



COMMONWEALTH of VIRGINIA

DEPARTMENT OF EDUCATION

P.O. BOX 2120

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SNP Memo #2014-2015-06

TO: Directors, Supervisors, and Contact Persons
School Nutrition Programs

FROM: Catherine Digilio Grimes, MS, RDN, LDN, SNS
Director, Office of School Nutrition Programs

A handwritten signature in blue ink that reads "Catherine Digilio Grimes".

DATE: October 22, 2014

SUBJECT: USDA-FNS Study of Unpaid Meal Charges. Request for Information
on Current Policies and Procedures and Associated Advantages and Challenges

On October 16, 2014, FNS published a Request for Information (RFI) in the Federal Register related to unpaid meal charges in school meals programs. FNS is seeking information from all affected parties on current State and local policies regarding extending credit to children by allowing them to “charge” the cost of school meals on the day of service.

Specifically, FNS is interested in commenters providing details of policies and procedures in their State or schools and the advantages and challenges associated with those procedures.

FNS intends to use the information it receives to prepare a report on the feasibility of establishing national standards for meal charges and alternate meals and to provide recommendations for implementing those standards. Information submitted to FNS will also help to develop “Best Practices” guidance for meal charge policies.

Comments can be made until January 14, 2015 here: www.regulations.gov. The scope of the data collection is explained in detail at this link.

Please provide your comments to USDA-FNS. Include as many details as possible. This is an important process that will assist all school divisions around the country in addressing this issue.

FNS is seeking comments to all questions below. You may include these questions and your responses in a document which can be uploaded to the response field at the URL above. Scroll down to the “Upload File” button to upload a Word document with responses to the information requested, the school division’s charge policy, or any other information.

1. Does your school district have a written policy on meal charges and/or when alternate meals may be provided? If so, please attach your policy or a link to a Web site containing the policy to your comment.
2. Which officials are responsible for developing the policies (e.g., school district business officials, the school food service director, school principals, etc.)?
3. Are there any grade level differences; for example, are only children below high school allowed to charge meals?
4. May children who do not have their payment or who have outstanding charges/unpaid balance select any reimbursable meal or are children offered alternate meals in lieu of the selection of reimbursable meals? If alternate meals are offered, what types of foods are offered in alternate meals?
5. Are reimbursable alternate meals available? If so, at what eligibility rate is your school district claiming these meals?
6. Does your school's unpaid meal charge policy include a modified approach for handling students based on the duration of unpaid meal status, and if so, how?
7. Are there any consequences outside the meal service for students who do not have their meal payment for the day (e.g., the student may not participate in extracurricular activities or report cards are not released, etc.)?
8. How does the school ensure the children's eligibility status does not become apparent to other children or school staff as result of the school's implementation of the credit procedures?
9. Does a child's unpaid meal status become apparent to other children or school staff? If so, how? Are there measures you take to minimize the chances these children are identified and what do you find to be the most (or least) effective strategies?
10. Is any financial support to the school food service from the school district provided to offset costs related to the meal charges policy?
11. How are parents informed of the policies about charging meals, limits on charges, low account balances, outstanding balances, and methods of payment?
12. Have outstanding debts increased or decreased in your school district over the last 3 school years?
13. What steps does your school district provide to assist families with meal charges to apply for free or reduced price meals
14. Are children with outstanding debts mostly those:
 - a. Eligible for reduced price meals;
 - b. Potentially eligible for free or reduced price but who have not applied or been certified; or
 - c. Who applied but were not eligible?
15. How do outstanding meal payments affect the ability of food service to meet the meal pattern requirements?
16. Does your school district have a la carte sales? If so, are children allowed to charge these items and how is repayment of any charges handled?
17. If your school district does not have a meal charge policy, how does that affect children who do not have their meal payment for the day?

When preparing information in response to this request, please keep in mind that FNS is seeking comments within the current statutory structure of the school meals programs. For example, while serving all meals at no cost to all students would eliminate the need for credit policies; this approach would require statutory change as currently, schools may only offer all students free meals if they are operating under a Special Provision, including the Community Eligibility Provision. This approach is beyond the scope of this information request. FNS appreciates your thoughtful and responsive comments.