

# RCCI & Private Schools

---

**Marianna Chauvin**

Director of School Support

[mdek12.org](https://mdek12.org)



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION

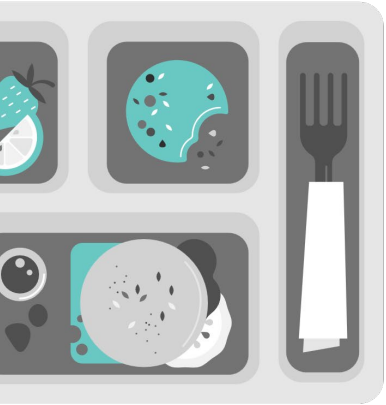
July 2023



# Meal Count Systems

## Acceptable Meal Count Systems

- Electronic POS
- Student Rosters
- Must be able to perform an edit check
- Must record each day, each meal, which child received a meal

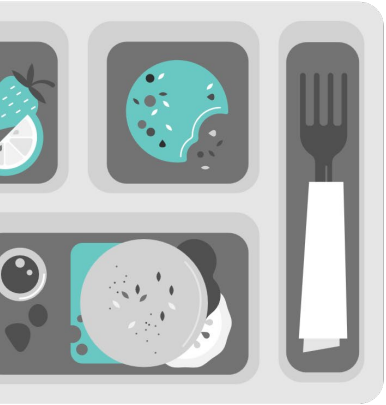


# Meal Count Systems

---

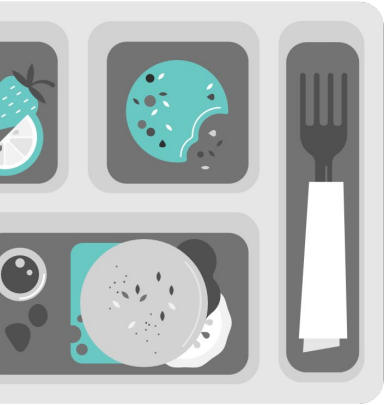
## Unacceptable Meal Count Systems

- Head Counts
- Classroom Counts
- Clickers



## Whole Grain Rich

- 80% of what you serve must be WGR
- Be wary of products purchased from grocery stores or big box stores!
- Know how to read nutrition labels to identify products

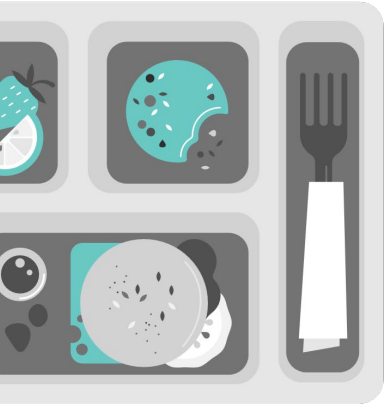


# MRS recipes

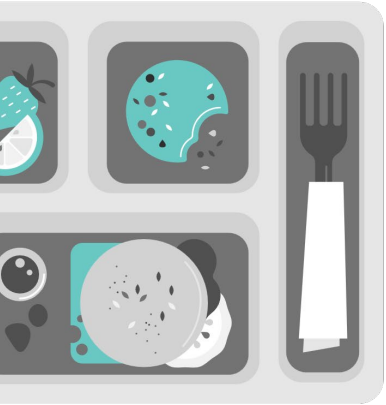
---

Make sure you are using the most current

- Reprint recipes after every MRS update



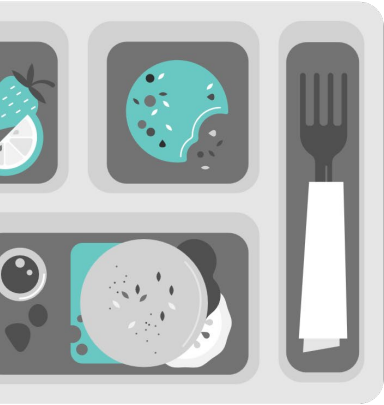
## LSWP



- Required to have a health council and a LSWP that meets federal requirements
- NOT required to meet state requirements unless accredited through MDE
- Can have a much shorter wellness policy than those required by public school districts
- Abbreviated template available from State Agency (ask your PS)

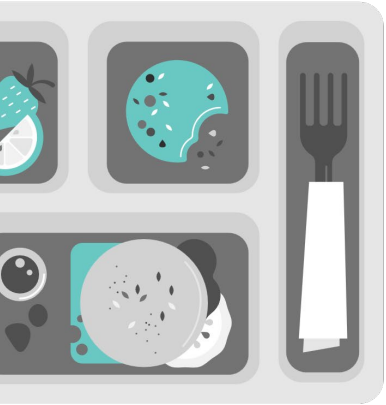
## Required Elements

- Specific goals for nutrition promotion and education, physical activity, other activities to promote wellness;
- Standards & nutrition guidelines for all food/beverages on campus during school day (provided and sold), Smart Snack comp;
- Identification of LEA officials responsible for implementation/oversight;
- description of how stakeholders provided opportunity to participate;
- policies that allow marketing of only compliant products;
- review and consider evidence-based strategies in determining school wellness goals;
- involve, inform, and update the public;
- conduct an assessment every 3 years;
- update/modify program as appropriate;



## Must Self-Assess your LSWP periodically

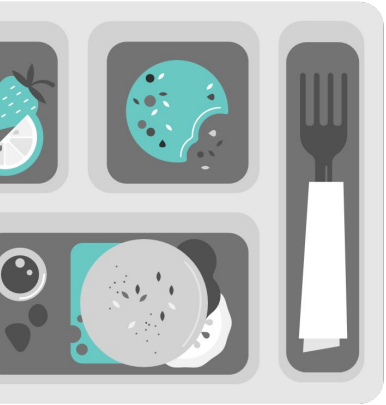
- Must assess wellness policy every 3 years
- Only required to assess wellness policy every year if accredited by MDE
- Template available on MDE website





## Required to have the following individuals

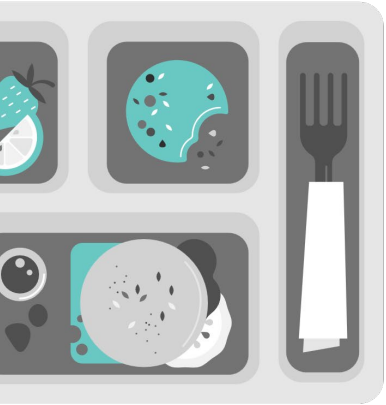
- parents
- students
- representatives of the school food authority
- teachers of physical education (best equivalent)
- school health professionals (best equivalent)
- the school board (or equivalent)
- school administrators (or equivalent)
- general public



# Advertising your program

## Can be tricky for RCCIs

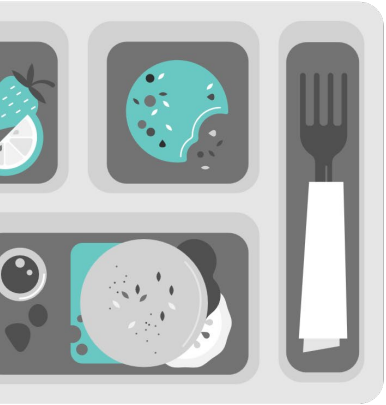
- Should provide information about meal benefits upon entry into the program
- How are you promoting breakfast?
- Not required to post on website



# Advertising SFSP in your area

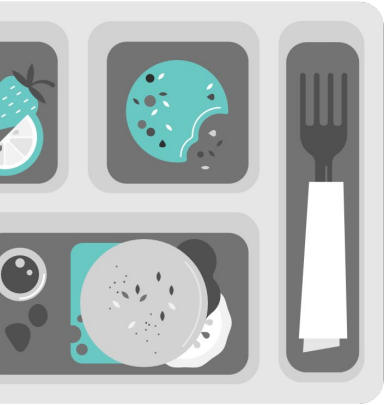
## Required of all orgs that operate NSLP

- still required to advertise SFSP, even if you don't provide it
- Reach out to SA for some standard language on promoting the USDA site finder



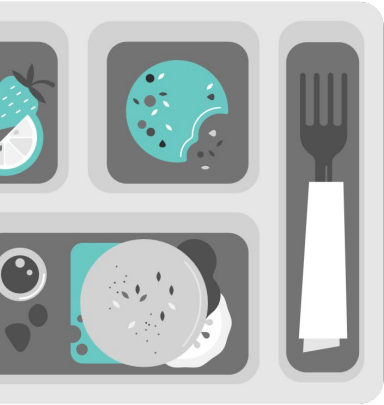
## Are you eligible to participate?

- Eligible Activity
- Cannot claim when school is NOT in session (should not be claiming during summer months)



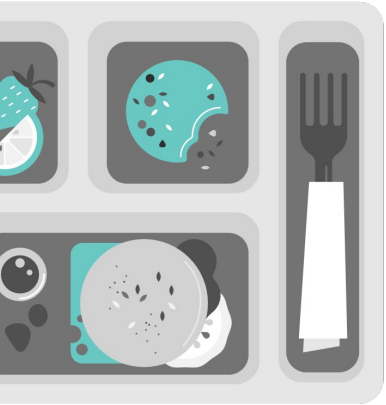
## NO EXCEPTIONS

- Still subject to these federal requirements
- All food served on campus during the school day must be smart snack compliant
- Vending machines should be time gated
- No exempt fundraisers



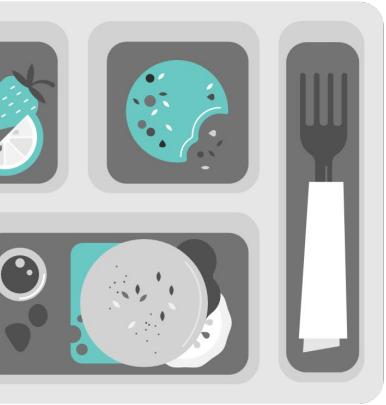
## May not apply to you

- This is an MDE Board Policy
- If you are not accredited by MDE you are not subject to this policy
- Although the SA highly encourages you to adopt this policy as a best practice



## Does lunch meal have to be 24 minutes?

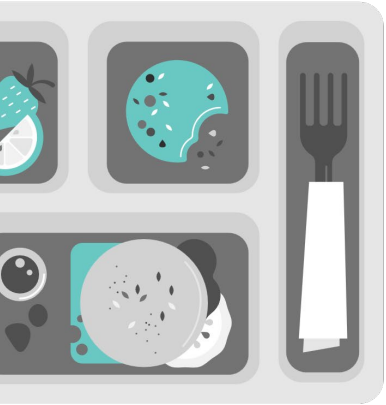
- This is an MDE Board Policy
- If you are not accredited by MDE you are not subject to this policy
- Although the SA highly encourages you to adopt this policy as a best practice



# Separate NPSFSA

## Non Profit School Food Service Account

- Not required to follow the MDE accounting manual
- But you ARE required to have a separate bank account for your CN program
- We need to clearly see debits and credits during an audit or procurement review
- Follow GAAP (generally accepted accounting principles)

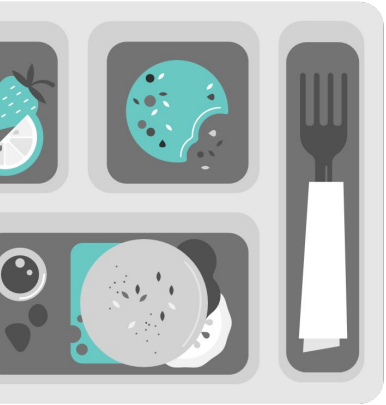




# Family Style Meals

allowed

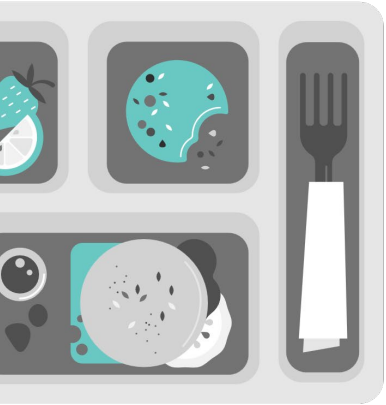
- Must have staff trained in identification of reimbursable meals



# Meal Accommodations

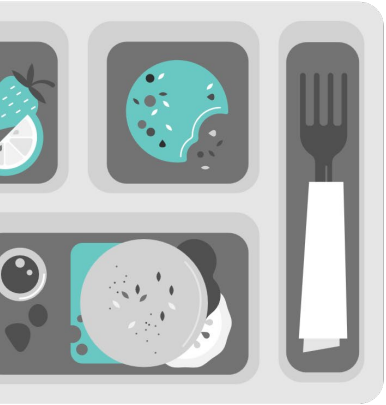
## Same Rules apply for all schools

- Must maintain documentation of physician statements



## Exclusively for use in CNPs

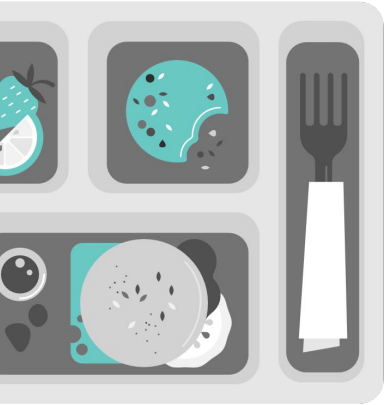
- Any commodity food you receive **MUST** be used in the CNPs
- Should not be using commodity for supper meals, catered events



# Annual Monitoring

## Typically Required to be completed by Feb 1

- Single Sites exempt from NSLP/SBP monitoring requirements
- ASCP monitoring must be performed twice a year
  - First 4 weeks of operation (year round program, this would be in July)
  - Second time before the end of operations for the program year



Remember, you CAN'T operate ASCP if there is no school/instruction offered

# RCCI

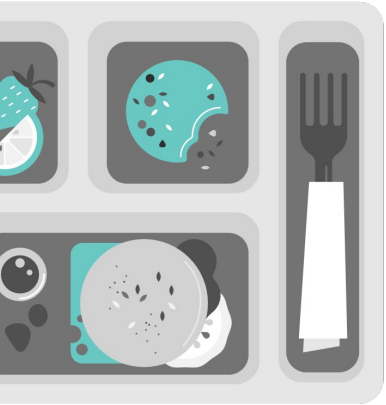
---

Following slides are specific to RCCI

# RCCI - Licensure Required

## Must provide copy of license annually to SA

any public or nonprofit private residential child care institution, or distinct part of such institution, which operates principally for the care of children, and, if private, **is licensed to provide residential child care services under the appropriate licensing code by the State or a subordinate level of government**, *except for* residential summer camps which participate in the Summer Food Service Program for Children, Job Corps centers funded by the Department of Labor, and private foster homes. The term “residential child care institutions” includes, but is not limited to: homes for the mentally, emotionally or physically impaired, and unmarried mothers and their infants; group homes; halfway houses; orphanages; temporary shelters for abused children and for runaway children; long-term care facilities for chronically ill children; and juvenile detention centers. A long-term care facility is a hospital, skilled nursing facility, intermediate care facility, or distinct part thereof, which is intended for the care of children confined for 30 days or more.

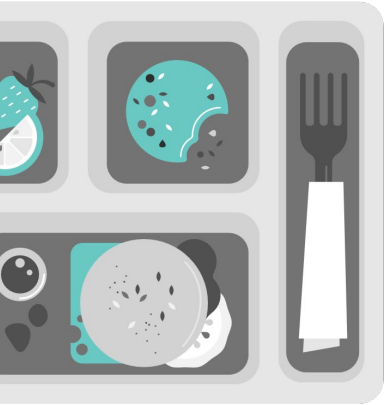


# Age Grade Group Exemptions

## RCCLs only

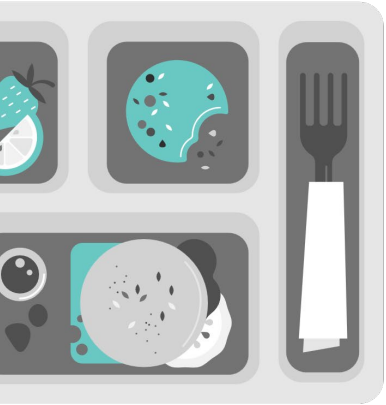
- Can serve one meal pattern IF
  - Consist of one or more age/grade groups
  - Have legitimate safety concerns
  - Has approval from the SA

Should follow highest age/grade group represented to ensure nutritional adequacy



## RCCIs

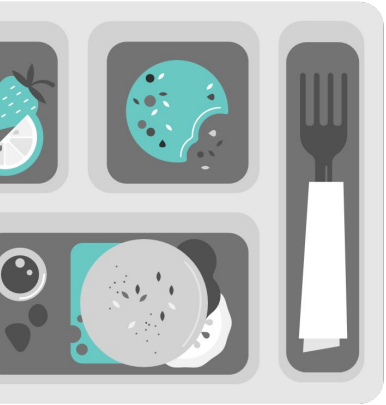
- RCCIs cannot participate in the SFSP
- RCCIs should provide NSLP/SBP on a year round schedule
- ASCP can only be reimbursed on days when educational enrichment is provided after school





## Must be implemented for HS unless you have a 12 (I) waiver from USDA

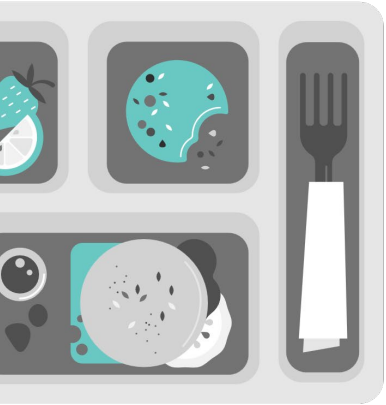
- USDA does not provide a blanket waiver for this, even if you are an RCCI and you serve a unique population (such as juvenile detention)
- Reach out to your Program Specialist if you are a Juvenile detention facility and want to pursue a waiver from OVS requirements for your HS students



# Meal Applications and Verification

## Required for RCCI with day Students

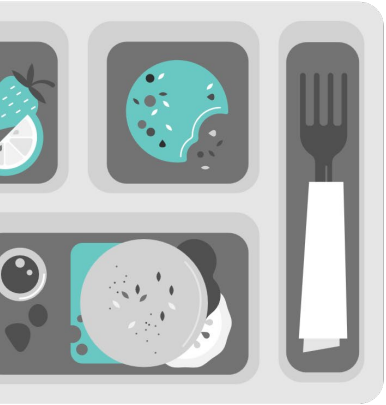
- If the RCCI has no day students, meal apps and verification are not required



# What is a Day Student

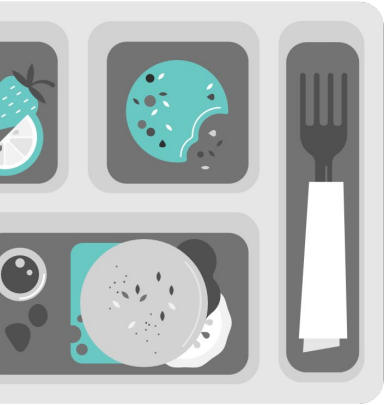
## How do I know if the "Day Student" Rules apply to me?

- Day Student: child who does not reside at the RCCI, but comes on the RCCI campus during the day to receive services.
- Day student does NOT mean a child who resides at the RCCI, but goes to another LEA to receive educational instruction during the day.



## Common misconception

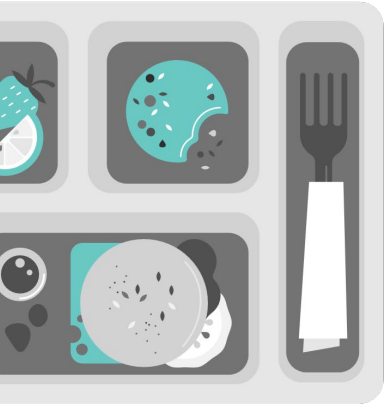
- There is a common misunderstanding regarding the eligibility for FREE meals/milk in RCCIs.
- Children residing in RCCIs are not automatically eligible for FREE meals.
- A determination of FREE, REDUCED, or PAID must be made.



# Determining Eligibility For Institutionalized Child

## Such as those residing in an RCCI

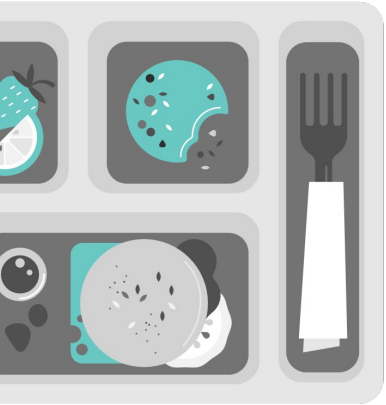
- An institutionalized child is **considered as a one-person household** since he/she is not living with his/her actual family as an economic unit.
- The RCCI need not obtain an application or signature from an adult household member.
- Since an institutionalized child is defined as a family of one, program eligibility for institutionalized children is based on income received by the child; the family's income is not included.
- Payments from any source directly received by the institution on a child's behalf are not considered as income to the child.
- Only the income a child earns from employment and/or personally receives while in residence at the institution is considered as income.
- Acceptable form of documenting free eligibility - Eligibility Roster (record eligibility determinations, by child, on a roster)



# Determining Eligibility For Day Student

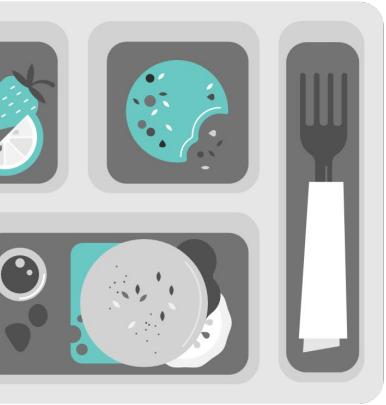
Such as those coming on RCCI campus during the day

- Must determine eligibility!
  - Meal application (prototype application available from USDA or SA)
  - Categorical eligibility (ex. SNAP, TANF)



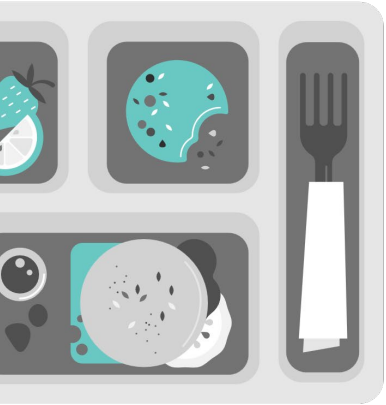
## Do I have to conduct verification?

- Not required for Institutionalized Students
- Required for Day Students
  - Even if you received copies of the meal application / determination from another LEA



## Now What?

- Can we accept the eligibility determination made by another LEA for our day students?
  - Yes, you can request a copy of the free/red price meal application from another LEA
  - If an application is not available for the current year, the RCCI must distribute, process, and determine their own meal application
- How should we set meal prices for day students?
  - Can use the PLE tool, but must set a price for paid and reduced students in accordance with federal regs
  - Would have to have a mechanism to charge and collect payments for reduced or paid meals from Day Students







# Marianna Chauvin

Director of School Support

[mchauvin@mdek12.org](mailto:mchauvin@mdek12.org)

[mdek12.org](https://mdek12.org)



MISSISSIPPI  
DEPARTMENT OF  
EDUCATION




This institution is an equal opportunity provider.

Full Non-Discrimination Statement link:



**USDA** United States Department of Agriculture



## AND JUSTICE FOR ALL

In accordance with Federal 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, age, disability, and reprisal or retaliation for prior civil rights activity. (Not all prohibited bases apply to all programs.)

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, and 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.asec.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17FacMail.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:

mail:  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or  
fax:  
(800) 256-1065 or (202) 690-7442;  
email:  
program.intake@usda.gov.

This institution is an equal opportunity provider.

Form AD-3027 - Revised March 4 Revised September 2016

**C**onforme a la ley federal y las políticas y regulaciones de derechos civiles del Departamento de Agricultura de los Estados Unidos (USDA), esta institución tiene prohibido discriminar por motivos de raza, color, origen nacional, sexo, edad, discapacidad, venganza o represalia por actividades realizadas en el pasado relacionadas con los derechos civiles (no todos los principios de prohibición aplican a todos los programas).

La información del programa puede estar disponible en otros idiomas además del inglés. Las personas con discapacidades que requieran medios de comunicación alternativos para obtener información sobre el programa (por ejemplo, Braille, letra grande, grabación de audio y lenguaje de señas americano) deben comunicarse con la agencia estatal o local responsable que administra el programa o con el TARGET Center del USDA al (202) 720-2600 (voz y TTY) o comunicarse con el USDA a través del Servicio Federal de Transmisión de Información al (800) 877-8339.

Para presentar una queja por discriminación en el programa, el reclamante debe completar un formulario AD-3027, Formulario de queja por discriminación del programa del USDA, que se puede obtener en línea, en <https://www.asec.usda.gov/sites/default/files/USDA-OASCR%20P-Complaint-Form-0508-0002-508-11-28-17FacMail.pdf>, en cualquier oficina del USDA, llamando al (866) 632-9992, o escribiendo una carta dirigida al USDA. La carta debe contener el nombre, la dirección y el número de teléfono del reclamante, y una descripción escrita de la supuesta acción discriminatoria con suficiente detalle para informar al Subsecretario de Derechos Civiles (ASCR, por sus siglas en inglés) sobre la naturaleza y la fecha de la presunta violación de los derechos civiles. La carta o el formulario AD-3027 completado debe enviarse al USDA por medio de:

correo postal:  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; o  
fax:  
(800) 256-1065 o (202) 690-7442;  
correo electrónico:  
program.intake@usda.gov.

Esta institución ofrece igualdad de oportunidades.