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DEPARTMENT OF EDUCATION
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FOOD SERVICE

**ADMINISTRATIVE MEMO NO. 9
SCHOOL YEAR 2017-2018**

SUBJECT: Claiming Preschool Children under the National School Lunch and School Breakfast Programs versus the Child and Adult Care Food Program for School Food Authorities (SFAs)

DATE: April 12, 2018

The purpose of this memorandum is to clarify when it is appropriate for a School Food Authority (SFA) to claim meals served to preschool children under the National School Lunch Program (NSLP)/School Breakfast Program (SBP) versus the Child and Adult Care Food Program (CACFP).

An SFA, approved to participate in the NSLP/SBP, is eligible to claim meals served to preschool children in the NSLP/SBP only when the following criteria are met:

1. The preschool children must be enrolled and in regular daily attendance at the approved school building where meals are served and claimed.
2. The preschool program (including Head Start, Great Start Readiness Program (GSRP), At-Risk, etc.) must be operated as an administrative unit of the school district. The school district, is in fact, the administrative agency for the preschool program.

Children enrolled in programs that are administrated by a non-profit agency (such as Head Start, a Community Service Agency, etc.,) that are housed in a school district building (the school district provides a classroom), CANNOT be claimed under the SBP or the NSLP. These children must be claimed under the CACFP. The school food service program, however, may continue to prepare and sell meals (act as a vendor) to the non-profit preschool CACFP sponsor.

Great Start Readiness Programs

For the GSRP programs housed within the school district (classroom provided), the snack served to children cannot be claimed under the NSLP/SBP. Therefore, the SFA must either receive a waiver from GSRP to cover the cost of the snack or claim the snack under CACFP.

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Meals provided by the SFA for paid students in the GSRP program must not be charged at a rate higher than the approved Board of Education breakfast and lunch paid meal price. GSRP reduced eligible reimbursable meals claimed by a SFA must not be charged more than \$.30 for breakfast and \$.40 for lunch. As adult meals cannot be subsidized with federal funds, teachers and other staff members must be charged a higher price than students, even if the meal is the same. For further information on the pricing requirements for adult meals, refer to MDE's "[Menu, Adult, and Ala Carte Pricing Worksheet](#)".ⁱ GSRP student meals that are not claimed by the SFA under either the NSLP/SBP or CACFP must be billed at the applicable free reimbursement rate plus the commodity entitlement value/cash in lieu.

Preschool Meal Pattern Requirements

Schools serving meals to infants and children ages 1 through 4 years old (preschoolers, Pre-K) must comply with the updated CACFP meal pattern requirements as of October 1, 2017. The updated meal pattern requirements are located on the [USDA CACFP Nutrient Standards webpage](#).ⁱⁱ

The preschool meal pattern was developed to best address the nutritional needs of young children. One of the goals of United States Department of Agriculture's (USDA) child nutrition programs is to expose young children to a variety of foods before their food preferences are developed to help children learn healthy eating habits early in life. The updated CACFP meal pattern is like the NSLP/SBP meal patterns in that it offers more vegetables, fruits, whole grains, and low-fat or skim milk. It differs from the NSLP/SBP meal pattern by:

- Only requiring a whole grain/whole grain rich item served once per day
- Sets sugar limitations for cereals and yogurt
- Disallows flavored milk for children age 1 year through age 5 years
- Does not require vegetable subgroups or establish calorie minimums
- Offer vs Serve (OVS) is not allowed as a meal service style for preschool children

It is important to note the preschool meal pattern serving size requirements are **minimums**. It is a best practice to provide enough food to ensure all children receive enough to eat a healthy meal and/or snack.

Frequently Asked Questions:

1. If an SFA leases out space to a private day care, can reimbursable meals served to these students be claimed by the SFA?

No, the meals cannot be claimed by the SFA in this situation. The day care meals cannot be claimed as reimbursable since the students are not part of the SFA's enrollment. However, the day care may be eligible to participate in CACFP and receive reimbursement for these meals. The SFA could then provide meals and could invoice the day care for the meals.

2. If a GSRP program is in an elementary school building, is it ok to use the same Breakfast and Lunch menu as the elementary school if it meets the minimum Pre-K meal pattern requirements?

Yes, if the Pre-K meal pattern requirements are met and only 1% or skim white milk is offered. Remember the Pre-K menu pattern has sugar limits for cereals and yogurt and grain-based desserts are not creditable.

3. Can an SFA charge a GSRP program delivery fees and paper product fees on top of the meal price?

Paper costs should be considered when meal prices are set by an SFA. Therefore, paper costs are included in the meal price and must not be invoiced separately. Delivery fees can be invoiced separately if the GSRP program is in a separate building and the delivery is outside of the regular food service delivery. Delivery fees should be invoiced on a separate line from the Free, Reduced, and Paid meal charges.

Questions regarding this Administrative Memo may be directed to the School Nutrition Programs unit by e-mail to mde-schoolnutrition@michigan.gov.

ⁱ http://www.michigan.gov/mde/0,4615,7-140-66254_50144-336662--,00.html

ⁱⁱ <https://www.fns.usda.gov/cacfp/meals-and-snacks>