



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of the National School Lunch Program

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: September 25, 2013

SUBJECT: Operational Memorandum #53-13
Paid Lunch Equity: Additional Guidance for School Year (SY) 2013-14

This memorandum is a follow-up to [Operational Memorandum #29-13](#) "Paid Lunch Equity: Guidance for SY 2013-14" that was issued in May 2013. This memorandum provides flexibilities school food authorities (SFAs) may use when implementing the paid lunch equity (PLE) requirement for SY 2013-14. In OM #29-13, the Food and Nutrition Service (FNS) advised State agencies (SA) that in SY 2013-14 SFAs should be exempted from the PLE requirements if the following criteria were met:

1. The SFA has been certified as meeting the meal pattern requirements.
2. The SFA can demonstrate that the required increase to paid lunch prices or revenue contributions would cause the SFA to exceed the three-month operating balance limit.

It also indicated that when a PLE waiver request was issued by a SFA, the SA should consider whether there are other necessary or desirable uses for the funds to meet program requirements and goals or to address deficiencies in program operations.

For your review and records, attached to this memorandum is a list that the FNS provided SAs to consider when evaluating SFA requests for exemption from the PLE requirement. The FNS is asking that SAs use these questions as a guide when assessing whether there are other uses for the SFAs' excess funds. The FNS is also encouraging SAs to consider the totality of a SFA's responses and overall program operation when granting exemptions.

Questions may be directed to:

Consultants for School Nutrition Programs	
County	Consultant
Fairfield County	Fionnuala Brown fionnuala.brown@ct.gov 860-807-2129
Hartford County (towns/cities beginning with A-R)	Teri Dandeneau teri.dandeneau@ct.gov 860-807-2079
Hartford County (towns/cities beginning with S-W) Windham County	Susan Alston susan.alston@ct.gov 860-807-2081
Litchfield County	Allison Calhoun-White allison.calhoun-white@ct.gov 860-807-2008
Middlesex County Tolland County	Andy Paul andrew.paul@ct.gov 860-807-2048
New Haven County	Jackie Schipke jackie.schipke@ct.gov 860-807-2123
New London County	Monica Pacheco monica.pacheco@ct.gov 860-807-2073

JF:tdd

Attachment

Paid Lunch Equity Exemption – Factors for Consideration
Attachment to Operational Memorandum #53-13
September 25, 2013

Below are factors issued by the Food and Nutrition Service (FNS) for state agencies (SA) to use when considering granting a waiver request for exemption from the paid lunch equity requirement. Note that this list is not intended to be exhaustive and the Connecticut State Department of Education will examine other relevant aspects of program operation. The FNS encourages SAs to consider the totality of a School Food Authorities (SFAs) responses and overall program operation when granting exemptions.

At a minimum, the following questions must be answered in the affirmative.

Meal Standards

- Is the SFA certified as meeting the updated meal pattern requirements?
- Is the SFA financially prepared to meet future meal pattern requirements (e.g., fruit increases in breakfast and whole grain rich products)?

Competitive Foods

- Is the SFA taking specific steps toward meeting the new smart snacks standards for items sold from the school food service account, and does it have any projected financial considerations associated with these changes?

Administrative Reviews

- Has the SFA corrected all deficiencies, implemented all corrective actions and complied with any fiscal action identified in the most recent Administrative Review Report?

Additional Considerations: The SA should also consider the questions below to determine whether overall program quality is high enough to warrant providing the exemption.

Menu Improvements

- Are there simple menu improvements that could be made that would encourage students to eat healthier meals and make the program more appealing? For example,
 1. Has the SFA considered expanding offerings of fresh fruit and vegetables, and/or expanded variety of fruit and vegetables? Does the SFA use salad bars?
 2. Is student acceptance/participation strong? Has the SFA made efforts to engage students in meal planning, taste testing, etc.?
 3. Has the SFA established and implemented a wellness policy with the required elements?
 4. Does the SFA comply with all requirements and follow best practices with regard to preventing overt identification?
 5. Does the SFA utilize signage, food placement and other marketing techniques effectively to promote the selection of reimbursable meals?

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Professional Support

- Does the SFA have all child nutrition staff vacancies filled? (If vacancies are primarily due to lack of funding, rather than other factors, an exemption should typically **not** be approved, since the funds that would be provided to the SFA through the PLE requirement could be used to fund staff.)

Cafeteria and Kitchen Equipment

- Does the SFA have necessary cafeteria and kitchen equipment for storing, preparing and serving healthy meals and competitive foods?
- If the SFA has applied for Federal grants to purchase equipment needed to serve healthier meals, but has not received funding, did the SFA use its own funds to accomplish the proposed activities?

Certification

- Has the SFA done everything within its ability to improve the certification process to increase access to the program (e.g., maximize use of direct certification including homeless, runaway, and foster children, etc.)?