

# *OSPI School Meal Programs Resource Guide*

## Operating the School Meal Programs in Residential Child Care Institutions (RCCI)

The United States Department of Agriculture (USDA) Child Nutrition Programs are available for Residential Child Care Institutions (RCCI) and may participate in National School Lunch Program (NSLP), School Breakfast Program (SBP), Special Milk Program (SMP), and/or Afterschool Snack Program (ASP). RCCI must comply with all USDA Child Nutrition Programs regulations as outlined in 7 CFR 210 & 7 CFR 220; however, areas of compliance may be different than a traditional Local Education Agency (LEA).

### Definitions

- **Public Institution:** an institution operated by and primarily responsible to any level of federal, state or local government.
- **Private, Non-Profit Institution:** an institution that is not public and is tax-exempt for federal income tax as described above.
- **Day Students:** children attending but not residing in an RCCI.
- **Non-Day Students:** children residing in an RCCI.

### Eligibility Requirements

- RCCIs can participate in the School Meal Programs provided that the institution:
  - Is public or non-profit private.
    - If private, is tax exempt under Section 501(c)(3) of the Internal Revenue Code of 1986 and licensed by the state to provide residential childcare.
  - Operates principally for the care of children.
  - Is a residential facility.
  - Primarily serves the age group of 21 and under.
- Children residing in a RCCI are considered a household of one and are automatically eligible for free meals.
  - Exception: If the child is earning income personally while in residence, this income must be considered and used to determine eligibility for free or reduced-price meals.
- Day students, who do not reside at the RCCI, must be determined eligible for free or reduced-price school meals based on an application, direct certification, or other eligibility benefits, and claimed in their corresponding eligibility category.
  - If eligibility documentation is not collected from day students, all day students must be claimed in the paid category.



## Program Requirements

- [Income Policy Statement](#) must be submitted to document whether children have income, how much, and how the money is accounted for.
- [Child Nutrition Financial Report](#) (CNFR) must be submitted in the Washington Integrated Nutrition System (WINS) by December 31 annually.
- RCCIs with Non-Day Students and RCCIs with Day Students that are non-pricing and not obtaining eligibility information are exempt from:
  - Child Nutrition Eligibility & Education Benefit (CNEEB) applications
  - Direct Certification (DC)
  - Verification
  - Public Release
  - Paid Lunch Equity Tool
  - Unpaid Meal Charge Policy

## Meal Pattern & Menu Planning

- RCCIs can claim meals in the NSLP and SBP on any day that students are present and receiving meals, including weekends.
  - Follow the [7-day Meal Pattern for Breakfast and Lunch](#) (if operating 7-days per week).
- RCCIs may implement one of the below meal pattern flexibilities if there are legitimate safety concerns. Meal pattern flexibilities must be approved by OSPI.
  - **Age/Grade Group Exemption:** May follow the meal pattern requirements for the highest age/grade group (K–5, 6–8, 9–12) served at the site.
  - **Milk Variety Exemption:** May meet the milk variety requirement over the course of the week rather than daily.
  - **Offer vs Serve (OVS) Exemption:** May implement a serve only meal service style for all age/grade groups.
- RCCIs must maintain production records to record all breakfast, lunch, and snack items planned and served.
  - [Production Record Reference Sheet](#)

## Other Program Requirements

- **Application Renewal**  
RCCIs participating in the NSLP and/or SBP must complete and return an application packet.  
**Due:** Annually by September 1  
**Tools:** [National School Lunch and Breakfast Program Bulletins](#)  
[National School Lunch and Breakfast Program Communications and Updates](#)

- **Buy American Provision**

RCCIs participating in the NSLP and/or SBP must purchase domestic commodities and products to the maximum extent practicable. Periodic reviews of stock on hand must be conducted to ensure compliance with the Buy American Provision.

**Due:** Ongoing

**Tools:** [Buy American Provision Reference Sheet](#)

- **Civil Rights**

RCCIs must administer program services and benefits in accordance with all laws, regulations, instructions, policies, and guidance related to nondiscrimination in program delivery. A Civil Rights Complaint Procedure and Log specific to the USDA Child Nutrition Programs must be maintained. Any staff, including supervisory staff, interacting with program applicants or participants must receive training.

**Due:** Ongoing with training completed annually

**Tools:** [Civil Rights Reference Sheet](#)

[Civil Rights Training](#) (Create a free Canvas account to access the training)

- **Claims for Reimbursement**

RCCIs must submit meal counts of students participating in School Meal Programs to claim applicable State and Federal reimbursements. Claim data is entered in WINS.

**Due:** Monthly

**Tools:** [Claims Reference Sheet](#)

- **Food Safety Inspections**

RCCIs must have two food safety inspections conducted at each site that prepares and/or serves meals. If two inspections do not take place, the LEA must document that a second inspection was requested. The most recent food safety inspection must be posted in a publicly visible location.

**Due:** Twice annually (conducted by state, county, or local health departments)

**Tools:** [Food Safety Inspection Reference Sheet](#)

- **Food Safety Program**

RCCIs must have a Food Safety Program that addresses food safety in all aspects of meal preparation and service and is based on the HACCP principles.

**Due:** Ongoing

**Tools:** [School Food Safety Program Reference Sheet](#)

- **Milk & Milk Substitutes**

RCCIs must inform OSPI Child Nutrition if they plan to provide a milk substitute other than for children with a documented medical need.

**Due:** As needed

**Tools:** [Milk & Milk Substitutes Reference Sheet](#)

[Approved Milk Substitutes Handout](#)

## Milk Substitute Notification Form

- **October Building Data**

RCCIs must report the number of children eligible for free, reduced-price, and paid meals with access to the School Meal Programs as of the last operating day in October. Data is reported by site in WINS on the October claim for reimbursement.

**Due:** Annually by December 30

**Tools:** [October Building Data Reference Sheet](#)

- **On-Site School Reviews**

RCCIs that operate NSLP/SBP and serve meals at more than one site are required to conduct an on-site review of each school or site. All sites operating NSLP must be reviewed and half of sites operating SBP must be reviewed annually. The purpose of the review is to evaluate counting and claiming procedures

**Due:** Annually by February 1

**Tools:** [On-Site Reviews Reference Sheet](#)  
[On-Site Review Form](#)

- **Point-of-Service Meal Count**

Meals must be counted daily at the point in the food service line where it can be accurately determined by an adult that a reimbursable meal has been served to an eligible child.

**Due:** Ongoing

**Tools:** [Point-of-Service Meal Counting Reference Sheet](#)

- **Procurement**

RCCIs using Federal funds must follow federal, state, and local procurement guidelines. Procurement is the process of purchasing goods and services, which involves planning, drafting specifications, bid advertisement, and awarding and managing the contract.

**Due:** Ongoing

**Tools:** [Procurement Reference Sheet](#)  
[Child Nutrition Services Procurement](#)

- **Professional Standards for School Nutrition Employees**

RCCIs operating the NSLP must ensure the minimum education standards are met when hiring a Food Service Director and that annual training requirements are met for all school nutrition employees.

**Due:** Ongoing

**Tools:** [Professional Standards Reference Sheet](#)  
[Professional Standards Learning Objectives](#)  
[USDA Professional Standards](#)

- **Record Retention**

Child Nutrition Program records must be retained for a minimum of three years plus the current year or until the resolution of an audit. Retention requirements at the state or local level must also be followed.

**Due:** Ongoing

- **Wellness Policy**

RCCIs participating in NSLP must establish and implement a wellness policy for all sites under its jurisdiction that meets minimum standards designed to create a healthy environment and promote wellness among children, staff, and families. Stakeholders must be invited to participate in the review and updating of the wellness policy and an assessment of the sites' compliance with the wellness policy must be conducted once every three years.

**Due:** Ongoing with an assessment conducted every three years

**Tools:** [Wellness Policy Reference Sheet](#)  
[USDA Wellness Policy Tools & Resources](#)

## If Applicable:

- **Afterschool Snack Program Reviews**

RCCIs that operate the Afterschool Snack Program through the NSLP must review each snack site twice annually. Snacks can be claimed under the Afterschool Snack Program on school days (excluding weekends), provided an enrichment activity is offered during snack time.

**Due:** Twice annually with the first review occurring in the first four weeks of operation

**Tools:** [Afterschool Snack Program Review Form](#)  
[Afterschool Snack Program](#)

- **School Breakfast Program and Summer Meals Promotion**

RCCIs with day students must inform families of the availability of breakfast and advertise where summer meals can be accessed.

**Due:** Prior to and throughout the school year

**Tools:** [School Breakfast Program Reference Sheet](#)  
[Summer Outreach Reference Sheet](#)

- **Storage Facility Self-Evaluation**

RCCIs must review all facilities in which USDA foods are stored, including commercial storage facilities that store USDA foods for the RCCI.

**Due:** Annually by February 1

**Tools:** [Storage Facility Review Reference Sheet](#)  
[Storage Facility Self-Evaluation Form](#)

## References

- [7 CFR 210](#)
- [7 CFR 220](#)

## Acronym Reference

- ASP – Afterschool Snack Program
- CNP – Child Nutrition Programs
- HACCP – Hazard Analysis Critical Control Points
- LEA – Local Education Agency
- NSLP – National School Lunch Program
- OSPI – Office of Superintendent of Public Instruction
- RCCI – Residential Child Care Institute
- SBP – School Breakfast Program
- USDA – U.S Department of Agriculture
- WINS – Washington Integrated Nutrition System