



Adopted: 02/2016
Revised:

Wellness Policy (National School Lunch Program)

Saint Paul Parochial School recognizes that healthy eating patterns and increased physical activity are essential for students to achieve their academic potential, full physical and mental growth and lifelong health and well-being. To help ensure students possess the knowledge and skills necessary to make healthy choices for a lifetime, Saint Paul Parochial School's Student Advisory Council (SAC) has prepared and implemented a Wellness Policy consistent with state and federal requirements for districts sponsoring the National School Lunch Program (NSLP). The program shall reflect the Student Advisory Council's commitment to providing time for instruction to promote healthy eating through nutrition education and serving healthy and appealing foods at school.

Saint Paul Parochial School's nutrition and food services will be operated in accordance with the following requirements:

Nutrition Promotion and Education

Nutrition promotion supports the integration of nutrition education throughout the school environment. Nutrition education topics shall be integrated into the health education curriculum taught at Saint Paul Parochial School, as well as other subject areas as appropriate, and will incorporate the Oregon Department of Education's health education content standards.

Nutrition Guidelines

Saint Paul Parochial School recognizes that the nutrition program is an essential educational and support activity. If any foods would be sold on the campus during the school day, they will be evaluated using the Oregon Smart Snack calculators to confirm they meet the state and federal requirements.

Physical Activity

Saint Paul Parochial School realizes that a quality physical education program is an essential component for all students to learn about and participate in physical activity. Physical activity should be included in a school's daily education program. Physical activity should include structured regular instructional physical education as well as co-curricular activities as well as non-structure recess time. Saint Paul Parochial School and St. Paul School District will deliver instruction to students following the Oregon Department of Education's physical education content standards.

Other School-Based Activities

Saint Paul Parochial School will promote school and community-based activities that foster healthy eating and create environments that promote physical activity. Families and the community will be encouraged to provide healthy food choices in all situations where food is served. Educational workshops, screenings and literature related to healthy food choices and physical activity may be offered to families.

Evaluation of the Local Wellness Policy

Saint Paul Parochial School will involve staff (including but not limited to, physical education and school health professionals), parents, students, representatives of the school food authority, public health professionals, school administrators and the public in the development, implementation and periodic review and yearly update of this policy. Saint Paul Parochial School establishes a Wellness Advisory Committee to advise the district in the creation of the local wellness policy. The policy will be reviewed every three years.

In an effort to measure the implementation of this policy the Saint Paul Parochial School designates the school principal as the person who will be responsible for ensuring each school meets the goals outlined in this policy. Saint Paul Parochial School will make available to the public annually, an assessment of the implementation, including the extent to which the school's is in compliance with policy, how the policy compares to model policy and a description of the progress being made in attaining the goals of this policy.

National School Lunch Program Operations

Reimbursable School Meals

St Paul Parochial School has entered into an agreement with the Oregon Department of Education (ODE) to operate reimbursable National School Lunch Program. The school principal will develop administrative regulations as necessary to implement this policy and meet the requirements of state and federal law. These guidelines shall not be less restrictive than regulations and guidance

Meal Pricing Procedures

1. Reimbursable meals served as Lunch will be priced as a unit.
2. Reimbursable meals served as Lunch will be served free or at a reduced price to all children who are determined by Saint Paul Parochial School to be eligible for free or reduced-price meals.
3. Annually, Saint Paul Parochial School will establish prices for reimbursable student meals served as Lunch. The price charged to students who do not qualify for free or reduced-price meals will be established annually by Saint Paul Parochial School, in compliance with state and federal laws.¹
4. The price charged to students who qualify for reduced-price meals will be established annually by Saint Paul Parochial School in compliance with state and federal laws.²

Application Procedures

1. Households receiving Supplemental Nutrition Programs (SNAP) or Temporary Assistance to Needy Families (TANF) benefits, as identified by Oregon Department of Education (ODE), will be automatically eligible for free meals served as Lunch for the students listed on the official document. Saint Paul Parochial School must access this document.

¹ The new requirement under Healthy, Hunger-Free Kids Act of 2010, 42 U.S.C. 1751 § 205 establishes new criteria for equity in school lunch pricing.

² According to Direct Certification and Certification of Homeless, Migrant and Runaway Children for Free School Meals, 7 C.F.R. Part 245 (2011).

2. Households that submit a confidential application will be notified of their student's eligibility for free or reduced-price meals. Households that are denied free or reduced-price benefits will be notified in writing using the template letter distributed to the school annually.
3. On a case-by-case basis, when a student is known to be eligible for free or reduced-price meal benefits, and the household fails to submit a confidential application, the Principal may complete an application for the student documenting how he/she knows the household income qualifies the student for free or reduced-price benefits. Parents of a student approved for free or reduced-price benefits, when application is made for the student by a school official, will be notified of the decision and given the opportunity to decline the benefits.
4. Students who do not qualify for free or reduced-price meals are eligible to participate in the National School Lunch Program (NSLP), and will be charged "paid" prices set by Saint Paul Parochial School.
5. Saint Paul Parochial School has established a fair hearing process under which a household can appeal a decision with respect to the household's application for benefits or any subsequent reduction or termination of benefits.
6. In the event of major employers contemplating large layoffs in the attendance area of Saint Paul School District, the school will provide confidential application and eligibility criteria for free and reduced-price meals to the employer for distribution to affected employees.

Financial Management of the Nonprofit School Food Service

1. Saint Paul Parochial School will maintain a nonprofit school nutrition and food service operation.
2. Revenues earned by the school nutrition and food service department will be used only for the operation or improvement of NSLP.
3. Lunch meals served to teachers, administrators, custodians, and other adults not directly involved with the operation of the Saint Paul Parochial School's nutrition and food services will be priced to cover all direct and indirect costs of preparing and serving the meal. ³
4. Saint Paul Parochial School nutrition and food services revenues will not be used to purchase land or buildings.

³ For meals with portion sizes equivalent to student meals, the adult meal price will be no less than the amount of reimbursement for a free-eligible meal, plus the value of commodity foods used in the meal preparation.

5. Saint Paul Parochial School will limit its nutrition and food services net cash resources to an amount that does not exceed three months average expenditures.
6. Saint Paul Parochial School will maintain effective control and accountability for, and adequately safeguard, all nutrition and food services' cash, real and personal property, equipment, and other assets, and ensure they are used solely for nutrition and food services purposes.
7. Saint Paul Parochial School will meet the requirements for allowable NSLP costs.
8. In purchasing nutrition and food services goods or service, Saint Paul Parochial School will not accept proposals or bids from any party that has developed or drafted specifications, requirements, statements of work, invitations for bids, requests for proposals, contract terms and conditions, or other documents for proposals used to conduct the procurement.
9. All procurement transactions for nutrition and food services goods and services will be conducted according to state, federal, and Saint Paul Parochial School standards procurement standards using the applicable cost thresholds.
10. In the operation of its nutrition and food services program, the St. Paul School District will purchase food products that are produced in the United States, whenever possible.
11. Saint Paul Parochial School may use facilities, equipment, and personnel supported with nutrition and food services revenue to support a nonprofit nutrition program for the elderly.

Civil Rights and Confidentiality Procedures

1. Saint Paul Parochial School will not discriminate against any student because of his/her eligibility for free or reduced-price meals.
2. Saint Paul Parochial School will not discriminate against any student or any nutrition and food services employee because of race, color, religion, sex, sexual orientation, parental status, national origin, marital status, disability, or age.
3. Saint Paul Parochial School will assure that all students and nutrition and food services employees are not subject to different treatment, disparate impact, or a hostile environment.
4. Established school procedures will be followed for receiving and processing civil rights complaints related to applications for NSLP benefits and services, and employment practices with regard to the operation of its NSLP. Saint Paul Parochial School will forward any civil rights complaint regarding the nutrition and food services to ODE's civil rights coordinator within three working days of receiving the complaint.

5. Saint Paul Parochial School will make written or oral translations of all nutrition and food services materials available to all households who do not read or speak English.
6. Saint Paul Parochial School will maintain strict confidentiality of all information on the confidential application for free and reduced-price meals, including students' eligibility for free or reduced-price meals and all household information. Saint Paul Parochial School's NSLP operators are not required to release any information from a student's confidential application for free or reduced-price meals. No information may be released from a student's confidential application for free or reduced-price meals without first obtaining written permission from the student's parents or legal guardians/adult household member signing the application, except as follows:
 - a. An individual student's name and eligibility status may be released without written consent only to persons who operate or administer federal education programs; persons who operate or administer state education or state health programs at the state level; persons evaluating state education assessments; or persons who operate or administer any other NSLP, SBP, Summer Food Service Program (SFSP), Child and Adult Care Food Program (CACFP), or the Food Stamp Program;
 - b. Any other confidential information contained in the confidential application for free and reduced-price meals (e.g., family income, address, etc.) may be released without written consent only to persons who operate or administer NSLP, SBP, CACFP, or SFSP; the Special Supplement Nutrition Program for Women, Infants, and Children (WIC); the Comptroller General of the United States for audit purposes; and federal, state, or local law enforcement officials investigating alleged violation of any of the programs listed above.

Nutrition and Menu Planning

1. Meals served as Lunch for reimbursement will meet the recommendations of the most current *Dietary Guidelines for Americans*.
2. Meals served as Lunch for reimbursement will meet at least the minimum NSLP requirement for food item and quantities.
3. Meals served for reimbursement will:
 - a. Meet all calorie range requirements by grade level;
 - b. Meet the maximum standards set for saturated fat;

- c. Meet the maximum standards set for sodium by grade level; and
 - d. Meet the requirement for zero grams of Trans fats.
4. Saint Paul Parochial School will use the “Offer versus Serve” option when serving NSLP lunches to all students. All students must take at least three of five different food items including one-half cup of fruit or vegetable or fruit/vegetable combination offered in program lunches.
5. A copy of the minutes adopting the offer versus serve policy for all students in Saint Paul Parochial School for NSLP program, as applicable, will be made available upon request.

Accuracy of Reimbursement Claims

1. Saint Paul Parochial School will claim reimbursement only for reimbursable meals served as Lunch to eligible children.
2. All meals served as Lunch claimed for reimbursement will be counted at the dining site at a “point of service,” where it is accurately determined that the meal meets reimbursable meal requirements under NSLP.
3. The person responsible for determining if the meals served as Lunch qualifies for reimbursement will be trained to recognize a reimbursable meal.
4. The official signing Saint Paul Parochial School’s claim for reimbursement will review and analyze monthly meal counts for Lunch to ensure accuracy of the claim before submitting the claim to ODE.
5. Annually, starting October 1st and ending by November 15, Saint Paul Parochial School will verify a random sample of application according to NSLP verification requirements. Instructions for completing the verification process will be sent by ODE to Saint Paul Parochial School in September/October each year.

Food Safety and Sanitation Inspections

1. Saint Paul School District will maintain necessary facilities for storing, preparing, and serving food and milk.
2. Saint Paul School District will schedule semiannual food safety inspections with the county Environmental Health Department or Oregon Department of Human Resources for each school or dining site under its jurisdiction.
3. Saint Paul School District will maintain health standards in compliance with all applicable state food safety regulations at each school or dining site under its jurisdiction.

4. Saint Paul SD will provide copies of the two required food safety and sanitation inspections to Saint Paul Parochial School to keep as program records.

General USDA NSLP Requirements

1. Saint Paul Parochial School will ensure that no student is denied a meal as a disciplinary action.
2. Lunch will be served between the hours of 10 A.M. and 2 P.M.
3. Saint Paul Parochial School will provide substitute foods for students who are determined by a licensed physician to be legally disabled and whose disability restricts their diet. Substitutions will be provided only when a medical statement from the licensed physician is on file at the school. The medical statement must state the nature of the child's disability and how the disability affects the child's nutrition needs, and it must provide a medical prescription for substitute foods or texture modifications. Saint Paul Parochial School will not charge more than the price of the school meal, as determined by the child's eligibility status, for substitute meals or foods.
4. Saint Paul Parochial School will control the sale of competitive foods.
5. Saint Paul Parochial School will ensure that potable drinking water will be available to students, free of charge, for consumption in the place where meals are served during the meal service.⁴
6. Saint Paul Parochial School will notify all households of its meal-charge requirements in the student handbook each school year.
7. The sale of food in competition with Saint Paul Parochial School's lunch (NSLP) program will be allowed in dining sites during lunch period with Saint Paul School District approval only when all income from the food sales accrues to the benefit of the Saint Paul Parochial School's nutrition and food services program, or accrues to a school or student organization approved by the Saint Paul School District Board, *and only when the food items for sale fulfill the Oregon Smart Snacks standards*. A copy of the Board minutes approving and defining competitive food sales will be made available upon request. Food sales must be in compliance with state and federal guidelines.

⁴ New requirement under Healthy, Hunger-Free Kids Act of 2010, 42 U.S.C. 1751 § 203.

Record Keeping

The following document will be maintained by Saint Paul Parochial school for three years after the current school year or longer, in the event of an unresolved audit(s), until the audits have been completed:

1. All currently approved and denied confidential application for free and reduced price meals {free milk} and all current direct certification documents;
2. Financial records that account for all revenues and expenditures of the district's nonprofit nutrition and food services programs;
3. Records (i.e., recipes, ingredients listed and nutrition facts labels or product specifications) that document the compliance with nutrition standards for all competitive foods available for sale to students at a school campus;
4. Documents of participation data (i.e. meal counts) to support claims for reimbursement;
5. Production and menu records; (these are kept by Saint Paul SD's nutrition services as the district and Saint Paul Parochial School students are served the same menu)
6. Records to document compliance with Paid Lunch Equity; and
7. Records to document compliance with Revenue from Non-program Foods.