

Residential Child Care Institutions (RCCIs) in School Nutrition Programs Frequently Asked Questions

KEY: Items highlighted in **yellow** are updates, as of the time this document was last updated (July 2017).

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PROGRAM BASICS AND BACKGROUND

Q1. Why are RCCIs in School Nutrition Programs?

A1. 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 meal program requirements (to ensure nutritional adequacy) and served to eligible students, as well as the provision of USDA donated food assistance (USDA foods) through the Food Distribution Program (FDP).

Q2. Which School Nutrition Programs can RCCIs participate in?

A2. RCCIs can participate in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) on all days of participation, not just school days. **They may also participate in the Afterschool Snack Program any day of the week, as long as there is a structured, supervised enrichment activity that is taking place during the time snack is served. This means that these meals may be claimed on weekends and holidays. If an RCCI operates year-round, this also applies to summer months** (be sure to select July and August as “extended school year” months in your annual application for School Nutrition Programs to claim these months).

Q3. Can RCCIs participate in the Child and Adult Care Food Program (CACFP)?

A3. No, not unless there are nonresidential day treatment students who participate in afterschool snack but do not stay at the RCCI (they are nonresidential). Generally, RCCIs are not allowed to

participate in CACFP because centers are not allowed to claim meals for residential children – only nonresidential children that attend an afterschool program at the residential facility.

TRAINING AND UPDATES

Q1. Will there be RCCI-specific training opportunities and resources in the future for RCCI participants of School Nutrition Programs?

A1. Yes. The School Nutrition Programs (SNP) team at Michigan Department of Education (MDE) has created a page just for RCCIs within www.michigan.gov/schoolnutrition. The link is: http://www.michigan.gov/mde/0,4615,7-140-43092_50144-341860--,00.html

When possible, MDE SNP will offer RCCI-specific trainings. However, due to budget and timing limitations, these separate trainings may be limited.

Q2. Are there networking opportunities available for me to connect with other RCCI leaders across Michigan?

A2. Absolutely. The Michigan School Nutrition Programs (SNP) team will work to set aside meeting space for RCCI representatives to gather during larger group meetings, including the annual June Conference.

The ability of MDE SNP to offer RCCI-specific trainings may be limited, but MDE will work to accommodate and address RCCIs in its trainings and conferences whenever appropriate and possible.

Visit the RCCI page of the Michigan SNP website for updates, a link to an online RCCI Facebook group and additional networking opportunities. Use this link to access the Michigan SNP RCCI page: http://www.michigan.gov/mde/0,4615,7-140-43092_50144-341860--,00.html

There is also a third-party Facebook group available to Michigan SNP RCCI contacts. Contact your analyst or the Michigan SNP office (mde-schoolnutrition@michigan.gov or 517-373-3347) for more information.

Q3: Are there versions of the required annual civil rights training that do not require internet? I have several locations that need the training, but that do not have reliable access to Internet.

A3: Yes. The easiest way to give the required annual civil rights training is to use printed hard copy slides from the most recent School Nutrition Programs (SNP) civil rights PowerPoint. RCCIs who choose this option should have an agenda and sign-in sheet, and keep the information for four years, or until an audit is complete (if applicable).

A version of the training is available online here <https://mdoe.state.mi.us/GEMS/training/fmwiszip/presentation.html>. A slide presentation that can

be printed and used for training can be requested by contacting Michigan SNP (mde-schoolnutrition@michigan.gov or 517-373-3347).

CLAIMING

Q1. What days of the week are we allowed to serve reimbursable meals for the National School Lunch Program (NSLP) and the School Breakfast Program (SBP)?

A1. RCCIs may claim lunches and breakfasts on all days of participation, not just school days. Please note that 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 and mark each snack served to each student.

Q2. What days of the week can RCCIs claim the Afterschool Snack Program (ASP) through the National School Lunch Program?

A2. Previously, guidance directed that ASP was only allowable during school or instructional days. However, now that the guidance on allowable activities has broadened, Michigan School Nutrition Programs (SNP) is expanding days that can be claimed. Effective immediately, every day of RCCI operation may be claimed for reimbursable snacks under ASP if there is a structured, supervised enrichment activity surrounding snack service. The snacks are still required to meet the meal pattern and other requirements for the ASP (available on the Michigan SNP website, www.michigan.gov/schoolnutrition).

Q3. If there are children who would normally participate in the enrichment activity that is part of the Afterschool Snack Program (ASP) but were moved to isolation, can they be included in the meal count and can they be provided with a reimbursable meal?

A3. Yes. In fact, to exclude these children would be withholding food as punishment, which is not allowed. If the children were initially intending to be participating in the activity and getting snack, the RCCI would include the child in the meal count if s/he took a reimbursable meal during service time while in isolation.

Q4. What should an RCCI use as the “Enrollment” entry in their monthly claims?

A4. RCCIs should use the maximum daily enrollment for a given month on that month’s claim. For example, if in November daily participation counts ranged from 10 to 32, the RCCI would use 32 as its enrollment for that month.

MEAL PATTERN

Q1. My RCCI serves family style. During the family style service, is there a way for children to select extra portions of foods they want more of?

A1. Yes. Family style meal patterns use nutrition and component (food group) information based on the recommended meal, with the understanding that some students will take more or less than the exact portions specified in the recommended amounts. When family style service is used, students need to take at least a ½ cup of fruit and or vegetable.

SPECIAL RCCI CIRCUMSTANCES

Q1: For RCCI pods, what are the signage requirements?

A1: RCCIs should have the menu listed on a white board or on a downloaded, laminated MyPlate or similar poster. Sites should then list the menu items by component on this poster each day. Regardless of whether they are straight serve or offer vs. serve, they must have something that indicates what the menu is and what foods are being offered/served by component. If they are offer vs. serve, they should indicate that at least ½ cup fruit and/or vegetable must be taken with the breakfast or lunch meal.

Q2. Where can I get more information about RCCIs in School Nutrition Programs (SNP)?

A2. There are several ways to stay informed so RCCIs can stay updated on requirements:

- Michigan SNP RCCI page: http://www.michigan.gov/mde/0,4615,7-140-43092_50144-341860--,00.html
- Main page of Michigan SNP: www.michigan.gov/schoolnutrition
- Michigan SNP in-person trainings
- Michigan SNP online training modules, available here: http://www.michigan.gov/mde/0,4615,7-140-66254_50144-380541--,00.html
- SNP Supervisor Howard Leikert's *Weekly News* e-mail: Sent automatically to contacts in the current SNP MEGS+ application to participate; please make sure your contacts are current! Trainings are announced via e-mail

Q3. What is an RCCI exception request?

A3. An RCCI exception request refers to a one-page form that an RCCI can use to request to serve meals for only the grade 9-12 age-grade group of the meal pattern, even if several age-grade groups are served at a given RCCI. The request form is available on the SNP website (www.michigan.gov/schoolnutrition) and includes submission instructions.

If facilities can explain how they are either a juvenile detention center, a correctional facility, or there are legitimate safety concerns related to separating age/grade groups related to offering

meals with varying amounts of food during the meals meal period, an exception will likely be granted.

Please wait until approval is received before adopting only one grade 9-12 meal pattern.

Q4. We have special holiday or celebration meals a few times a year at our center. Are these reimbursable?

A4. It's possible that these meals could be reimbursable. For them to be reimbursable (claimable for reimbursement), the meals would need to meet the daily and weekly meal pattern requirements for School Nutrition Programs. For example, the offered meal would need to have all of the required components in the minimum quantities (e.g., meat/meat alternate, grain, milk, fruit, vegetable). The meal would also need to be considered in the weekly averaging of calories, saturated fat, and sodium that is done with regular reimbursable meal menus.

Or, it's possible for your center to serve these meals and not get reimbursement for these special meals. In that case, unless otherwise directed by the Local Wellness Policy or other guidelines, the meal pattern would not need to be followed.

Q5. What does my RCCI need to post publicly for to be in compliance with School Nutrition Programs (SNP) requirements?

A5. To be in compliance with SNP requirements, there are several items a "school" needs to post; in this case "school" also includes RCCIs. Please note that if there are several buildings in a given RCCI that participates in NSLP, if residents never go to a common area, these items must be available in every building. If residents go to a common area to eat or participate in other activities, it's okay to simply put the required items in that common area.

Items that must be visible in a publicly available part of your building (e.g., intake area or office):

- Reimbursable meal signage (must be in meal service area or best possible alternative)
- "And Justice for All" Civil Rights poster
- Menus for meals the site gets SNP reimbursement for - lunch, breakfast and/or snack

What needs to be publicly available – for example, by posting on your facility website or putting everything above and everything below on a bulletin board:

- Most recent health inspection
- Breakfast outreach – Promotion of the breakfast program in your facility
- Summer Food Service Program (SFSP) outreach – In May – August, promote nearby SFSP locations that offer free meals during the summer (e.g., promoting the phone, texting or location mapping information)
- Local Wellness Policy and assessment of that policy (assess every 3 years)

Q6. Do RCCIs still need to conduct SFSP and Breakfast outreach? This is required for schools, but it also appears to apply to RCCIs.

A6. Yes. According to regulations from the U.S. Department of Agriculture (USDA) that guide the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Summer Food Service Program (SFSP), RCCIs are considered “schools.” This means that, like traditional schools, RCCIs are required to conduct outreach for SBP three times a year and SFSP before and during the summer months, even if they do not participate in SBP or SFSP themselves.

The outreach can be basic; sample ways to meet the outreach requirement are:

- Posting breakfast promotion on a bulletin board in a common area of the RCCI (when, where, how much it costs), or in the intake area
- Posting phone number, texting information, and a link to nearby location maps or Michigan SFSP’s website (www.michigan.gov/sfsp) on a bulletin board or common area
- Posting this information on the RCCI website (if applicable)
- Including information in the intake or discharge process

Q7. Can RCCIs be a Team Nutrition school (on the listserv and included in updates) or apply for the Healthier U.S. School Challenge (HUSCC)?

A7. Yes and Yes! For more information on both options, please visit the Michigan Team Nutrition page, www.michigan.gov/teamnutrition, or contact Michigan School Nutrition Programs (mde-schoolnutrition@michigan.gov or 517-373-3347).

Q8. What do I do if there is an RCCI resident fasting for religious reasons and cannot eat lunch during the day?

A8. According to the U.S. Department of Agriculture (USDA), schools and centers participating in School Nutrition Programs (SNP) must offer reimbursable lunches between 10 a.m. and 2 p.m. However, schools may request an exemption from these times from MDE for ethnic, religious, cultural, or economic reasons.

A center may request this, for example, if a resident is participating in a religious holiday that requires fasting during the day. If an exception is received, the center could create a reimbursable meal and provide the meal after 2 p.m. (for example, in the evening) and claim that meal for reimbursement.

If a center that operates the National School Lunch Program wishes to receive an exception, please contact Michigan SNP (mde-schoolnutrition@michigan.gov or 517-373-3347).

SMART SNACKS

Q1. Smart Snacks guidelines impact foods and beverages sold to students during the school day outside of reimbursable meals. In the RCCI setting, how is “school day” defined?

A1. Each day that an RCCI is approved to serve the National School Lunch Program is recognized as a “school day.” Since Smart Snacks guidelines apply to midnight before through 30 days after the end of the school day, an RCCI may consider the “school day” the educational day if it follows a structured school day/day of education. Or, if there is not a set school day for your facility, please work with Michigan School Nutrition Programs staff to define your center’s school day (mde-schoolnutrition@michigan.gov or 517-373-3347).