



Memorandum

To: Dr. Kevin McGowan, Superintendent of Schools

From: Lou Alaimo, Assistant Superintendent for Administration

Date: July 1, 2018

Re: Plan and Procedures – School Lunch Shaming Ban

Legislation was passed in the 2018 State Budget that requires all school districts that participate in the National School Lunch/Breakfast program to submit a plan to the Commissioner of Education outlining how the district will ensure children are not shamed or treated differently due to their parents/guardians having unpaid balances in the Food Service Fund.

The new law includes several detailed requirements that must be included in the plan. Below is the District's response and procedures for implementing each requirement of the law. Also attached is Board of Education policy 5660 – Meal Charging and Prohibition of Meal Shaming addressing this issue:

Plan Requirement (a) – A statement that the school or school district shall provide the student with the student's meal of choice for that school day or available reimbursable meal choices of that school day, if the student requests one (regardless of account balance or presentation of payment for the meal requested).

Compliance Procedure (a) – The District shall conspicuously present in all school lunch cafeterias a Student Bill of Rights including a statement consistent with the law. The objective of the signage is to remind students of their right to a complete reimbursable meal of their choosing and to ensure they do not feel ashamed to request such meal. Secondly, the objective of the signage is to remind Food Service staff that the children entering the school lunch line are entitled to a reimbursable meal of their choosing (based on the choices available for that day) without regard for the family's account balance or presentation of payment at the time of service.

Plan Requirement (b) – An explanation on how staff will be trained to ensure that the school or school district's procedures are carried out correctly and how the affected parents and guardians will be provided with assistance in establishing eligibility for free or reduced-price meals for their children.

Compliance Procedure (b) – The District will include in the Food Service Handbook the procedures adopted to comply with the law. The documentation shall include the required statement in Plan Requirement (a), applicable excerpts from Board policy 5660 – Meal Charging and Prohibition Against Meal Shaming; and a statement on communication/customer service directives to mitigate risk of children feeling shamed or embarrassed because of their wherewithal to pay for the full reimbursable meal of their choice on any particular day. The prohibited actions included in the law shall also be listed in the Food Service Handbook.

The District will also include such material in summary form as part of the annual required refresher training held by the District in August and at the time of orientation for employees hired during September through June.

Plan Requirement (c) – Procedures requiring the school or school district to notify the student's parents or guardian that the student meal card or account balance is exhausted and all unpaid meal charges are due.

Compliance Procedure (c) – On a daily basis, the Director, or designee will use the financial management system to generate an electronic message to families with negative balances. After one week, a letter is generated to the family stating the balance due and offers multiple payment options; after two weeks passed due, a phone call is made by the Director, or designee; and, after a third week passed due a certified letter is sent to the family and the School Principal or School Counselor calls the family. At each communication effort, assistance in establishing eligibility for free or reduced-priced lunch program is provided to the family.

Plan Requirement (d) – A communication procedure designed to support eligible families' enrollment in the National Free and Reduced-Price Meal Program. Such communication procedures shall also include a process for determining eligibility when a student owes money for five or more meals...

Compliance Procedure (d) - On an annual basis, every family in the district is provided with a copy of a free and reduced-price meal application including a cover letter offering assistance and contact information of employees who can assist with the application process. A link to the application will placed on the Food Services web page with instructions and contact information of district employees who can assist. Each effort to share the application includes an explanation of the electronic meal application process and instructions for how parents or guardians may request a paper application at no cost.

On a nightly basis, the director or designee will use the financial management system to generate an automated electronic message to families with negative balances. The Food Service Director monitors this report on a weekly basis and if an outstanding balance equals five or more meals, a phone call is made to the family sooner than prescribed in Compliance Procedure (c). In addition, the Food Service Director cross-references the family information in the NYSIS system to check eligibility for other federal programs which automatically qualifies the family for the national free and reduced-price meal

program. If the family does not respond to the phone call or is otherwise unable to be reached, a letter is sent to the family with an application and cover letter. If no response is received, a second letter and application is sent certified mail and the account is referred to the Building Principal to make contact with the family.

Plan Requirement (e) – A clear explanation of procedures designed to decrease student distress or embarrassment, provided that, no school or school district shall publically identify or stigmatize a student who cannot pay for a meal or who owes a meal debt (as prescribed in the law)

Compliance Procedure (e) – Please refer to Compliance Procedure (b).

Plan Requirement (f) – A clear explanation of the procedure to handle unpaid meal charges provided nothing in the law is intended to allow for the unlimited accrual of debt.

Compliance Procedure (f) – The District shall adopt administrative regulation 5660R which succinctly documents the procedures for handling unpaid meal charges. Such procedures shall minimally include three (3) phone call attempts from Food Service representative and/or Building Administrator or Counselor, four (4) written letters including at least two (2) certified; and one (1) formal meeting request by the Building Principal or School Counselor. At each communication effort, assistance in establishing eligibility for free or reduced-price lunch program shall be provided to the family.

Plan Requirement (g) - Procedures to enroll in the free and reduced price lunch program.

Compliance Procedure (g) – Please refer to Compliance Procedure (d).

Plan Requirement (h) - If a school or school district becomes aware that a student who has not submitted a meal application is eligible for free or reduced-fee meals, the school or school district shall complete and file an application for the student pursuant to federal regulations.

Compliance Procedure (h) – The District shall provide informational material to all building administrators and school counselors that educate them on the eligibility for the free or reduced price lunch program. They will also be directed to report to the Food Services Director the general circumstances they become aware of which may qualify a child or his/her family for free or reduced-price meal. The Director shall then cross-reference the NYSIS database and coordinate the distribution of the application with instructions and contact information.

Plan Requirement (g) - School liaisons required for homeless, foster and migrant students must coordinate with the nutrition department to make sure such students receive free school meals, in accordance with federal law.

Compliance Requirement (g) – The Director of Student Services will adopt procedures to ensure that students registered in the District's student management system as

homeless, foster, or migrant will be reported to the Food Service Director who will complete the application for free and reduced price lunch program.

The Brighton Central School District is committed to ensuring the health, safety and well-being of every child. We believe the procedures outlined in this plan are consistent with that mission and comply with Education Law § 908.

Attachment: (Policy 5660)

C: Nicole VanDerMeid, Food Services Director
Carolyn Rabidoux, Director of Student Services
Building Principals

SUBJECT: Meal Charging and Prohibition Against Meal Shaming

The District participates in the National School Lunch Program, School Breakfast Program and/or Special Milk Program to receive commodities and subsidies from the U.S. Department of Agriculture. In return, the District provides free and reduced price meals to elementary and secondary students in its schools and serves meals that meet federal requirements. The Superintendent of Schools shall promulgate procedures to ensure compliance with federal program requirements

It is the District's goal to provide students with access to nutritious no- or low-cost meals each school day and to ensure that a student whose parent/guardian has unpaid meal charges is not shamed or treated differently than a student whose parent/guardian does not have unpaid meal charges.

Unpaid meal charges place a large financial burden on the District. The purpose of this policy is to ensure compliance with federal requirements for the USDA Child Nutrition Program and to provide oversight and accountability for the collection of outstanding student meal balances to ensure that the student is not stigmatized, distressed, or embarrassed.

The intent of this policy is to establish procedures to address unpaid meal charges throughout the District in a way that does not stigmatize, distress, or embarrass students. The provisions of this policy pertain to regular priced reimbursable school breakfast, lunch and snack meals only. Charging of items outside of the reimbursable meals (a la carte items, adult meals, etc.) is expressly prohibited.

Access to Meals

- a) Free meal benefit eligible students will be allowed to receive a free breakfast at participating school(s) and lunch meal of their choice each day. A la carte items or other similar items must be paid/prepaid.
- b) Reduced meal benefit eligible students will be allowed to receive a breakfast of their choice for \$.25 and lunch of their choice for \$.25 each day. The charge meals offered to students will be reimbursable meals available to all students, unless the student's parent or guardian has specifically provided written permission to the District to withhold a meal. A la carte items or other similar items must be paid/prepaid.
- c) Full pay students will pay for meals at the District's published paid meal rate each day. The charge meals offered to students will be reimbursable meals available to all students, unless the student's parent or guardian has specifically provided written permission to the District to withhold a meal. A la carte items or other similar items must be paid/prepaid.

(Continued)

**SUBJECT: MEAL CHARGING AND PROHIBITION AGAINST MEAL SHAMING
(Cont'd.)**

Ongoing Staff Training

- a) Staff will be trained annually and throughout the year as needed on the procedures for managing meal charges using the State Education Department (SED) Webinar or the District's training program.
- b) Staff training will include ongoing eligibility certification for free or reduced price meals.

Parent Notification

Parents/guardians will be notified that a student's meal card or account balance is less than \$5.00 or is exhausted, and when a student account has accrued unpaid meal charges within two days of the charge and then at least every five (5) days thereafter.

Parent Outreach

- a) Staff will communicate with parents/guardians with five or more unpaid meal charges to determine eligibility for free or reduced price meals.
- b) Staff will make two documented attempts to reach out to parents/guardians to complete a meal application in addition to the application and instructions provided in the school enrollment packet.
- c) Staff will contact the parent/guardian to offer assistance with completion of meal application to determine if there are other issues within the household causing the student to have insufficient funds, offering any other assistance that is appropriate.

Minimizing Student Distress

- a) Staff will not publicly identify or stigmatize any student in line for a meal or discuss any outstanding meal debt in the presence of any other students.
- b) Students with unpaid meal charges will not be required to wear a wristband or handstamp, or to do chores or other work to pay for meals.
- c) Staff will not throw away a meal after it has been served because of the student's inability to pay for the meal or because of previous unpaid meal charges.
- d) Staff will not take any action directed at a student to collect unpaid meal charges.

(Continued)

**SUBJECT: MEAL CHARGING AND PROHIBITION AGAINST MEAL SHAMING
(Cont'd.)**

- e) Faculty or staff will deal directly with parents/guardians regarding unpaid meal charges.

Ongoing Eligibility Certification

- a) Staff will conduct direct certification through the New York Student Identification System (NYSSIS) or using SED Roster Upload at least monthly to maximize free eligibility.
- b) Staff will provide parents/guardians with free and reduced price application and instructions at the beginning of each school year in the school enrollment packet.
- c) If the District uses an electronic meal application, it will provide an explanation of the process in the school enrollment packet and instructions on how to request a paper application at no cost.
- d) The District will provide at least two additional free and reduced price applications throughout the school year to families identified as owing meal charges.
- e) The District will use its administrative prerogative to complete an application on a student's behalf judiciously, and only after using exhaustive efforts to obtain a completed application from the student's parent/guardian. The District will complete the application using only available information on family size and income that falls within approvable guidelines.
- f) The District will coordinate with the foster, homeless, migrant, and runaway coordinators at least monthly to certify eligible students.

Prepaid Accounts

Students/Parents/Guardians may pay for meals in advance via www.myschoolbucks.com or with a check payable to Brighton School Lunch. Further details are available on the District's webpage at www.bcsd.org. Funds should be maintained in accounts to minimize the possibility that a student may be without meal money on any given day. Any remaining funds for a particular student will be carried over to the next school year.

To obtain a refund for a withdrawn or graduating student, a written or e-mailed request for a refund of any money remaining in the student's account must be submitted. Unless otherwise requested, any remaining funds on account for students who are graduating at the end of the year will be transferred to a sibling's account.

Unclaimed funds must be requested within one school year. Unclaimed funds will then become the property of the District Food Service Program.

Adopted: 6/12/2007

Amended: