

Business and Non-Instructional Operations**Food Service****School Lunch Service****Statement of Policy**

The Board of Education (Board) recognizes that students require adequate, nourishing food and beverages to grow, learn, and maintain good health. It is the intent of the Board that District schools make a proactive effort to encourage students to make nutritious food choices. The Board directs that students shall be provided with adequate space and a lunch period of not less than 20 minutes for full-day students to eat meals.

The District shall offer nutritious meals to all students without regard to race, color, age, creed, religion, gender, sexual orientation, gender identity or expression, ancestry, national origin, marital status, pregnancy, disability, or any other basis prohibited by Connecticut or Federal law. The District shall ensure full accessibility to the school lunch program among children and families with limited English proficiency (LEP) by providing applications for free/reduced meals in the household's primary language. The District shall make substitutions for students with disabilities who have a signed medical statement from a state-licensed healthcare professional, in accordance with 7 CFR Part 15b.

This service shall be under the supervision of the Food Service Director, who shall be responsible to the Business Manager. The Food Service Director shall be hired in accordance with specific job specifications and be approved by the Board of Education.

Per this policy, the Superintendent shall develop and oversee the implementation of a **FOOD SERVICE PROCUREMENT PLAN & PROCEDURES**. This plan and procedures shall be included in the policy's administrative regulations.

Program Participation

The District shall participate in the National School Lunch Program (NSLP), the School Breakfast Program (SBP), and the Special Milk Program (SMP). These programs will operate in accordance with the **Healthy, Hunger-Free Kids Act, the USDA's 2024 Final Rule on Child Nutrition Programs**, and applicable state laws. The District's NSLP, SBP, and SMP will operate in accordance with all applicable state laws and regulations to meet dietary specifications.

Student Privacy and Unpaid Meal Debt

In accordance with C.G.S. 10-215 and Public Act 23-101, as applies to all students:

- 1) The District shall ensure that any student with a negative balance is treated with the same dignity as a student with a positive balance. Under no circumstances shall a student be required to perform chores to pay for a meal, nor shall they be denied participation in any school-sponsored activity or graduation solely due to unpaid meal debt. No student shall be publicly identified, shamed, or stigmatized for having unpaid meal charges (e.g., via wristbands, hand stamps, or alternative meals).
- 2) The District shall strictly maintain the confidentiality of students receiving free or reduced-price meals.
- 3) Communications regarding unpaid meal debt shall be directed to the parent or guardian, not the student.
 - a) Parents/Guardians shall be notified through a combination of electronic messaging, paper notifications (sent via U.S. Mail), and telephone calls, when students reach defined thresholds of unpaid meal balances (as outlined below in this policy's regulation guidelines).
 - b) When the threshold has been reached, parents/guardians shall be notified by (identify the method of communication).
- 4) The District shall provide a federally reimbursable meal to any student who requests one, regardless of their ability to pay or status of debt, to prevent "empty tray" incidents.
- 5) Debt collection efforts shall not involve any collection agencies that use "litigious or aggressive" tactics against families.

Aims & Facilities

Policies governing the operation of the school lunch program shall be as follows:

1. All food sold or served shall meet or exceed the updated USDA standards regarding sodium reduction, whole grains, and limited added sugars.
2. The District shall provide lunches free or at reduced rates to children who qualify under federal income guidelines. The application process shall be proactive and accessible.
3. Cafeteria facilities shall be well-ventilated, attractive, and equipped with modern storage to ensure food safety and minimize waste.

Facilities

Cafeteria facilities, wherever possible, shall include the following:

1. Attractive, well-ventilated dining rooms.
2. A carefully planned, well-equipped kitchen adjacent to each dining area.
3. Adequate storage space so that food and supplies may be purchased in sufficient quantities to take advantage of favorable market conditions.
4. Maintenance, inspection, and repair of equipment so that maximum use is obtained and the danger of accidents to personnel is minimized.

Maintenance of Sanitary Conditions and Financing

Sanitary conditions in all phases of food preparation and serving shall be rigidly maintained at all times. The District shall maintain proper sanitation and health standards in food storage, preparation, and service, in accordance with all applicable state and federal laws, regulations, and requirements.

1. The food service fund shall be a non-profit entity used solely for the improvement or maintenance of the food service program, and financed accordingly:
 - a. Prices of school lunches shall be determined by the Superintendent in accordance with all prevailing costs of food, supplies, supervision costs, and wages of hourly employees.
 - b. Costs of food, supplies, salaries and wages of all employees, and other expenses directly incurred in the school lunch program shall be paid out of a separate fund, which shall be maintained under the control of the Business Manager or his/her designee and into which all receipts from sales and federal cash grants shall be paid. This fund shall be subject to annual audit by the District/Town auditor. In compliance with federal law, the District's NSLP (and SBP) shall be non-profit.
 - c. Office facilities, equipment, heat, light, and power shall be paid out of funds appropriated by the Board of Education.
 - d. Although the Board believes that the District's nutrition and food services operation should be financially self-supporting, it recognizes, however, that the nutrition program is an essential educational and support activity. Therefore, budget neutrality or profit generation must not take precedence over students' nutritional needs.
2. The Food Service Director shall ensure all "Certified Food Protection Managers (CFPM)" meet Connecticut Department of Public Health requirements and provide training for all food handlers in personal hygiene and sanitation techniques.
3. Cafeteria workers shall meet all state-mandated health and immunization requirements for food handlers.

School Food Safety Inspections/School Food Safety Program

1. The District shall comply with state and federal requirements for conducting cafeteria health and safety inspections and ensuring employee participation in appropriate inspection services and training programs.
2. The District shall obtain two (2) safety inspections per year in accordance with all local, state, and federal laws and regulations and shall post the most recent inspection report and release a copy of the report to members of the public upon request.
3. The District shall comply with federal regulations in developing a food safety program that enables District schools to take systematic action to prevent or minimize the risk of foodborne illness among students.

Farm to School Program & Local Purchasing

The Board shall give preference to "Connecticut-grown" farm products in accordance with C.G.S. 22-38d.

1. Any bid submitted by a service manager company in response for proposal (RFP) or bid solicitation by the Board that is posted to the State Portal and that relates to the Board's school nutrition program shall include information detailing the consistency of such bid with the State's Farm to School Program and the ways in which such bid facilitates the purchase of products from local farmers by the Board. All other factors being equal, the Board shall give preference to the RFP or bid that promotes the purchase of local farm products.
2. Any bidder for food service management must detail how their bid facilitates the purchase of local products.
3. Proof of origin (name and address of the Connecticut farm) is required for any product sold as "Connecticut-grown."

Eligibility & Free Meal Access/Universal Access

The Board complies with all requirements related to its responsibilities to provide free breakfast and lunch to all eligible students and shall use the Community Eligibility Provision (CEP) to the maximum extent possible under law.

Nutritional Standards (USDA Final Rule 2024-2026)

As a participant in the National School Lunch Program (NSLP) or School Breakfast Program (SBP), the Board of Education shall comply with all federal requirements of the **USDA Final Rule 2024-2026** (*Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*) and its implementation phases.

1. The District is committed to ensuring limiting added sugars to less than 10% of calories across the week. (effective July 1, 2027)
2. The District shall implement a phased reduction of sodium levels targeting the most current USDA Sodium Targets as they are phased in through 2027, targeting “Sodium Target 1 (current baseline)” and “Target 1A (a further 10% reduction for lunch)” as applicable.

Procurement & "Buy American" Updates (Continue to Monitor for Updates)

The Board directs the Superintendent or his/her designee to monitor and follow all procurement procedures, including, but not limited to:

1. **Non-Domestic Cap** limiting non-domestic food purchases to a percentage cap of total commercial food costs.
2. **Local Incentive (CT), allowing access to the CT Local Food for Schools Incentive Program**, which provides matching state funds for purchasing locally grown or raised products. Administrative regulations should prioritize CT-grown produce to trigger these reimbursements.
3. **Protein Innovation complies with Federal rules**, which now allow nuts and seeds to be credited for the full meat/meat alternate component (removing the previous 50% limit), making vegetarian and plant-based menu planning simpler.

The District shall apply the 5% Threshold, which limits non-domestic food purchases to 5% of total commercial food costs.

The Food Service Director shall provide an annual “Local Procurement Report” to the Board of Education to track the efficacy of C.G.S. 22-38d compliance.

Financial & Administrative Management

The Board directs the Superintendent or his/her designee to monitor and follow all financial and administrative management procedures, including, but not limited to:

1. **Paid Lunch Equity (PLE)**, where districts with a positive or zero balance in their nonprofit school food service account as of June 30, 2024, are exempt from federal PLE pricing requirements.
2. **Net Cash Resources**, per federal law, requires the school food service fund not to exceed a three-month average of operating expenditures. If the net cash resources exceed such a limit, the Food Service Director shall be required to submit to the Superintendent a “Plan for Improvement” (e.g., equipment upgrades or improvements in food quality). The Superintendent shall make this plan available to the Board of Education.

3. **Indirect Costs**, charged by the Board of Education to the Food Service Fund shall be documented and consistent with the state-approved indirect cost rate.

4. **Unpaid Debt**, which strictly prohibits "lunch shaming" and specifies that no child can be publicly identified, shamed, or denied a meal due to unpaid charges.

Legal Reference: Connecticut General Statutes

10-215: Lunches, breakfasts, and other feeding programs (As amended by PA 21-46 and PA 23-101 regarding meal debt).

10-215a Nonpublic school and nonprofit agency participation in feeding programs.

10-215b Duties of State Board of Education re feeding programs.

10-215d Regulations re. nutrition standards for school breakfasts and lunches. (as amended by PA 16-37)

10-216 Payment of expenses.

State Board of Education Regulations

10-215b-1 School lunch and nutrition programs.

10-215b-11 Requirement for meals.

10-215b-12 Reimbursement payments. (including free and reduced price meals)

10-215d Regulations re. nutrition standards for school breakfasts and lunches. (as amended by PA 16-37)

10-221o Lunch periods. Recess. Board to adopt policies addressing limitation of physical exercise

22-38d Farm to school program. (as amended by PA 16-37 and PA 18-73)

Child Nutrition and WIC Reauthorization Act of 2004, 42 U.S.C. Section 1751.

School Lunch and Breakfast Programs 42 U.S.C. Section 1751 et seq.

National Food Service Programs, Title 7 Code of Federal Regulations, 7 CFR Part 210, Part 220, Part 215, Part 245.

42 U.S.C. Sec. 1758(h)/7 CFR Sect 210.13, 220.7 (School Food Safety Inspections).

Federal Register (74 Fed. Reg. 66213) amending federal regulations (7CFR Part 210 and 220).

P.L. 111-296 Healthy, Hunger-Free Kids Act of 2010 (HHFKA), 42 U.S.C. 1751

7 CFR Parts 210 & 220 – Nutrition Standards in the National School Lunch & School Breakfast Programs.

Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Assistance, 7 C.F.R. Part 15b (2001)

Federal Law:

7 CFR Parts 210 and 220, the “Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans” final rule. (89 FR 31962) and 225, and 226: (Updated USDA Nutrition Standards for 2024-2025).

42 U.S.C. 1751 et seq.: Richard B. Russell National School Lunch Act.

USDA Office of the Assistant Secretary for Civil Rights (ASCR) Policy Memo (May 2022): Clarifying prohibitions against discrimination based on gender identity and sexual orientation.

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 Revised/Adopted 9/9/2026

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Business/Non-Instructional Operations**Food Service****School Lunch Service****Responsibilities and Duties**

The lunch program shall be under the direction of the Food Services Director, who will report to the Business Manager/Director of Finance/Chief Finance-Operations Officer. The Food Services Director shall cooperate with building principals in matters essential to the proper functioning of the lunch program and the cafeterias.

Students

Students shall be permitted to bring their own lunches and to purchase beverages and incidental food items. The responsibility for managing student use of the cafeteria shall rest with the building principal.

Nutrition Guidelines and Food Operation**I. Meal Charge & Debt Management Procedures**

To ensure compliance with PA 23-101, the following steps shall be taken to manage unpaid meal charges while maintaining student dignity:

1. Notification Thresholds:

- **Level 1 (\$10.00 debt):** An automated email or text message shall be sent to the parent/guardian indicating the negative balance.

- **Level 2 (\$50.00 debt):** A formal letter shall be mailed to the home. The Building Principal or Social Worker may be notified to determine if the family is experiencing a hardship requiring additional district support.

- **Level 3 (\$100.00 debt):** The Food Service Director or designee shall call the parent/guardian to discuss the balance and offer assistance with the Free/Reduced Meal Application.

2. Prohibited Actions: Staff are strictly prohibited from:

- Taking a meal away from a student once it has been served.
- Discussing debt in the presence of other students.

- Using stamps, stickers, or "alternative meals" (e.g., a cold cheese sandwich) to identify debt.

3. Communication: All debt-related communication shall be with the adult household member. If a student asks about their balance, staff shall provide the information discreetly but shall not initiate the conversation.

II. Financial Oversight & "Net Cash Resources"

The Business Manager shall monitor the **Non-Profit School Food Service Account (NSFSA)** to ensure it remains a self-sustaining but non-profit entity.

- At the close of each fiscal quarter, the Business Manager shall calculate the "Three-Month Operating Average."
- If the fund balance exceeds this average, the Food Service Director shall submit a written "Plan for Improvement" to the Superintendent within 30 days. This plan may include, but not be limited to:
 - o Purchasing high-efficiency kitchen equipment (steamers, refrigeration).
 - o Increasing the frequency of "Connecticut-Grown" fresh produce.
 - o Funding professional development for cafeteria staff.
- Any indirect costs charged to the food service fund must not exceed the **Connecticut State Department of Education (CSDE)** approved rate for the current fiscal year.

III. Nutritional Standards & Phase-In (2024–2027)

The Food Service Director shall maintain menus that meet the phased-in **USDA Final Rule** requirements:

Component	Operational Standard
Added Sugars	Limit to < 10% of weekly calories (Targeting full implementation by 2027).
Sodium	Adherence to USDA Target 1 (current) and 1A (effective 2027).
Milk	Only fat-free or 1% milk served; flavored milk must meet sugar limits.

Local Products	A minimum of 10% of total produce spend should target "CT-Grown" to trigger state incentives.
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IV. Procurement & the "5% Non-Domestic Cap"

The District shall prioritize the "Buy American" provision as updated in 2024.

1. The Food Service Director shall maintain a "Non-Domestic Food Purchase Log" for any items not grown or processed in the U.S.
2. The total value of these non-domestic items (e.g., bananas, certain spices, or out-of-season fruit) shall not exceed 5% of the total commercial food cost.
3. All RFPs for food service management shall award "bonus points" (not to exceed 10% of the total score) to vendors with a proven track record of sourcing from Connecticut farms.

V. Civil Rights & Accessibility

- The "Parent Letter" and "Free/Reduced Price Meal Application" shall be made available on the district website in English, Spanish, and [Insert Top 3 Local Languages].
- The Food Service Director shall maintain a confidential file of all students requiring dietary substitutions. No substitution shall be made without a **Medical Statement** signed by a state-licensed healthcare professional.
- The USDA "And Justice for All" poster must be displayed in a prominent location in every cafeteria.

VI. Reporting & Audit

The Food Service Director shall provide the Board of Education with an **Annual Nutrition & Finance Report** each September. This report shall include:

1. Percentage of students participating in NSLP/SBP.
2. Total "CT-Grown" expenditure.
3. Total unpaid meal debt and a summary of collection efforts.
4. Confirmation of two (2) successful health inspections per site.

VII. Food Services Procurement Plan and Procedures

1. Purpose and Scope

The purpose of this plan is to provide a framework for ensuring that all procurement for the Northwestern Regional District No. 7 Child Nutrition Programs is conducted in accordance with 2 CFR Part 200 and 7 CFR Parts 210, 220, and 250. This document serves as the district's official written procurement procedures.

2. General Procurement Standards

- **Full and Open Competition:** All procurement transactions will be conducted in a manner that maximizes full and open competition. No restrictive requirements (such as unreasonable bonding or unnecessary experience) shall be used to limit bidding.
- **Responsibility:** The Director of Food Services is responsible for the oversight of all procurement activities and ensures that contractors perform in accordance with the terms of their contracts.
- **Code of Conduct:** No employee, officer, or agent of the District shall participate in the selection, award, or administration of a contract if a real or apparent conflict of interest exists. Officers/employees are prohibited from soliciting or accepting gratuities or favors from contractors.

3. Procurement Methods and Thresholds

The district will use the following methods based on the aggregate cost of the goods/services.

A. Micro-Purchases (Up to \$15,000)

- Procedure: Purchases may be awarded without soliciting competitive quotes if the price is considered reasonable.
- Requirement: To the extent practicable, the district will distribute micro-purchases equitably among qualified suppliers.
- Documentation: Purchase orders and invoices will be maintained to show price reasonableness and equitable distribution.

B. Small Purchase Procedures (\$15,001 to \$350,000)

- Procedure: Informal "Small Purchase" procedures will be used.
- Requirement: The Director of Food Services shall obtain a minimum of three (3) written or verbal price/rate quotations from qualified sources.
- Documentation: A Quote Tabulation Sheet will be maintained for every purchase, documenting the vendor name, date, price quoted, and the name of the person providing the quote.

C. Formal Procurement (Above \$350,000)

- Procedure: Formal advertising via Invitation for Bids (IFB) or Request for Proposals (RFP).
- Requirement: *Solicitations must be publicly advertised for at least 14 days.
- Price as the Primary Factor: In all RFP evaluations, price must be the primary factor and must be assigned the highest possible weight in the scoring matrix.
- Award: IFBs will be awarded to the lowest responsive and responsible bidder. RFPs will be awarded to the most advantageous proposal, price being the primary factor.

D. Noncompetitive Proposals (Sole Source)

- Procedure: Used only when competition is inadequate, in a public emergency, or with express written authorization from the CSDE.
- Documentation: A written justification for the sole source must be maintained and approved by the Business Manager.

4. Buy American Provision

The District will purchase, to the maximum extent practicable, domestic agricultural commodities or products (over 51% domestic content).

- **Monitoring:** The Director of Food Services will review product labels upon delivery.
- **Exceptions:** Limited to instances where a product is not produced in the U.S. in sufficient quantities or where costs are significantly higher.
- **Documentation:** An Exception Log will be maintained for all non-domestic items (e.g., bananas, pineapples) explaining the reason for the exception.

5. Affirmative Steps for Minority & Women's Businesses (MWBE)

In accordance with 2 CFR 200.321, the District will take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including:

1. Placing qualified MWBE firms on solicitation lists.
2. Assuring that MWBE firms are solicited whenever they are potential sources.
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation.

4. Establishing delivery schedules that encourage participation by MWBE firms.

6. Bid Protest Procedures

Any party with a direct financial interest who is aggrieved in connection with the solicitation or award of a contract may file a protest.

1. **Filing:** Protests must be filed in writing to the District Business Manager within five (5) business days of the notice of intent to award.
2. **Review:** The Business Manager will review the protest and issue a written decision within ten (10) business days.
3. **Appraisal:** The decision of the Business Manager is final. Documentation of the protest and its resolution will be shared with the CSDE upon request.

7. Contract Oversight & Records

- **Retention:** All procurement records (solicitations, quotes, scoring sheets, contracts) must be retained for three (3) years plus the current year.
- **Prohibited Contracts:** The District strictly prohibits the use of "cost-plus-a-percentage-of-cost" or "cost-plus-a-percentage-of-income" contracts.
- **Cooperative Purchasing:** If using a GPO or State Contract (DAS), the District will verify that the original solicitation included all federal clauses and was conducted via full and open competition.

General Conditions

I. Food Pricing

Food prices set by the District are communicated to students and parents. District pricing strategies will encourage students to purchase full meals and nutritious items.

II. Communication

Procedures shall be in place to provide families, upon request, with information about the ingredients and nutritional value of the foods served.

III. Modified Meals

The District shall provide substitute foods to students with special dietary requirements upon written parental permission and a medical statement by a certified health professional that identifies the student's special dietary needs. The medical statement shall state the medical condition or special dietary need that restricts the student's diet and provide a list of food(s) that may be substituted in place of the lunch or breakfast menu being served.

IV. Cafeteria Environment

Students are provided with adequate time (a minimum of 20 minutes) and space to eat meals in a pleasant and safe environment. School dining areas will be reviewed to ensure:

- A. Tables and chairs are the appropriate size for students.
- B. Seating is not overcrowded.
- C. Students have a relaxed environment.
- D. Noise is kept from becoming excessive.
- E. Rules for safe behavior are consistently enforced.
- F. Tables and floors are cleaned between meal periods.
- G. The physical structure of the eating area is in good condition.
- H. Appropriate supervision is provided.

V. Resources

The Connecticut State Department of Education's (CSDE) Meal Patterns Web Page shall be consulted regarding meal patterns for NSLP and SBP consistent with the nutrition standards to fulfill the requirements of the Healthy, Hunger-Free Act of 2010 and all subsequent state and federal updates.

VI. Other Foods Offered or Sold

The District recognizes that federal government standards requiring NSLP and SBP meals to be consistent with the applicable Dietary Guidelines for Americans do not apply to competitive foods sold or served outside the food service areas as defined in this regulation. Foods offered in classrooms or during school-sponsored activities, and food and beverages sold as part of approved school fund-raising events, shall meet minimum requirements unless otherwise exempt by law.

Legal Reference: Connecticut General Statutes

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10-215b Duties of State Board of Education re feeding programs.

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Part 210, Part 220, Part 215, Part 245.

42 U.S.C. Sec. 1758(h)/7 CFR Sect 210.13, 220.7 (School Food Safety
Inspections).

Federal Register (74 Fed. Reg. 66213) amending federal regulations (7CFR Part
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Consistent with the 2020-2025 Dietary Guidelines for Americans” final rule.
(89 FR 31962) and 225, and 226: (Updated USDA Nutrition Standards for
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42 U.S.C. 1751 et seq.: Richard B. Russell National School Lunch Act.

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