

Afterschool Snacks in RCCI's

Residential Child Care Institutions (RCCI's)

- 1. Are all residential child care institutions including juvenile detention centers eligible for the afterschool snack provision or just residential child care institutions which also have a day care component?**

Any residential child care institution that participates in the NSLP/SBP may participate as long as the residential child care institution operates an afterschool care program with enrichment or education activities.

- 2. When determining the reimbursement status of residential child care institutions, should the State agency consider the percentage of free and reduced-price children enrolled in the institution or the percentage of free and reduced-price children enrolled in the local public school?**

As schools, residential child care institutions will routinely receive free reimbursement for all snacks based on the fact that more than 50 percent of their enrolled children are eligible for free or reduced-price school meals. In the unlikely event that a residential child care institution cannot qualify for the free rate for all snacks based on its enrollment, the residential child care institution could still qualify by using enrollment data from a school serving the area in which the institution is located.

- 3. Can afterschool care programs operated by residential child care institutions claim reimbursement for snacks served during weekends, holidays and school vacations?**

Congress intended this provision to apply to snacks served in schools after an educational activity. If no regularly scheduled education activity is taking place, as is generally the case on weekends, holidays and vacations, reimbursement cannot be claimed for snacks served on those days. In this respect, residential child care institutions are subject to the same provisions as any other school. They may not claim reimbursement for snacks served on weekends, holidays or vacation periods unless the snack is served during an activity that takes place after an education activity that is determined to be an integral part of the curriculum or an actual extension of the local education system. This limitation on snack eligibility differs from the general authorization of reimbursement for lunches and breakfasts served in residential child care institutions due to the special nature of the afterschool snack benefit.

- 4. Can preschool children enrolled in residential child care institution afterschool care program have reimbursable snacks?**

Yes, just as in any other school.

- 5. Under the current lunch/breakfast program regulations, residential child care institutions may be reimbursed for meals served to children who have not yet reached their 21st birthday. However, children who turn 19 during the school year may continue to participate in the snack program rather than becoming ineligible immediately upon reaching their 19th birthday. Is this inconsistency intentional?**

The age requirements for participation under the afterschool snack provision are somewhat different from those established for the NSLP and SBP in general. The law limits participation in the snack provision to children 18 years old and under. However, to reduce paperwork and ease administrative burdens on local administrators, Congress, in the conference report, authorized schools to continue receiving reimbursement for snacks served to children who become 19 during the school year ending the following June 30. This provision applies to residential child care institutions as well as all other schools. It must be emphasized that, under no circumstances, can a residential child

care institution continues to be reimbursed for snacks served to children after the school year in which they become 19, and students continue to become ineligible for reimbursable lunches or breakfasts as soon as they reach 21.

6. Can a residential child care institution claim reimbursement for a snack served to a child who did not attend school that day (e.g., the child was ill)?

It would depend on whether the child is participating in an approved afterschool care program on that day. If the child is participating in the approved afterschool care activity, it doesn't matter that he may not have been in school. As with other schools, there is no requirement or expectation for tracking whether the child attended school on any given day.

If the afterschool care activities occur late in the afternoon and coincide with the evening meal service, may the residential child care institution claim that meal as a snack?

Congress intended the afterschool snack to be an additional food benefit that, likely, would not otherwise be available to children. Therefore, if a residential child care institution already has a scheduled evening meal service, as would generally be the case, it would have to serve a separate snack as an additional offering at some other time during the afternoon or evening in order to receive reimbursement. The snack can be served either before or after the supper.