



How to talk the talk: a school food glossary

By Dana Woldow

Whether you are talking to your Principal, the director of student nutrition for your school district, a member of your Board of Education or the Superintendent, or just trying to make sense of the labyrinth of school meal regulations, there are certain terms you need to know. Among them:

NSLP – National School Lunch Program; the program was established under the National School Lunch Act in 1946, in part in response to the number of young men recruited for World War II who were found to be malnourished. In 2009, over 31 million children participated daily in the NSLP.

Read more about the [history](#) of the NSLP.

Read the Federal regulations governing the [operation of the NSLP](#).

SBP – School Breakfast Program; begun as a pilot program in 1966, the SBP was made permanent in 1975. In 2007, over 10 million children nationwide participated in the SBP daily. Read the Federal regulations governing the [SBP](#).

Main line – the breakfast or lunch line in a cafeteria which offers the reimbursable meal; the same line may also offer a la carte choices for which students must pay (or these may be available in a separate line), but "main line" refers to that day's offerings which are qualified for government reimbursement

A la carte – food or drinks sold by a school's student nutrition department which are not part of a reimbursable meal; students cannot use their free or reduced price meal eligibility to pay for these items. Common a la carte items include bottled water or juice; snacks such as chips or cookies; and alternative entrees which may not meet USDA regulations for entrees served as part of the NSLP lunch.

Reimbursement rate – the money the Federal government provides to schools for every meal they serve to students; the highest rate is for a meal served to a student qualified for *free* meals; the rate for a meal served to a child qualified for *reduced price* is 40 cents less than the free rate for lunch, and 30 cents less than the free rate for breakfast. Students on reduced price lunch are supposed to bring the 30 or 40 cent difference to pay as their contribution toward the meal, but often their families are not able to provide even that small sum, and some school districts don't even ask for this "co-pay". Students who do not qualify for either free or reduced price meals still generate a small Federal reimbursement for meals they buy in the main line (called *paid* meals); in 2010-11, the reimbursement for a "paid" breakfast or lunch is 26 cents. There is no government reimbursement for a meal served to an adult (for example, a teacher) or for items purchased a la carte.

Reimbursement rates are higher across the board for schools in Alaska and Hawaii, supposedly because their inaccessibility means higher food transportation costs; in reality, the cost of living in Alaska and Hawaii is lower than some of the more expensive mainland cities like NYC and San Francisco. Efforts to get Congress to index the reimbursement rate to take into consideration the higher cost of living in some communities have met with resistance. Interestingly, the Federal government does pay a differential to its own employees living in high cost of living communities, over what an employee in the same job category doing the exact same work earns in a lower cost of living community.

The reimbursement must cover the entire cost of providing the meal. In addition to food, there are expenses for labor (salary and benefits), and overhead (pest control for the cafeteria, utilities, maintenance of kitchen equipment, garbage collection), plus the costs of running the nutrition services department (ordering and inventory, processing free meal applications and filing the mountain of paperwork required to get the federal reimbursement.) This is why although (in 2010-11) the reimbursement for a free lunch is \$2.72, most school districts only have about \$1 of that money to spend on the food for the lunch. It also helps explain why it is misleading when a company claims to offer healthy school meals "for about the same price as the government pays for a free lunch." That healthy meal costs "about the same price" as the *entire* government reimbursement, leaving no money at all to pay for the cost of the cafeteria worker to serve the food and do the required counting and claiming (see POS), or garbage collection, or refrigeration and ovens to keep food at safe temperatures before serving (see HACCP) or processing paperwork, or anything else.

Links to reimbursement rate tables, as well as reimbursement rates for years past, are [here](#).

Temporary eligibility – Families who fill out the free lunch application form and list \$0 as their income can qualify for "temporary" free eligibility; this gives their children 8 weeks of free meals, but after 8 week, the family must fill out another application, or else the free eligibility will expire, and the children will revert to paid status. Listing *any* amount of income, instead of \$0, results in the child being qualified for free meals for the entire year, without the need to fill out a new application every 8 weeks.

Some school districts accumulate a large debt of unpaid meal "charges" which result from allowing students (who are expected to pay) to continue to eat school meals even if their parents don't pay for them; this debt worries student nutrition directors because the Federal government will only reimburse the school 26 cents (in 2010-11) for a lunch eaten by a student whose temporary eligibility has expired. One way volunteers can help their nutrition director is to help all of the families in their community understand that listing \$0 income will only qualify the child to eat free for 8 weeks, and then require a new application every 8 weeks. Volunteers can help families understand that every single dollar entering the household – even from babysitting, or a yard sale - counts as "income", so if a family can legitimately say that there was *any income at all*, then the child will qualify for a whole year's worth of free school meals, instead of just 8 weeks' worth.

Under no circumstances should a volunteer or anyone else advise a family to lie on their meal application (that would be fraud); the goal is to help families understand that when they put \$0 as their income, the child will only qualify for 8 weeks of temporary eligibility, while listing even a minimum income results in a year of free eligibility.

FBMP – food based menu planning; the two food-based menu planning approaches established by USDA, Traditional and Enhanced, that require specific food components in specific amounts for specific age/grade groups.

Read more about [FBMP](#).

NBMP – nutrient based menu planning; the two menu planning approaches, Nutrient Standard and Assisted Nutrient Standard, established by the USDA that use USDA-approved nutrient analysis software to plan school meals that meet the nutrient standards for the appropriate age/grade group.

Read more about [NBMP](#).

Component – an item from one of the four food groups that are used to determine a reimbursable meal under food based menu planning; the four groups are meat/meat alternate (another protein such as cheese), fruit/vegetable; grain/bread; and milk. Lunches under food based menu planning must include one component from each food group (2 from fruit/veg) and a student choosing a reimbursable meal under "offer vs serve" must choose at least 3 of the 5 components; for breakfast, 4 components must be offered (fruit, milk, and either 2 meat or 2 grain or 1 meat plus 1 grain) and at least 3 selected.

Offer vs serve – Also known as OVS, this is a concept that applies to menu planning and determining whether the meal a student has chosen qualifies for government reimbursement. The goals of OVS are to reduce waste and to give students a choice in what they select for their meal. OVS is mandatory for high school lunch, and a school district can choose to use it in elementary and middle school lunch, and at breakfast at all grade levels.

Using food-based menu planning, at lunch, 5 meal components must be offered (protein, grain, fruit, vegetable, and milk) and under OVS, students must select at least 3 of the 5 components in order for their lunch to qualify for government reimbursement; thus, a student cannot choose just an apple and milk (perhaps to accompany a sandwich brought from home) and have that choice count as a "free" or "reduced price" lunch. At breakfast, 4 meal components must be offered (fruit, milk, and either 2 grain, 2 protein, or 1 each grain and protein) and 3 of the 4 must be selected.

Using nutrient based menu planning, at lunch, milk, an entree and at least one side dish must be offered; for a reimbursable meal, students must choose the entree and at least one other item (if the lunch offered includes more than 3 items, students may not decline more than 2 items, and must take the entree). At breakfast at least 3 items must be offered, including milk, and a student choosing a reimbursable meal must choose at least 2 items.

Read more on [OVS](#).

POS – point of sale/point of service; the point in the cafeteria line where the cafeteria worker is able to look over a child's meal and make sure that what the student has selected qualifies as a "reimbursable meal" (see Offer vs Serve) and where the child's meal eligibility (free, reduced or paid) is properly recorded. This is also the point at which the lunch line often gets jammed up, as it takes even the most experienced caf worker a few seconds to check to make sure the lunch has the required number of components, and to record the child's eligibility. Hungry and impatient students may push right past the caf worker, resulting in improper "counting and claiming" of their meal, which may not seem like much, but is considered a Big Deal by the USDA; such behavior observed during a CRE can result in all Federal reimbursement being withheld until the school district corrects the situation and passes a follow up review (usually several months later). All meal components are supposed to be offered only "before" the POS; this is why salad bars need to be located as part of the lunch line, and not freestanding out in the portion of the cafeteria where the students sit down to eat their meal.

SFA – school food authority; the governing body (generally the school district) which has the authority to operate the National School Lunch Program and School Breakfast program in a given community. In California, only certain charter schools (those which are "direct funded", as opposed to those which are "locally funded") are able to serve as their own SFA and operate independently under the NSLP. The California Department of Education states that non-charter district schools are not allowed by federal regulations to be their own SFA. Sometimes parents or school staff imagine that they could come in as volunteers and take over meal operations at their school and serve better food to the students through their volunteer efforts; however, this is not allowed under California regulations, since only a SFA can operate a NSLP or SBP.

CN label – Child Nutrition label; this is a label found on a commercial food product which has been approved by the USDA for use in a Federal child nutrition program; the label indicates which meal requirement(s) the product provides. Without a CN label a product is not likely to be included in a school meal program, which can be a barrier to small companies which do not yet have the CN label for their product.

Read more about [CN labeling](#)

Foods of minimal nutritional value – the USDA regulations for school meal programs define FMNV as "(i) In the case of artificially sweetened foods, a food which provides less than five percent of the Reference Daily Intakes (RDI) for each of eight specified nutrients per serving; and (ii) in the case of all other foods, a food which provides less than five percent of the RDI for each of eight specified nutrients per 100 calories and less than five percent of the RDI for each of eight specified nutrients per serving. The eight nutrients to be assessed for this purpose are protein, vitamin A, vitamin C, niacin, riboflavin, thiamine, calcium, and iron." The regs then list the following short list of FMNV – soda water, water ices, chewing gum, and certain candies (hard candy, jellies and gums, marshmallow, fondant, licorice, spun candy, and candy coated popcorn)

For more detail, click [here](#) and scroll to page 68 Appendix B, very near the end of the document

HACCP – Hazard Access & Critical Control Points; this is a management system for keeping food safe, and is an essential part of school cafeteria worker training. Now mandatory in all National School Lunch Programs and School Breakfast Programs, a successful HACCP program

focuses on food safety all along the supply chain, from production of food to serving. The main risk factors for food borne illness are food from unsafe sources; poor hygiene among those who handle the food; undercooking of food; improper storage of food before serving (ie – hot food not kept sufficiently hot, or cold food sufficiently cold, to prevent the growth of bacteria); and contaminated preparation, cooking or serving equipment. A properly managed HACCP system allows a school (in the rare event of a food borne illness outbreak) to trace back the source of the contamination and ideally prevent further outbreaks. The necessity for school cafeteria workers to be fully HACCP trained is one of several reasons why the suggestion that parent volunteers could simply take over running their school cafeteria is not plausible.

Read more about [HACCP](#).

CRE and **SMI** – CRE stand for Coordinated Review Effort; this is a mandatory state inspection required by the USDA of every NSLP and SBP at least every 5 years, to make sure that free and reduced price meals are being provided to those qualified to receive them in accordance with USDA regulations, that the schools are properly "counting and claiming" the meals (that is, that every student taking a meal is recorded properly as qualified for free meals, reduced price meals, or on full paying status), and that each meal taken qualifies for reimbursement (see Offer vs Serve.)

There are many burdensome and apparently irrational regulations around what is allowed and not allowed; for example, teachers (even kindergarten teachers) may not hand the cafeteria worker a pile of meal cards for her students standing in the lunch line, even if those children are all lined up in order in front of the cafeteria worker ready to have their meal choices inspected to make sure they qualify as "reimbursable meals". The regulation is that each child must hold their own meal card in their (possibly germ) hand and give it to the lunch lady themselves. Cards can then be returned to the teacher (where germs may transfer from one card to another) for the next day's use.

Despite the fact that many teachers believe that handling of meal cards by the youngest students contributes to increased illness-related absences, and despite the fact that having adults only handing the cards would speed up the lunch line and allow the students more time to eat, if a school is found to be violating this regulation during a CRE, it counts as a strike against the school district; if enough strikes are recorded during a CRE, then the state will take corrective action and such action can include the withholding of all Federal reimbursement for school meals until a follow up review can be scheduled and the violations are no longer observed. The regulations appear to reflect a government belief that there are people who are getting rich scamming free school meals for their children.

SMI refers to the School Meals Initiative for Healthy Children, and is a mandated review of the nutritional quality of a school's meals. It can be conducted at the same time as a CRE, before the CRE, or after the CRE.

Read more about [SMI](#).

ADP – average daily participation; average number of students choosing school lunch. This is a term that your nutrition director is likely to use; ADP is the most important thing to a nutrition

director. They NEVER want to see ADP go down, and they will often be inclined to say no to a request for a change because they fear it will impact their ADP. Your goal when doing a pilot is to demonstrate that the pilot either had no impact on ADP (as in, kids did not stop eating school breakfast just because sugary cereals were not offered) or else it drove higher ADP (as in, more kids started choosing school lunch when a salad bar was offered.)

ADA – average daily attendance, used by some states to determine school funding levels. If your state bases school funding on a district's ADA, then this is an argument you can use when talking to the Superintendent or school board about why it makes financial sense for the district to support better nutrition at school. Studies that show that poor nutrition and obesity are linked to higher absenteeism, and when kids miss school, that costs the district in lost ADA money. Note that this argument does not resonate with individual Principals, because their own school funding is less reflective of ADA funding; it is the district that may have its funding linked to ADA, not an individual school.

Encroachment - The expenditure of school districts' general purpose funds in support of a categorical program, such as student nutrition, i.e. the categorical expense "encroaches" into the district's general fund for support. Student nutrition departments are supposed to be self sufficient – that is, they are supposed to generate enough revenue to support their own operations, but skyrocketing costs for food, fuel, and labor (especially medical benefits) have driven expenses, and cost of living increases to the government reimbursement rate for free and reduced meals have not kept pace. If your nutrition services department is not running in the black, or at least breaking even, then you may be told that so long as the department is "encroaching" on the general fund, the school district is not willing to incur even greater losses by spending more general fund money to pay for better quality, more expensive food. Some people prefer to refer to an "encroachment" as a "contribution" from the school district to the nutrition department or cafeteria fund; calling it a "contribution" connotes the idea that the school district is willingly underwriting the cost of running the department which exceeds the revenue generated by serving meals, while "encroachment" carries the negative connotation of being an unnecessary burden being placed on the school district.

Here are [more acronyms and frequently used terms](#).

If all of this makes your head spin, then you should have renewed respect for your school district's student nutrition director, because he or she knows and understands all of this.

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