



Understanding Food Service

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Agenda

- How school breakfast and lunch work in New York
- What changed under universal school meals
- Wellness policy
- Free/reduced and CEP
- Self-managed vs contract-managed models
- Parent/community engagement
- Governance questions boards should ask

Overview



Why Food Service Matters

School meal programs are a student wellness issue, an educational access issue, a fiscal issue, and a compliance issue.

- Meals affect readiness to learn, participation, attendance and student well-being.
- Boards approve policies, budgets, contracts and strategic direction.
- The district remains accountable even when operations are outsourced.
- “Free to students” does not mean “free to operate”



How School Meals are Structured

- USDA oversees the National School Lunch Program (NSLP) and School Breakfast Program, nationally
- NYSED is the state administering agency
- The district, as the School Food Authority (SFA), operates the program locally and is responsible for the compliance, claiming, procurement and records.

USDA → NYSED → District/SFA → Schools → Students

What is a reimbursable meal?



- Must meet federal meal-pattern requirements
- Reimbursable depends on accurate meal service and claiming
- Breakfast and lunch have specific component requirements
- Participation and accurate claiming now matter even more in a universal free environment
- Not a la carte items!

Recent Changes in NYS

What Changed in NYS



Beginning in SY 2025–2026, New York requires participating (NSLP) schools to provide breakfast and lunch at no cost to students.

- Major policy shift
- Boards no longer focus on whether students should pay and how much
- Boards focus on
 - Participation
 - Fiscal sustainability
 - Reimbursement optimization
 - Policy and compliance
 - Communication with the community

Free meals requires oversight



State and federal reimbursement support the program but districts still manage:

- Labor costs
- Food costs
- Equipment
- Overhead
- Procurement
- Participation risk

Boards should monitor whether the program is structurally sound, not simply if meals are “free”

How Reimbursement Works



- USDA sets annual reimbursement rates
- NYSED publishes NY-specific reimbursement schedules reflecting the state's universal free meals
- New York's reimbursement structure equalizes reimbursable student meals across free/reduced/paid categories by using state funds to fill the gap

Wellness

Wellness Policy



The local school wellness policy is a required board-level governance document, not a formality. Federal rules require stakeholder participation, public availability, and triennial assessment.

- Wellness policy connects nutrition, physical activity and school environment
- Align with district values and student wellness priorities

What's in the Wellness Policy?



- Goals for nutrition education/promotion
- Physical activity goals
- Nutrition standards for foods sold and provided
- Food and beverage marketing standards
- Stakeholder participation
- Designation of responsible officials
- Public notification
- Triennial assessment and repotting

Board Responsibilities under the Wellness Policy



- The policy is current
- The policy is publicly posted
- Stakeholders are engaged
- Assessments are conducted every three years
- Updates are made based on findings
- Implementation responsibility is clearly assigned

Free/Reduced Meals

Free/Reduced Meals in a Universal School Meals Environment



Even when meals are free to students, districts still need strong eligibility systems because reimbursement, Community Eligibility Program, and other data uses still depend on them.

- Universal free meals changed pricing to families, not the need for program structure.
- Direct certification and claiming still matter.
- Low-income data still matters for some non-meal purposes.

Free/Reduced Meals Basics



- Traditional eligibility is based on federal income guidelines.
- Confidentiality and respectful communication.

For example, NYSED's SY 2025–2026 income guidelines list a household of four as free up to \$41,795 and reduced up to \$59,478.

Direct Certification



Direct certification is one of the most important operational and fiscal levers in the program.

- Students can be certified through SNAP/Medicaid matching rather than applications.
- NYSED requires direct certification matching at least three times per school year under the universal meals framework.
- Better direct certification improves reimbursement strategy, especially for CEP.

Community Eligibility Program (CEP)



- CEP is a federal non-pricing option.
- Schools do not collect household applications for meal benefits under CEP.
- Reimbursement is based on Identified Student Percentage (ISP), not applications.
- $\text{Identified students} \div \text{enrollment} = \text{ISP}$

CEP Recent Changes



A major federal change lowered the CEP eligibility threshold from 40% to 25% ISP, expanding the number of schools that may qualify.

- This makes CEP newly relevant for many districts.
- But eligibility is not the same as financial viability.
- Boards should ask for modeling before decisions are made.

Does CEP Matter with Universal School Meals?



- New York adds a CEP state subsidy that helps offset the federal paid portion.
- That can materially improve the business case for CEP in NY compared with some other states.
- Districts should still model each building or grouping carefully.

School Breakfast Program

Breakfast Program



- Breakfast can be a participation growth opportunity.
- In New York, schools with 70% or more free/reduced eligibility are required to offer Breakfast After the Bell unless waived.
- Service model affects participation, staffing, and culture.

Breakfast Program After the Bell Models



- Breakfast in the classroom
- Grab-and-go
- Second chance breakfast

Running a Food Service Program

Who's Running the Program?



- Self-managed = more direct district control
- Contract-managed/Food Service Management Company (FSMC) = vendor-managed operations under district oversight
- Neither model removes district responsibility

In House Program



Potential strengths:

- Direct control over culture, menus, and staffing
- Stronger alignment with district vision
- Faster adaptation

Potential tradeoffs:

- Requires internal expertise
- More HR and management responsibility
- Greater operational burden

Contracted Program



Potential strengths:

- Operational support
- Staffing infrastructure
- Potentially broader purchasing or menu support

Potential tradeoffs:

- Contract monitoring burden
- Risk of losing visibility if governance is weak
- District still owns the program

Misconceptions of a FSMC



When an FSMC is used, the district still retains legal responsibility for core program oversight, claims, quality, and compliance. Federal rules require districts to retain control and monitoring authority.

- The district cannot outsource accountability
- Contracts must be structured and monitored carefully
- Vendor does not simply “handle it”



Procurement

Procurement



Boards should ensure administration has:

- Compliant procurement practices
- Proper bid and contract timelines
- Approved FSMC documents where applicable
- Buy American compliance awareness
 - Purchase domestic agricultural and food products to maximum extent possible
- Clear documentation for audit review

Parents & Community Engagement

Parents and Community



Parent groups care about:

- Quality and appeal of food
- Access and affordability
- Student experience
- Nutrition and wellness
- Transparency

Boards should use those groups as:

- Listening channels
- Communication partners
- Trust-builders

Parents and Community - Feedback



- Menu feedback groups
- Wellness committees
- Student voice panels
- Parent listening sessions
- Transparent reporting to the community

Wrap Up

What not to Ignore



- Declining participation
- Outdated wellness policy
- Weak direct certification processes
- No clear CEP analysis
- Limited contract oversight
- Poor communication with families
- No dashboard or financial trend monitoring
- Repeated audit findings or corrective actions

Final Thoughts



- School meals are now a major governance issue in New York.
- Universal free meals simplify access, but not administration.
- Wellness, reimbursement, CEP, breakfast models, and management structure all require informed oversight.



Resources

NYSED Child Nutrition Program

<https://www.cn.nysed.gov/>

New York State Universal Free Meals

<https://www.cn.nysed.gov/content/new-york-state-universal-free-meals>

Community Eligibility Provision (CEP) – NYSED

<https://www.cn.nysed.gov/content/CEP>

NYS Wellness Policy Assessment Tool

<https://www.cn.nysed.gov/sites/cn/files/nyslswpassessmenttool.pdf>

USDA Food and Nutrition Service – School Meals

<https://www.fns.usda.gov/school-meals>

Food Service Management Company (FSMC) – NYSED

<https://www.cn.nysed.gov/fsmc>



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