

Nutrition Services Division Management Bulletin

Purpose: Policy Action Required Beneficial Information

To: School Nutrition Program Sponsors

Attention: Food Service Directors and Chief Business Officials

Number: SNP-05-2016

Date: January 2016

Reference: Title 2, *Code of Federal Regulations*, Part 200; Title 7, *Code of Federal Regulations*, Section 210.14(a); U.S. Department of Agriculture Policy Memorandum SP 07-2015: Assessing Proposed Nutrition Education Costs in the National School Lunch Program and School Breakfast Program

Subject: Assessing Proposed Nutrition Education Costs in the National School Lunch Program and School Breakfast Program

This Management Bulletin (MB) provides guidance on the U.S. Department of Agriculture (USDA) Policy Memorandum SP 07-2015: Assessing Proposed Nutrition Education Costs in the National School Lunch Program and School Breakfast Program. The policy memo provides guidance on the process state agencies and school food authorities (SFA) must follow when considering use of revenues from the nonprofit school food service account (cafeteria fund) for nutrition education-related expenses. SP 07-2015 is located on the USDA School Meals Policy Memos Web page at <http://www.fns.usda.gov/school-meals/policy>.

Background

The California Department of Education (CDE) is required to ensure that all cafeteria fund revenues are used solely for the operation or improvement of the school food service. When an SFA is deciding whether or not to spend cafeteria funds on nutrition education materials or activities, the SFA must first consider all free alternatives. If the SFA concludes that the only alternative is to use cafeteria funds, the SFA must submit a request for prior approval for the purchase to the CDE. The CDE will review each request for approval on a case-by-case basis.

Assessing Allowability of Costs Associated with Nutrition Education Activities

The CDE will consider the following when assessing the allowability of the SFA's use of cafeteria funds for nutrition education materials or activities:

- Title 7, *Code of Federal Regulations*, Section 210.14(a)
- Title 2, *Code of Federal Regulations*, Sections 200.402 to 200.411
- USDA Policy Memo SP 07-2015
- A written justification indicating the SFA's reasonable need for the nutrition education materials or activities

Policy and Procedure

Based on the guidance in the USDA Policy Memo SP 07-2015, the CDE developed the following procedures for SFAs requesting to use cafeteria funds for nutrition education materials and activities:

1. At least three months prior to the anticipated cafeteria fund expenditure on the nutrition education materials or activities, the SFA is required to:
 - a. Complete and submit **Form ID SNP 63, Nutrition Education Expenditure Request**, available in the Download Forms section of the School Nutrition Programs (SNP) module of the Child Nutrition Information and Payment System Web site located at <https://www.cnips.ca.gov/>.
 - b. E-mail the completed form to NutrEdExpenditure@cde.ca.gov.
2. The CDE will review each request and then notify the SFA of approval or denial by e-mail.
3. The SFA is responsible for maintaining documentation of the CDE's prior approval of the expenditure for three years and must have the approval available during their administrative review. Failure to provide this prior approval may result in the entire cost being disallowed.

Guidance on Justification for the Nutrition Education Materials or Activities

The SFA's justification for the use of nutrition education materials or activities within the SNPs is an important factor in the CDE review process. The SFA is required to provide a thorough explanation that supports their responses to the questions in Form ID SNP 63.

As specified in Form ID SNP 63, Question 6, the justification should include supporting data and citations from available studies. If there is no data available to support the effectiveness of the proposed nutrition education materials or activities, then the SFA should include an evaluation parameter to measure the effectiveness of the proposed intervention. The SFA can use this information to support future requests.

Resources

Nutrition education is an integral part of the SNPs. The CDE's [Resources to Support Nutrition Activities](#) includes examples of free or low-cost ways to support nutrition education activities, and Web links to access free downloadable nutrition education materials and curricula.

Note: **None** of the low-cost items on the resource list are preapproved; approval to expend revenue from the cafeteria fund requires a justification from the SFA as explained above.

More Information

The CDE is implementing the policy and procedure outlined above according to USDA guidance in Policy Memo SP 07-2015. Based on the review process experience and feedback from SFAs, the CDE may evaluate and revise the policy and procedures. Your feedback is always important to the CDE. If you have any questions regarding this subject or if you have feedback, please contact Mandeep Punia, Nutrition Education Consultant, by phone at 916-323-6037 or by e-mail at NutrEdExpenditure@cde.ca.gov.

If you have any questions regarding cafeteria fund policy or regulations, please contact the Resource Management Unit by e-mail at SNPCafeFundQuestions@cde.ca.gov.

Sandip Kaur, Director
Nutrition Services Division