meal rate. The federal meal rate for USDA Foods changes each July. The current meal rate for USDA Foods is included in the CSDE's reimbursement rates memo for the current school year, which is available on the CSDE's Reimbursement Rates for Child Nutrition Programs webpage.

Each SFA decides how to use their PAL budget. USDA Foods are available to schools in several ways, including Direct Delivery USDA Foods, Further Processed USDA Foods, the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program, the Fresh Fruit and Vegetable Program Pilot, and the SFSP USDA DoD Pilot.

Every dollar's worth of USDA Foods used in school menus frees up money that could otherwise be spent on commercial food purchases. Proper procurement, use, and management of USDA Foods optimizes the financial support provided by the USDA for the school nutrition programs and is monitored during the CSDE's Administrative and Procurement Reviews.

#### How to Check Funding Status of Federal and State Reimbursements

SFAs can check the status of Child Nutrition Program funds on the CSDE's Bureau of Grants Management Grant Payment Report webpage.

- 1. Go to https://www.csde.state.ct.us/public/dgm/grantreports1/PayDetlMain.aspx.
- 2. **Section A:** Select the year. The default selection is the current year.
- 3. **Section B:** Choose the report type. The default selection is "Detail."
- 4. Section C: Vendor:
  - Public schools: Select your district from the dropdown under "Towns, Regions, RESCs and Charters."
  - Private schools and residential child care institutions (RCCIs): Select your school or institution from the dropdown under "All Others."
- 5. Section D: Grant Type: Select School Lunch.
- 6. Click **Submit**. All payments made to the district will be listed.

The figure below shows the selection options on the Grant Payment Report webpage.

FY 2022 Grant Payment Report data last updated: 4/13/2022 Main Page Grants Home Grant Reports Send E-Mail 2021-2022 🕶 Section A: Select Year Detail O Summary O Statewide Summary O Statewide Vendor Summary Section B: Report Type O Statewide SPID Summary O SPID Detail by Vendor O SPID Summary by Vendor Quarterly Grant Summary O Fund Summary by Vendor Refunds Exceed Payments O Refunds NOT Included O All Current Year Refunds O Pivot Reports: Select Report From List Below Section C: Vendor Towns, Regions, RESCs and Charters O All Others All Towns, Regions, RESCs and Charters ~ Vendor Name Contains | get vendors O Vendor Group 1 -PK-12 Districts Section D: Grant Type Select Below O State and Federal Education Grants O State Special Ed O Child Care O School Lunch O Summer Food School Construction O School Construction Progress Payments O Bond Funds (excluding Schl Construction) Section E: Invoice # All Invoices (date #: invoice number) ▼ ONLY Item C applies. Invoice # Contains get invoices Summary by Invoice Date:

Reset

Submit

Figure 1. CSDE's Grant Payment Report webpage

# 4 — Acronyms and Glossary

AR Administrative Review

**ASP** Afterschool Snack Program of the NSLP

BOE board of education

C.G.S. Connecticut General Statutes

**CFR** Code of Federal Regulations

CNS Connecticut Nutrition Standards

**CSDE** Connecticut State Department of Education

**FBG** Food Buying Guide for Child Nutrition Programs (USDA)

FDP Food Distribution Program

**FNS** Food and Nutrition Service, U.S. Department of Agriculture

GAAP Generally Accepted Accounting Principles

**HFC** Healthy Food Certification

LEA local educational agency

NCR net cash resources

**NSFSA** nonprofit school foodservice account

**NSLP** National School Lunch Program

PLE Paid Lunch Equity

POS point of service

**RCCI** residential child care institution

SBP School Breakfast Program

SFA school food authority

SSO Seamless Summer Option of the NSLP

**USDA** U.S. Department of Agriculture

## 4 Acronyms and Glossary

a la carte: Foods and beverages that are priced and sold separately from reimbursable meals.

**Administrative Review (AR):** The state agency's comprehensive offsite and onsite evaluation of all SFAs participating in the NSLP and SBP. The review cycle is every three years for each SFA and includes a review of critical and general areas. For more information, visit the CSDE's Administrative Review for School Nutrition Programs webpage.

**adult meal pricing:** The price charged to adults who purchase a meal at a site participating in the NSLP or SBP.

Afterschool Snack Program (ASP): The USDA's federally assisted snack program implemented through the National School Lunch Program (NSLP). The ASP provides cash reimbursement to help schools serve snacks to children in afterschool activities aimed at promoting the health and well-being of children and youth. Schools must provide children with regularly scheduled activities in an organized, structured, and supervised environment that includes educational or enrichment activities, e.g., mentoring/tutoring programs. Programs must meet state or local licensing requirements and health and safety standards. For more information, visit the CSDE's Afterschool Snack Program webpage.

**Code of Federal Regulations (CFR):** The codification of the general and permanent rules published in the Federal Register by the Executive departments and agencies of the Federal government.

**food service management company (FSMC):** A commercial enterprise or a nonprofit organization that is or may be contracted with by the SFA to manage any aspect of the school food service. For more information, visit the CSDE's Food Service Management Company webpage.

Generally Accepted Accounting Principles (GAAP). The accounting profession's rules for capturing, analyzing, recording, summarizing, interpreting, and reporting financial information about an entity, such as a school district. For more information, refer to Appendix E of the USDA's manual, *Indirect Costs: Guidance for State Agencies & School Food Authorities*.

indirect costs: Costs incurred for the benefit of multiple programs, functions, or other cost objectives that cannot be identified with a particular program or other cost objective. Indirect costs typically support administrative overhead functions such as fringe benefits, accounting, payroll, purchasing, facilities management, and utilities. For more information, refer to the USDA's manual, *Indirect Costs: Guidance for State Agencies & School Food Authorities*.

**local educational agency (LEA)**: A public board of education or other public or private nonprofit authority legally constituted within a state for either administrative control or direction of, or to perform a service function for, public or private nonprofit elementary schools or secondary schools in a city, county, township, school district, or other political subdivision of a state, or for a combination of school districts or counties that is recognized in a state as an administrative agency

## 4 Acronyms and Glossary

for its public or private nonprofit elementary schools or secondary schools. The term also includes any other public or private nonprofit institution or agency having administrative control and direction of a public or private nonprofit elementary school or secondary school, including residential child care institutions, Bureau of Indian Affairs schools, and educational service agencies and consortia of those agencies, as well as the state educational agency in a state or territory in which the state educational agency is the sole educational agency for all public or private nonprofit schools.

National School Lunch Program (NSLP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The NSLP provides nutritionally balanced, low-cost, or free lunches to children each school day. The NSLP was established under the National School Lunch Act, signed by President Harry Truman in 1946. For more information, visit the CSDE's National School Lunch Program webpage.

net cash resources: All monies, as determined in accordance with the state agency's established accounting system, that are available to or have accrued to a SFA's nonprofit school food service at any given time, less cash payable. Such monies may include, but are not limited to, cash on hand, cash receivable, earnings on investments, cash on deposit and the value of stocks, bonds, or other negotiable securities.

**nonprofit school food service**: All food service operations conducted by the school food authority principally for the benefit of schoolchildren, all the revenue from which is used solely for the operation or improvement of such food services.

**nonprogram foods:** Any nonreimbursable foods and beverages purchased using funds from the NSFSA. This encompasses all foods sold in schools such as a la carte items (e.g., juice, entrées, and snack foods), adult meals, foods sold outside of school hours, and any foods used for catering or vending activities. For most SFAs, a la carte foods offered during meal service account for the largest share of nonprogram foods.

**Paid Lunch Equity (PLE):** The process to ensure that the revenue or income from students' free and reduced-price lunches is equitable to the income from students' paid lunches. For more information, visit the "Paid Lunch Equity" section of the CSDE's Financial Management for School Nutrition Programs webpage.

paid meals: Meals served to students who are not eligible for free or reduced-price lunches.

**reduced-price meals:** Meals served to reduced-eligible children in the NSLP or SBP that are less than the full-price meal. The maximum charge for a reduced-price meal is 40 cents for lunch, 30 cents for a breakfast, and 15 cents for ASP snack.

reimbursement rates: The amount of funding paid by the USDA for each meal type (free, reduced, and paid). Rates are updated and published in the Federal Register each year. The current reimbursement rates are available on the CSDE's Reimbursement Rates for Child Nutrition Programs webpage.

## 4 Acronyms and Glossary

**school food authority (SFA):** The governing body that is responsible for the administration of one or more schools and has the legal authority to operate the USDA's school nutrition programs.

School Breakfast Program (SBP): The USDA's federally assisted meal program operating in public and nonprofit private schools and residential child care institutions. The SBP provides nutritionally balanced, low-cost, or free breakfasts to children each school day. The SBP was established under the Child Nutrition Act of 1966 to ensure that all children have access to a healthy breakfast at school to promote learning readiness and healthy eating behaviors. For more information, visit the CSDE's School Breakfast Program webpage.

school nutrition programs: The USDA's school nutrition programs include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP) of the NSLP, Seamless Summer Option (SSO) of the NSLP, Special Milk Program (SMP), Fresh Fruit and Vegetable Program (FFVP), and Child and Adult Care Food Program (CACFP) At-risk Supper Program implemented in schools. For more information, visit the CSDE's School Nutrition Programs webpage.

Seamless Summer Option of the NSLP (SSO): The USDA's federally assisted summer meals program that combines features of the NSLP, SBP, and the Summer Food Service Program (SFSP), and serves meals free of charge to children ages 18 and younger from low-income areas. School districts participating in the NSLP or SBP are eligible to apply to the CSDE to participate in the SSO. SSO meals follow the NSLP and SBP meal patterns. For more information, visit the Seamless Summer Option of the NSLP webpage.

**Special Milk Program (SMP):** The USDA's federally assisted program that provides milk to children in schools and child care institutions that do not participate in other federal meal service programs. The SMP reimburses schools for the milk they serve. Schools in the NSLP or SBP may also participate in the SMP to provide milk to children in half-day pre-kindergarten and kindergarten programs where children do not have access to the school meal programs. For more information, visit the CSDE's Special Milk Program webpage.

three-month operating balance: The amount needed to operate the school nutrition programs for three months. The three-month operating balance is calculated by dividing the SFA's total annual expenditures by the number of operating months and multiplying this number by three.

**USDA Foods:** Foods available to the USDA Child Nutrition Programs through the CSDE's Food Distribution Program. USDA Foods are available to schools in several ways, including Direct Delivery USDA Foods, Further Processed USDA Foods, the USDA Department of Defense (DoD) Fresh Fruit and Vegetable Program, the Fresh Fruit and Vegetable Program Pilot, and the SFSP USDA DoD Pilot. For more information, visit the USDA's USDA Foods Programs webpage and the CSDE's Food Distribution Program webpage.