Residential Child Care Institutions (RCCIs) in Michigan School Nutrition Programs

Quick Guide & Frequently Asked Questions

Why are RCCIs in School Nutrition Programs?

Since 1946, the National School Lunch Program (NSLP) has provided financial support and federally purchased commodities to help schools serve nourishing, well-balanced meals to children. The Child Nutrition Act of 1966 expanded the program to include breakfast. In 1975 an amendment to the National School Lunch Act extended eligibility to include RCCIs. Benefits provided through School Nutrition Programs (SNPs) such as the NSLP and School Breakfast Program (SBP) in RCCI facilities include cash reimbursement for breakfasts, lunches, and snacks planned according to required meal patterns (to ensure nutritional adequacy) and served to eligible students, as well as the provision of the United States Department of Agriculture (USDA) donated food assistance (USDA Foods) through the Food Distribution Program (FDP).

Applicable Regulations

Regulations pertinent to the operations of SNPs in an RCCI are: 7 CFR: Part 210, Part 220, Part 250 and the Uniform Guidance for Procurement in 2 CFR Parts 200.317-.326. Please see the Michigan Department of Education (MDE) SNP website for more information at the <u>School Nutrition Programs website</u>ⁱ

Which Institutions are Defined as RCCIs?

Institutions qualifying as an RCCI eligible for full benefits include, but are not limited to, the following:

- Group homes
- Halfway homes
- Juvenile detention centers
- Long-term care facilities for chronically ill children
- Orphanages

- Temporary shelters for abused and/or runaway children
- Homes for the cognitively impaired, emotionally disturbed, physically handicapped, or unmarried
- Boarding schools are not considered RCCIs

Issues & Processes Specific to RCCIs

- Free and Reduced Eligibility: An institutionalized child is considered a one-person household since he/she is not living with his/her actual family as an economic unit. Payments received by the institution, from any source, 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 income. As a result, most institutionalized children can be claimed as free because the children's personal income falls well within the free eligibility guidelines. Instead of applications, RCCIs must have a list of students with each student and their in and out dates listed and signed by administrator. For day treatment centers (where students are not residents), applications are required to determine free, reduced, or paid eligibility. For day treatment centers, RCCIs need to have applications and direct certification lists on file and submit day treatment claim based on free/reduced/paid eligibility and enrollment.
- **Meal Claiming:** RCCIs may claim breakfasts and lunches on all days of participation, not just school days. They may only claim breakfast, lunch and afterschool snacks through SNP and not the Child and Adult Care Food Program (CACFP). Additional requirements for snacks apply ask the Michigan SNP office for more information. There must be a way to determine that children were present on a given day (e.g., roster or sign-in sheet). Most RCCIs use a monthly roster system. A system must be in place at the point of service that marks as a reimbursable meal is taken, and not before or after meals are served (e.g., counts based on attendance).
- **Meal Pattern Exceptions:** RCCIs are allowed to submit a request for exception if they can document that they serve a combination of age-grade groups and they are a juvenile detention center, correctional facility, or have legitimate safety concerns if not following a single grade 9-12 meal pattern. A copy of the exception request form, along with directions, is available at the <u>School Nutrition Programs website</u>ⁱ.
- School Food Authority Verification Collection Report (SFA-VCR): RCCI students are exempt from verification except for day students. However, unless otherwise noted, RCCIs must still complete the SFA-VCR for the State of Michigan via the online Michigan Nutrition Data (MiND) System each year. The report typically opens in December or January and is due in February 1. Specifics will be sent via SNP e-mail updates and posted on the SNP website. A section of the website called "Steps to Complete Verification" also provides additional information.

Issues & Processes Specific to RCCIs (continued)

- Family Style Meals: If the facility serves family style meals, food items must be placed on the table with enough for at least the minimum portions of the reimbursable meal components for all children at the table. The required amount of each food component must be *offered* to each child, but does not need to be *taken* by the student (i.e., *served*). Since the foods are available at each table, the initial serving of a food component or food item may be less than the full required minimum serving size. The supervising adult should encourage additional portions and selections to complete the meal, as appropriate. However, each student *must* select at least ½ cup of a fruit or vegetable or a combination of both for the meal to be reimbursable.
- Food Safety Inspections: The National School Lunch Act requires two food safety inspections per school or center per year be completed by their local health department or government agency responsible for food safety inspections, or at a minimum requested by the facility. RCCIs are required to at minimum request two health department inspections per year (and save proof of request in writing), post the most recent inspection results in a publicly visible location, use a food safety plan based on Hazard Analysis and Critical Control Points (HACCP), and comply with Michigan Food Law and the currently adopted Food Code.
- **Paid Lunch Equity:** RCCIs do not need to complete the Paid Lunch Equity Tool, as all students are free. Exception: RCCIs with day treatment centers (students are not residents).

General Program Requirements

- Applications to Participate in SNPs: Each year, electronic applications are required to participate in SNP. Currently, applications must be submitted electronically through Michigan Electronic Grants System Plus (MEGS+) via the <u>MEIS websiteⁱⁱ</u> each year. Applications typically open each summer. Michigan SNP makes regular announcements when applications become available and due dates are determined.
- Benefit Issuance (Performance Standard 1): For day treatment centers, RCCIs need to have applications and direct certification lists on file and submit day treatment meal reimbursement claims based on free/reduced/paid status. For residents, lists can be used that are described on the previous page. See previous section and the <u>School Nutrition Programs websiteⁱ</u> for more information.
- **Contact Information:** Michigan SNP uses contact information in the "Sponsor Information" section of the SNP application in MEGS+ to reach out to program contacts for regular updates, to schedule reviews, to alert contacts of deadlines, etc. Please be sure contact information is current so the correct contacts get updates in a timely fashion and don't miss out on key information.
- Meal Counting and Claiming (Performance Standard 1): A point of service meal count must be kept that checks off that students received reimbursable meals at the point of service and not before. These counts must be recorded for all reimbursable meals by free/reduced/paid status. Meal counts are then entered monthly into the MiND claim reimbursement system found within the <u>MEIS website</u>ⁱⁱ. RCCIs should use the maximum daily enrollment as the enrollment for a given month's claim. Claims should be submitted by the 10th of the following month of the claiming period.
- Meal Patterns (Performance Standard 2): RCCIs are required to follow the meal pattern, even if family style service is used. Production records and food crediting documents are required to document that meals claimed for reimbursement meet quantity and component requirements. Detailed requirements are available at <u>School Nutrition Programs website</u>ⁱ.
- Resource Management: Procurement practices must follow procedures outlined within the <u>School Nutrition Programs website</u>ⁱ. Keep SNP-related financial documents for four years, including: food costs, meal counts, free and reduced price meal data, production records, food crediting documents, and menus. At the end of the program year, the nonprofit food service will need to know an average food cost per meal to allocate expenses in year-end reporting. Additional year-end reporting may be needed.
- Wellness Policies: RCCIs are required to have a Local Wellness Policy, as well as to make it public and evaluate it every three years. Detailed requirements are available at <u>School Nutrition Programs website</u>ⁱ.

Additional information: Please contact the State of Michigan School Nutrition Programs at 517-241-5374 or by email to <u>mde-schoolnutrition@michigan.gov</u>.

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

ⁱⁱ http://www.michigan.gov/mde/0,1607,7-140-5236_29341---,00.html