
AFTERSCHOOL SNACK PROGRAM

FREQUENTLY ASKED QUESTIONS

Compiled by

North Carolina Department of Public Instruction
Safe and Healthy Schools Support Division
School Nutrition Services Section

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AFTERSCHOOL SNACK BENEFITS

1. What are “Afterschool Snacks”?

The National School Lunch Program (NSLP) offers cash reimbursement to help schools serve snacks to students after the end of the regular school day. Afterschool snacks provide a nutritional boost and draw students into supervised activities that are safe, fun, and filled with learning opportunities.

2. How can students benefit from the snack service?

Afterschool snacks help ensure that students receive the nutrition they need to learn, play and grow. Organized, structured, and supervised programs that provide snacks allow students to think and behave better, and help them make the grade!

ELIGIBLE PROGRAMS

3. What are the criteria for participating in an After School Snack Program?

The Afterschool Snack Program (ASSP) offers federal reimbursement to School Food Authorities (SFA) meeting specific program criteria. Under the NSLP, the SFA must operate the lunch program and the school district must sponsor or operate an afterschool care program which:

- Provides children with regularly schedule activities in an organized, structured, and supervised environment; and,
- Includes educational or enrichment activities.

The SFA is responsible for maintaining documentation on file in the Child Nutrition office demonstrating how each afterschool care program meets the required criteria:

- Regularly scheduled – days of operation, including a start date and end date for the program;
- Organized – descriptions of how attendance and participation information is obtained and maintained (collection procedures/meal counts and production records);
- Structured – including a schedule detailing activities, snack service, and enrichment/educational component;
- Supervised – including a contact name and number; and,
- Educational/enrichment activity – describe the activity, component, or purpose of the afterschool program that demonstrates student education or enrichment.

Organized athletic programs may not be approved if they are engaged only in interscholastic or community level competitive sports; however, afterschool care programs which include supervised athletic activity may participate provided that they are “open to all” and do not limit membership for reasons other than space or security or, where applicable, licensing requirements.

In addition, the service of a snack must occur *after* school hours and during the operation of the school’s after school care program. Schools operating expanded learning times longer than the traditional school day may contact your Regional Operations Consultant for more information.

4. May school athletic teams participate in the ASSP?

A school athletic team may participate in the ASSP independent from another afterschool care program as long as they are sponsored by an active SFA, meet the requirements in the *Checklist for Qualifying an After School Snack Program*, and meet the program regulatory requirements. These SFA requirements for providing the ASSP to an athletic team include but are not limited to:

- SFA is approved to participate in the ASSP.
- Participating students are enrolled in the SFA and ASSP
- A roster is used to account for attendance and for snacks served.
- The program includes an educational/enrichment component and meets the program regulatory requirements.
- The SFA completes and maintains all official forms including *Checklist for Qualifying an After School Snack Program, On-site Review Forms, and Production Records*.

5. What are the criteria for the afterschool care programs?

In North Carolina, the *Checklist for Qualifying an After School Snack Program* or equivalent document must be completed and filed at the SFA office to document eligibility of each participating afterschool care program. The checklist may be downloaded at: <http://childnutrition.ncpublicschools.gov/programs/assp>.

6. Do expanded learning programs qualify for afterschool snack program reimbursement?

USDA Policy memos SP 04-2011 (issued October 8, 2010) and SP 04-2011 revised (issued January 21, 2011) provide guidance regarding expanded learning programs, the afterschool snack program, and qualifying criteria. Recently, educational programs aimed at serving at-risk children have evolved to include schools operating *expanded learning times* that are longer than the traditional school day. “Expanded learning time” is a common term in the education arena to describe schools or school districts that add significantly more school time for academic and enrichment opportunities to improve student achievement. Given the evolution of these educational programs, USDA has now expanded the scope of the traditional Afterschool Snack Program through the National School Lunch Program to include reimbursement of snacks to students in qualified schools operating longer than the traditional school day, provided that school operate a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the Local Educational Agency (LEA) in which the school(s) are located.

7. Are there any afterschool care programs that may not be approved?

Yes, organized athletic programs engaged in interscholastic or community level competitive sports only (i.e., youth sports leagues such as “Babe Ruth” and “Pop Warner” baseball leagues, community soccer and football leagues, area swim teams) may not be approved. However, afterschool care programs which include supervised athletic activity may participate provided that they are “open to all” and do not limit membership for reasons other than space or security or, where applicable, licensing requirements.

8. Does the “open to all” criterion apply to programs other than interscholastic sports program?

No, afterschool care programs that are designed to accommodate special needs or that have other limiting factors may be eligible to participate. They may include, but are not limited to programs targeted to children who have learning disabilities or programs for children who are academically gifted.

9. Is licensing required for an afterschool care program?

Otherwise eligible afterschool care programs do not need to be licensed in order to participate unless there is a State or local requirement for licensing. If there is no State or local requirement for licensing, then afterschool care programs must meet State or local health and safety standards. Organizations should check with their State and local health departments to determine the requirements they must meet to operate an afterschool program in their community. Existing afterschool care programs that have not had a meal service as part of their program in the past should also check with the State and local health department officials to determine whether any additional requirements apply as a result of the service of an afterschool snack.

10. Are programs that operate on weekends eligible for reimbursement?

The Afterschool Snack Program component in NSLP may only operate on days that school is in session. This may include snacks served in afterschool care programs operated for children attending summer school, but does not include weekends, holidays, or school vacations.

11. Are programs that operate during the summer vacation eligible for reimbursement?

Under the NSLP, school food authorities may claim reimbursement for lunches (and breakfasts under the SBP) served during the summer months when operating a summer school which is an integral part of the curriculum or an extension of the local educational program. Such school food authorities may also claim reimbursement for snacks served to children in afterschool care programs during this period.

12. May a school that does not participate in the NSLP receive reimbursement for afterschool snacks through the NSLP?

If the school food authority operates the NSLP in any of the schools under its jurisdiction, then all schools under the school food authority are eligible to provide snack service under the NSLP. If the school is not under the jurisdiction of a participating school food authority, it may be eligible to serve snacks under the CACFP, and is advised to consult the State agency.

13. May a morning or afternoon snack served in a Head Start Program be claimed under the NSLP afterschool snack service?

No, snacks served in the Head Start Program may not be claimed for reimbursement under the NSLP Afterschool Snack service because the Head Start Program is not an afterschool care program. Afterschool snacks served to Head Start participants are reimbursable only if they are served after regular school hours (i.e., after the Head Start Program) under the auspices of an afterschool care program.

14. May a school food authority which vends afterschool snacks to a private nonprofit sponsor claim those snacks under the NSLP?

No, a school food authority that vends afterschool snacks to a private nonprofit sponsor may not claim those snacks under the NSLP. In order for the school food authority to claim those snacks, the school food authority must have an agreement with the State agency and must assume full responsibility for meeting program requirements. However, snacks vended to a private nonprofit sponsor could be claimed by the sponsor under CACFP.

15. Must a school receiving reimbursement for afterschool snacks “manage” the day-to-day activities of the afterschool care program?

No. While the afterschool care program must be sponsored or operated by a school or school district, this does not mean that the school or school district must carry out the day-to-day management of the program. A school or school district may contract with another organization to manage the afterschool program on its behalf. For example, the PTA could operate the program under an arrangement with the school. However the school food authority must retain administrative and fiscal responsibility for the snack service. Furthermore, the school food authority must be the party that enters into the agreement with the State agency and must assume responsibility for meeting all snack service requirements, including ensuring that snacks are served in eligible sites.

16. Are charter schools eligible to participate?

Charter schools are eligible to participate if they: (a) meet the definition of “school”, as cited in 210.2, and (b) meet the approval criteria for afterschool care programs.

17. Can a school system participating in both School Breakfast Program (SBP)/ National School Lunch Program (NSLP) and the at-risk component of the CACFP receive reimbursement under CACFP for a meal and snack served to children who also received breakfast and lunch under the SBP/NLSP?

Yes. Based on the nature of the at-risk afterschool meals component of CACFP, the expectation is that most of the participating children attend school and receive free or reduced price meals. With that in mind, schools that serve children meals through NSLP are eligible for reimbursement for a meal and a snack served to children in an at-risk afterschool program through CACFP. However, schools may not serve children an afterschool snack through NSLP and then serve those same children an additional snack through CACFP.

AREA ELIGIBILITY

18. What is the definition of “area eligible”?

An afterschool care program site is “area eligible” if it is located at a school in the attendance area of a school where at least fifty percent (50%) of the enrolled children are eligible for free or reduced price meals. For example, if a high school with less than 50% free or reduced price school enrollment is located in the attendance area of a middle school that has 50% percent or more of the enrolled children eligible for free or reduced price meals, then the afterschool program located in the high school would be area eligible.

19. Can school district wide data be used to establish area eligibility, or must data from individual school buildings be used?

Only data from the appropriate individual school(s) may be used to establish a site's area eligibility.

20. If a school district has mandated busing of students, can free and reduced price school data be used to determine a site's area eligibility?

Yes, an afterschool care program located in an area which has mandated busing of students should use free and reduced price school data from the individual school building in whose attendance area the afterschool site is located.

21. If schools have unassigned attendance areas (i.e., parents can choose where to send their children from among several schools), what data should be used to determine a site's area eligibility?

In areas with unassigned school attendance areas, afterschool care programs located in school buildings should use the free and reduced price enrollment data from that particular school for purposes of determining area eligibility. Work with your State agency on a case-by-case basis to determine the area eligibility of afterschool care programs operating in non-school sites in areas with unassigned attendance areas.

22. If a site is not area eligible, must the SFA take applications for individual students to determine eligibility for free or reduced price snack benefits?

Since the SFA is already participating in the NSLP, it will have free and reduced price applications on file. The eligibility determinations for those applications would apply for both the lunch and snack service under the NSLP. If an approved free or reduced price application is not on file, the SFA will earn the paid rate of reimbursement for snacks served to that student unless the student makes application and is approved for free or reduced price benefits.

23. Is there a particular month of school data that must be used to determine area eligibility?

Under the NSLP, a site's area eligibility must be based on the total number of children approved for free and reduced price meals as of the last day of operation for the most current October, or another month at the State agency's discretion. In North Carolina, area eligibility must be based on the total number of children approved for free and reduced price meals as of the last day of operation for the most current November.

For example, if a site applies for area eligibility in August 2010, the most current November data would be November 2009. If a site applies for area eligibility in December 2010, the most current November data would be November 2010.

24. How long is a determination of a site's area eligibility valid?

Under the NSLP, the site's area eligibility is valid for the entire school year. For example, a determination of a particular site's area eligibility made on April 20, 2010, is valid for snacks served for the remainder of school year (SY) 2009-2010, i.e., from April 20, 2010 through June 30, 2010. Similarly, a determination of a site's eligibility made on July 30, 2010 is valid for the remainder of the SY 2010-2011, i.e., from July 30, 2010 through June 30, 2011.

25. May afterschool care programs use private school free and reduced price enrollment data to qualify as area eligible sites?

If an afterschool care program site is located in a private school, then that site may use the free and reduced price enrollment data for that private school, or free and reduced price enrollment data for the public school in whose attendance areas the private school is located, to qualify as an area eligible site. However, since most private schools do not have defined attendance areas, a public school may not use private school free and reduced price enrollment data for purposes of determining area eligibility unless the public school's afterschool care program is actually located in the private school.

26. How are reimbursement rates determined when a school receives children from other schools for the afterschool care program?

For area eligible afterschool care program sites, reimbursement rates are based on the area eligibility of the site, regardless of which schools the children attend. For afterschool care program sites that are not area eligible (NSLP only), reimbursement is based on the individual eligibility of the student, regardless of which school they attend. Current eligibility determinations made for the lunch and/or breakfast service should be used for the students participating in an afterschool care program.

APPLICATIONS AND AGREEMENTS

27. How does the SFA apply for afterschool snacks?

Each SFA must apply for participation through the School Nutrition Technology website by completing Section C of the School Nutrition School Meal Program application. Once submitted, the State Agency will review the information and contact the SFA when approved. Federal reimbursement may only be provided for approved Afterschool Snack Programs. Approved programs must have a completed the *Checklist for Qualifying an After School Snack Program*, or equivalent document, on file in the Child Nutrition office.

The application must identify all afterschool care program sites and, for area eligible sites, provide documentation of the attendance area within which the applicant sites are located. Once the application is approved, the SFA must enter into an agreement with the State agency which specifies the terms and conditions of participation. Contact your State education agency for more information.

28. For a school or organization that is already participating in the NSLP and now wants to provide afterschool snacks, does the agreement with the State agency need to be amended?

Yes. Once the State agency approves the school food authority's application to provide afterschool snacks, the agreement with the State agency needs to be amended to reflect this additional meal service and its requirements. This amendment may be completed on the Child Nutrition Technology website and may include a written or e-mail notification to the State agency specifying the terms and conditions of expanded participation in afterschool snack service. The Afterschool Snack Program agreement must be approved by the State agency to receive reimbursement.

REIMBURSEMENT

29. When do the reimbursements begin?

Under this provision, schools may claim reimbursement for one snack, per child, per day to participating programs that serve afterschool snacks to children and youth through the age of 18. Reimbursement will be earned for snacks served as soon as the State agency approves the ASSP application.

30. What records must be maintained when administering the ASSP?

In the After School Snack Program (ASSP), the following records must be maintained to support the claim for reimbursement:

- Documentation demonstrating the afterschool care program meets the criteria for participation in the reimbursable afterschool snack program. A completed *Checklist for Qualifying an Afterschool Snack Program* will satisfy this requirement and is available on the Child Nutrition Technology website.
- For sites that are not area eligible, free and reduced price applications for all children for whom free and reduced-priced snacks are claimed.
- Point of service (POS) meal counts:
 - Non-area eligible – meal counts by type (free, reduced, and paid)
 - Area eligible – total meal count
- Documentation for each day of a child’s attendance
- A check-off roster/sheet that documents each reimbursable snack received by each eligible student; the check-off roster/sheet must identify each student by name or personal identification number.
- Documentation of compliance with meal pattern requirements and production records. A state-agency approved production record must be accurately completed for each meal service.

Meal counts taken at the point of service are required for afterschool snack service by the North Carolina Department of Public Instruction School Nutrition Services Section. Accurate meal count records must be maintained to support claims for reimbursement. All records, reports and documents pertaining to the afterschool snack program must be retained for a minimum of three years plus the current operating year.

31. What are the reimbursement rates for snacks served in afterschool care programs?

Under the NSLP, snacks served in area eligible afterschool care program sites are reimbursed at the free rate. Afterschool care programs that are not area eligible receive free, reduced price, and paid reimbursements depending on the eligibility status of participating children. Reimbursement rates are adjusted annually every July 1. Current reimbursement rates are available at:

<http://www.fns.usda.gov/school-meals/rates-reimbursement>

32. What is the pricing structure for snacks at schools that are not area eligible?

The meal supplement must be priced as a unit. A school may never charge children for snacks claimed at the free reimbursement rate. If charging for meals, the charge for a reduced price meal supplement shall not exceed 15 cents.

33. Can afterschool care programs that have been charging participants for snacks receive retroactive reimbursement for those snacks?

In order to receive retroactive reimbursement, afterschool snacks must be made available to children free, at a reduced price or paid, as applicable. If an otherwise eligible afterschool care program has been charging participants for snacks, retroactive reimbursement may be provided only if the program provides each household with a refund.

34. If a school is participating in Provision 2 or 3, can base year percentages of the number of students eligible for free and reduced price benefits be used to determine area eligibility for snack reimbursement in subsequent years?

Schools implementing Provision 2 or 3 may use the percentage of students eligible for free and reduced price meals in the NSLP (not the School Breakfast Program) during the base year to determine area eligibility for the duration of the provision. When the school establishes a new base year, or drops the provision, the new eligibility data must be used for determination of area eligibility.

ELIGIBLE CHILDREN

35. Are afterschool snack reimbursements restricted to children ages 13-18?

No, reimbursement may be claimed for snacks served to all children through the age of 18 in eligible afterschool care programs. Reimbursement may also be claimed for those children who turn age 19 during the school year.

To be eligible for this reimbursement, the school must operate a program (1) designed primarily to provide care for these children and (2) with an educational or enrichment purpose. Public Law 105-336 indicates that this provision is “meant to ensure that children receiving this benefit are participating in a program that provides the types of activities known to help reduce or prevent involvement in juvenile crime. It is not expected that support would be provided to members of athletic teams and others who are not participating in such activities.”

36. Are afterschool care programs eligible to receive reimbursement for snacks served to pre-primary children?

Snacks served to children who are attending classes of pre-primary grade in a school (i.e., Head Start or Even Start) and who are participating in an eligible afterschool care program after their regularly scheduled school program may be claimed for reimbursement.

MEAL SERVICE REQUIREMENTS

37. Are point of service meal counts required?

Meal counts taken at the point of service are required for afterschool snack service by the North Carolina Department of Public Instruction Child Nutrition Services Section. Accurate meal count records must be maintained to support claims for reimbursement.

Afterschool care programs in NSLP must also maintain a roster or sign-in sheet which documents the total number of children in attendance in the afterschool care program. The roster or sign-in sheet is intended to establish the maximum number of snacks that can be claimed on a given day, and to document that a site has an eligible afterschool care program (i.e., organized, supervised, and regularly scheduled).

38. Must a certain amount of time elapse between meal services when schools or organizations operate other nutrition programs in addition to afterschool snacks under NSLP?

In NSLP, there are no restrictions on the amount of time that must elapse between meal services (i.e., lunch and afterschool snack).

39. Is there any length of time tied into the conclusion of school and the service of a snack?

No. There is no Federally-mandated time limit between the end of school and snack time, but the service of a snack must occur during the operation of the school's afterschool care program; however, children's eligibility is based on when their scheduled school day ends and not on whether or not the school continues in session. For example, if a kindergarten program ends at noon but the children remain in school under an afterschool care program, snacks served to these children may be reimbursed under this provision. The same would be true for older children enrolled in schools that have split sessions. If children enrolled in the early session remain on campus to participate in an approved afterschool care program, they may receive reimbursable snacks even though the school continues to operate a later academic session.

40. Are production records required?

Production records are required for programs operating through the NSLP to demonstrate compliance with the Afterschool Snack Program meal pattern/portion sizes. The State agency-approved production record must be completed for each reimbursable meal service. The approved production record template may be downloaded from:

<http://childnutrition.ncpublicschools.gov/programs/assp>

41. Is there an offer versus serve option for afterschool snacks?

No. There are four components to the snack meal pattern. The school or institution must serve at least two of the required components to each child.

42. May USDA foods be used in snacks?

Yes, afterschool care programs operating under NSLP may use USDA foods in the afterschool snack service; however, the school or organization will not earn additional entitlement for USDA foods as a result of serving afterschool snacks. The amount of entitlement earned will continue to be based solely upon the number of reimbursable lunches served.

43. Is the afterschool snack to be included in the week's nutrient analysis?

No. Menu planners are encouraged to utilize nutritious low-fat, low-sodium, high fiber food items even though a nutrient analysis of snack menus are not required.

44. What type of snacks must be served?

In order to be reimbursed, the snacks must contain at least two different components of the following four: a serving of fluid milk; a serving of meat/meat alternate; a serving of vegetable(s) or fruit(s) or full strength vegetable or fruit juice; a serving of whole grain or enriched bread or cereal. Refer to the USDA Food Buying Guide Meal Pattern for Afterschool Snacks, page I-15. In addition, you may not serve juice if you serve milk as the only other component of a snack, per USDA Food Buying Guide, page 2-1. In addition, the ASSP Meal Pattern Chart can be found at: [http://childnutrition.ncpublicschools.gov/programs/assp/after-school-snack-program-
assp/information-resources/menu-planning-production](http://childnutrition.ncpublicschools.gov/programs/assp/after-school-snack-program-
assp/information-resources/menu-planning-production)

45. Is drinking water required to be available during afterschool snack?

No. Drinking water is not required for the ASSP; however, it is recommended to offer water to the extent that is practical.

MONITORING

46. What is the Checklist for Qualifying an After School Snack Program?

The *Checklist for Qualifying an After School Snack Program* is a simple yet comprehensive self-assessment for SFA's to use in determining if program criteria are met prior to program approval and to qualify afterschool care programs for participation. The *Checklist* is available at: <http://childnutrition.ncpublicschools.gov/programs/assp> and must be completed before reimbursable snacks are provided and claimed for reimbursement. A separate *Checklist for Qualifying an After School Snack Program* or equivalent document must be completed and filed at the School Nutrition Office for each participating afterschool care program. If using an alternate or equivalent document, contact your Regional School Nutrition Operations Consultant for prior approval.

47. Who administers the ASSP?

The NSLP and associated ASSP are administered by the Food and Nutrition Service, an agency of the U.S. Department of Agriculture. Within individual States, the program is administered by a State Agency, in North Carolina the North Carolina Department of Public Instruction, School Nutrition Services. At the local level, the program is administered by the school/school district.

48. What are the monitoring requirements for School Food Authorities receiving reimbursement for snacks in afterschool care programs?

Each afterschool snack program must be reviewed by the School Food Authority (SFA) two times per year (210.9I(7)). The SFA must make the first review during the first four weeks of snack service each school year with the second review occurring before snack program ends. These reviews must assess each program's compliance with counting and claiming procedures and the ASSP meal pattern. A review of the *Checklist for Qualifying an After School Snack Program*, the Point of Service (POS) participation roster, menu and production records should be included in the

review. A copy of the after school review form is available at:
<http://childnutrition.ncpublicschools.gov/programs/assp>

49. What are the State Agency’s Administrative Review (AR) requirements for school food authorities and organizations operating the ASSP?

When conducting an administrative review of a school food authority for NSLP, the SA is required to conduct a review of the breakfast and lunch service. If a follow-up review is required and the State agency did not evaluate the certification, meal or milk count method, and meal or milk service procedures for the SBP, the SMP and snack service in Afterschool Snack Program(s) (210.18 (i)(4)(iv) during the administrative review, it must do so for those schools selected for the first follow-up review. In North Carolina, the administrative review typically includes all school meal programs operated by the sponsor, including the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASSP), Special Milk Program (SMP), and Seamless Summer Option (SSO).

EXPANDED LEARNING TIME PROGRAMS

50. Are SFAs that have moved to a four-day week eligible if their hours are over the average of a five day a week school?

The district may be eligible. As stated in the memo, “In LEAs in which all schools operate an expanded learning time program, or in single-school LEAs, the State’s average length of the school day or the average length of the school day of surrounding LEAs may be used to determine the standard minimum number of school day hours.” So, if a district’s change to a four day school week increases the school day at least one hour longer than the State’s average school day or the school day of surrounding LEAs, the district is eligible for afterschool snacks.

51. Does the State need to establish (length of school day) averages differently for four day weeks versus five day weeks?

The State does not need to establish different length of school day averages for four and five day a week schools. Nor is the State to establish averages for schools.

52. Should the State establish separate (length of school day) averages for elementary and secondary schools?

In order for a school to be eligible it must “operate a school day that is at least one hour longer than the minimum number of school day hours required for the comparable grade levels by the local educational agency in which the school is located”. If the State has a minimum number of hours per day set for schools, the school day should be as compared to similar grade levels. Again, the State does not have to establish these and can use the hours from neighboring LEAs.

53. A State has begun reclaiming funds from a school/district that claimed snacks during an extended day program previously understood to be ineligible, but eligible under this new memo. Will this memo allow the State to disregard the reclaim?

Yes, the State may choose to disregard this claim. The State may also choose to continue with the claim because the policy has changed and the violation occurred under the previous policy.

54. Does this policy apply to RCCIs?

Yes. RCCIs that serve an afterschool snack may serve this snack during school hours provided they meet the requirements. If snack is served at multiple times, care must be taken to assure only one snack per child is reimbursed.

55. If a school extends their school day for two weeks before exams, are they eligible for a snack?

If the school is already participating in the afterschool snack program, they may move the snack to the school day if all the requirements are met. A school may not simply start the program before exams and then stop the program when exams are complete.

RESIDENTIAL CHILD CARE INSTITUTIONS

56. Are all residential child care institutions, including juvenile detention centers, eligible for the afterschool snack provision or just residential child care institutions which also have a day care component?

Any residential child care institution (RCCI) that participates in the NSLP/SBP may participate as long as the RCCI operates an afterschool care program with enrichment or education activities.

57. When determining the reimbursement status of residential child care institutions, should the State agency consider the percentage of free and reduced price children enrolled in the institution or the percentage of free and reduce price children enrolled in the local public school?

As schools, RCCIs will routinely receive free reimbursement for all snacks based on the fact that more than fifty percent (50%) of their enrolled children are eligible for free or reduced price school meals. In the unlikely event that a RCCI cannot qualify for the free rate for all snacks based on its enrollment, the RCCI could still qualify by using the enrollment data from a school serving the area in which the institution is located.

58. Can afterschool care programs operated by residential child care institutions claim reimbursement for snacks served during weekends, holidays, and school vacations?

Congress intended this provision to apply to snacks served in schools after an educational activity. If no regularly scheduled education activity is taking place, as is generally the case on weekends, holidays and vacations, reimbursement cannot be claimed for snacks served on those days. In this respect, RCCIs are subject to the same provisions as any other school. They may not claim reimbursement for snacks served on weekends, holidays or vacation periods unless the snack is served during an activity that takes place after an education activity that is determined to be an integral part of the curriculum or an actual extension of the local education system. This limitation

on snack eligibility differs from the general authorization of reimbursement for lunches and breakfasts served in RCCIs due to the special nature of the afterschool snack benefit.

59. Can pre-school children enrolled in a residential child care institution afterschool care program have reimbursable snacks?

Yes, just as in any other school.

Under the current lunch/breakfast program regulation, residential child care institutions may be reimbursed for meals served to children who have not yet reached their 21st birthday. However, children who turn 19 during the school year may continue to participate in the snack program rather than becoming ineligible immediately upon reaching their 19th birthday. Is this inconsistency intentional?

The age requirements for participation under the Afterschool Snack Program provision are somewhat different from those established for the NSLP and SBP in general. The law limits participation in the snack provision to children 18 years old and under. However, to reduce paperwork and ease administrative burdens on local administrators, Congress in the conference report, authorized schools to continue receiving reimbursement for snacks served to children who become 19 during the school year ending the following June 30. This provision applies to RCCIs as well as all other schools. It must be emphasized that, under no circumstances, can a RCCI continue to be reimbursed for snacks served to children after the school year in which they become 19, and students continue to become ineligible for reimbursable lunches or breakfasts as soon as they reach 21.

60. Can a residential child care institution claim reimbursement for a snack served to a child who did not attend school that day (i.e., the child was ill)?

It would depend on whether the child is participating in an approved afterschool care program on that day. If the child is participating in the approved afterschool care activity, it doesn't matter that he may not have been in school. As with other schools, there is no requirement or expectation for tracking whether or not the child actually attended school on any given day.

61. If the afterschool care activities occur late in the afternoon and coincide with the evening meal service, may the residential child care institution claim that meal as a snack?

Congress intended the afterschool snack to be an additional food benefit that, in all likelihood, would not otherwise be available to children. Therefore, if a RCCI already has a scheduled evening meal service, as would generally be the case, it would have to serve a separate snack as an additional offering at some other time during the afternoon.

RESOURCES

<http://www.fns.usda.gov/sites/default/files/AfterschoolFactSheet.pdf>
<http://www.fns.usda.gov/sites/default/files/HHFKAfactsheet-athletics.pdf>
<http://www.fns.usda.gov/school-meals/afterschool-snacks-faqs>
<http://childnutrition.ncpublicschools.gov/programs/assp>

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