---------- Forwarded message ---------  
From: **Krueger, Mary** <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)>  
Date: Thu, Jan 23, 2020 at 9:41 AM  
Subject: RE: Question that I am hoping you can assist with  
To: carolyn partridge <[carolyn.w.partridge@gmail.com](mailto:carolyn.w.partridge@gmail.com)>  
Cc: William Anton <[wanton@windhamcentral.org](mailto:wanton@windhamcentral.org)>

Hi Carolyn,

It’s great that you’re already trying to feed the students.  Since you’re making these efforts already, I think we could likely incorporate what you’re doing under the federal programs and get you some funding for the work you’re already doing – and that might be enough to allow you to offer lunch on the 3 additional days at no additional cost.  Here’s an example:

It looks like your average daily attendance is 22 students.  We don’t have a free and reduced percentage for your school, but if we assume the state-wide average of 40% free and reduced, you would have 8 students who qualify for free and reduced price reimbursement, and meals for the other 14 students would be reimbursed at the paid rate.  That means that for the breakfasts you are already serving every day (assuming they meet our nutritional requirements), we could be paying you $95.30 each week.   If you are serving lunch to all students twice per week, we could be paying you $63.52 per week in reimbursement.  Over the course of the year, you would be receiving $5,717.52 for the meals you are already serving, plus an additional $574 in USDA Foods.  If you added 3 more days of lunch, that would be an additional $95.28 per week (or $3,430.08 per year) in reimbursement and an additional $861 per year in USDA Foods.  There’s a lot of federal and state money there that you’re missing out on!

This calculation would of course change depending on how many students actually did qualify for free and reduced meals – if the school is higher poverty than the state average, the reimbursement would be even higher, if it is lower, the reimbursement would be lower – but that should give you a starting point.  I also made the assumption that every student is eating the meal whenever the meals are offered.  If your participation rates were lower because some students bring meals from home, that would reduce the reimbursement as well.  If you are only offering breakfast twice per week currently, that would change the calculations a little as well – I couldn’t quite tell from your email.

The next consideration is to see how far the meals that you are already serving are from meeting our nutritional requirements.  Again, Chris Parker would be an excellent resource for you to start with, but our office can provide support in this area as well.  In terms of the general need for technical assistance – that’s what my office is here for!  We have a team of child nutrition consultants who assist schools with understanding and complying with the federal program regulations.

Finally, whether you come on our programs or not, I want to encourage you to make sure that who ever is cooking the meals for the students has food safety training.  The Institute for Child Nutrition offers [a free online food safety training](https://theicn.docebosaas.com/learn/course/external/view/elearning/21/FoodSafetyinSchools).  We also periodically offer free ServSafe training – there’s one of those coming up at the [end of January in Rutland](https://creator.zohopublic.com/cheryl_4.3.68/servsafe-trainings/form-perma/Home/uM5HRnJMrnKdSbDsYhjK8x7TeDBw7ydrRkqM0qfWyxwaAC0taGxAW98nHRrx2YTPT67A8Jqd7uBdWtyNFrXA6GaWHzvEzHKP1qG5).

Best,

Rosie

Rosie Krueger, State Director of Child Nutrition Programs, Vermont Agency of Education

(pronouns: she, her, hers)

Phone: 802-828-1589

Fax: 802-828-6433

Mailing Address: 1 National Life Drive, Davis 5, Montpelier, VT 05620-2501

Email: [Mary.Krueger@Vermont.gov](mailto:Mary.Krueger@Vermont.gov)

Vermont Child Nutrition Programs Website: <http://education.vermont.gov/student-support/nutrition>

Connect with AOE on [Twitter](https://twitter.com/vteducation), [Facebook](https://www.facebook.com/VTEducation), or the [Web](http://education.vermont.gov/)

**As of November 12, all Agency of Education staff have relocated from Barre to offices on the National Life campus in Montpelier. Please note the new address and phone number. For information on how to contact or visit us in our new location, please see the** [**Contact Us**](https://education.vermont.gov/about-us/contact-us) **section of our website.**

**From:** carolyn partridge <[carolyn.w.partridge@gmail.com](mailto:carolyn.w.partridge@gmail.com)>   
**Sent:** Wednesday, January 22, 2020 7:49 PM  
**To:** Krueger, Mary <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)>  
**Cc:** William Anton <[wanton@windhamcentral.org](mailto:wanton@windhamcentral.org)>  
**Subject:** Re: Question that I am hoping you can assist with

 Thanks, Rosie, we’ll need to discuss this at our school board meeting in Feb. At this point our students are all getting a free breakfast prepared by our principal and lunches twice a week, I think. If we were to opt out of the program could we continue to do what we have been doing? Windham is way over the penalty threshold due to unreimbursed pre-k special ed costs and we can’t afford anything else.

As chair of the House Agriculture and Forestry Committee I understand the importance of good nutrition and full bellies. I think you have testified in front of my committee on Farm to School. To take on a meal program in Windham, however, it will take a lot of funding, not from Windham, and technical assistance to deal with the logistics. Thanks for your response, Carolyn

Sent from my iPhone

On Jan 22, 2020, at 10:45 AM, Krueger, Mary <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)> wrote:

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Hi Carolyn,

There is some funding.  The federal and state government provide a combined total reimbursement of $3.41 per lunch for lunches served to students who qualify for “free and reduced” meals, and 32 cents per lunch served to students who don’t qualify (we call these “paid” students).  In addition, the federal government provides approximately 36 cents worth of USDA Foods for every lunch served to students (USDA Foods include fresh produce options as well as frozen and canned fruits, vegetables, meats, cheese and whole-grain items).  The USDA Foods would be delivered to the location preparing the meals.  For breakfast, the federal and state government provide a combined total of $1.84 per breakfast for students who qualify for free and reduced meals, and 31 cents per breakfast for paid students.  The expectation is that you charge the paid families (usually about $3 per lunch and $2 per breakfast).  You cannot charge free and reduced families for the meals.  If you want to provide free meals to all students (as some other schools in your SU are doing), you would need to come up with general funds or other non-federal funding to cover the cost of the meals for the paid students.  There is also some “state match” money that is paid out once per year – in prior years that has been an additional 7 cents per breakfast and 11 cents per lunch served from July-December – however, the legislature increased the lunch amount a little this year, so it will be a few cents more than that.  All of these funds can be used for both the production of the meal itself, plus the transportation of the meal to the school, if necessary.  I’d encourage you to have a discussion with the SU food service director, Chris Parker, to fund out what the per meal production cost would be if he produced the meals in one of his kitchens, and then the remainder, if any, could be used for the transportation costs. If the state, federal, and paid amounts from families do not cover the costs, then you would need to come up with general funds or other non-federal funds for the remainder.

Are any of the Windham high school students transported to Leland and Gray or another high school?  If so, it may be possible to send the meals back from the high school in coolers on the return trip and keep them refrigerated at Windham until the meal service time.   Or if there’s an educator or nurse who travels between the schools, that might be an option as well.  There is no requirement that the meal be a hot meal – sandwiches, etc. are fine – although participation certainly increases when hot meals are offered.

There are state and federal equipment grants available for kitchen equipment, as well as some state farm to school grant funding that can be used for equipment.  None of them are open at the moment, but we expect a round of federal equipment grants to open at the end of this month, and a round of state equipment grants to open in April.  These grants could be used for both kitchen equipment, or for transportation equipment (hot holders, coolers, re-warming equipment, etc.).  Vehicles are allowed purchases as well, however the federal grant is capped at $15,000 and the state grant is a matching grant, so you would certainly incur costs for a vehicle purchase.  There is also a larger USDA rural development grant/loan program that could be used for kitchen construction or improvement: <https://www.rd.usda.gov/programs-services/community-facilities-direct-loan-grant-program>.

Regarding the general hurdle that you don’t have a commercial kitchen – our programs require that the kitchen be inspected by the Department of Health, but we don’t actually have a specific requirement that it be a commercial kitchen.  I would suggest reaching out to the Department of Health and asking them to do a visit and advise you on what they would want to see in order for you to pass a health inspection – it is possible it won’t be as difficult as folks have assumed in the past.  You can contact them to request a consultation at [FoodLodging@vermont.gov](mailto:FoodLodging@vermont.gov).  The Department of Health does not charge schools for this service.  You could also see if there is an appropriate kitchen at your town hall or local fire department that already is or could be inspected by the Department of Health.

Please let me know if you have more questions!

Best,

Rosie

Rosie Krueger, State Director of Child Nutrition Programs, Vermont Agency of Education

(pronouns: she, her, hers)

Phone: 802-828-1589

Fax: 802-828-6433

Mailing Address: 1 National Life Drive, Davis 5, Montpelier, VT 05620-2501

Email: [Mary.Krueger@Vermont.gov](mailto:Mary.Krueger@Vermont.gov)

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**From:** carolyn partridge <[carolyn.w.partridge@gmail.com](mailto:carolyn.w.partridge@gmail.com)>   
**Sent:** Tuesday, January 21, 2020 7:53 PM  
**To:** William Anton <[wanton@windhamcentral.org](mailto:wanton@windhamcentral.org)>  
**Cc:** Krueger, Mary <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)>  
**Subject:** Re: Question that I am hoping you can assist with

Thanks, Bill, for looking into this for us. My question for Mary is who provides the funding for these meals including transportation? Windham is 12 miles up a steep hill from Townshend. In other words, we are geographically isolated, and the transportation is significant. Is there funding for a proper kitchen so that we can prepare meals ourselves? Thanks for letting me know the answers to these questions, Carolyn

Sent from my iPad

On Jan 21, 2020, at 11:22 AM, William Anton <[wanton@windhamcentral.org](mailto:wanton@windhamcentral.org)> wrote:

Thank You Rosie. I will ask the Windham School Board to put this on their agenda to discuss what path forward they would like totake.

You have been very helpful.

Bill

On Tue, Jan 21, 2020 at 10:28 AM Krueger, Mary <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)> wrote:

Hi Bill,

There is a Vermont law that requires participation in the programs, however there is an exemption process.  We do not have exemption documentation on file for Windham Elementary, although we are aware that they only participate in Special Milk and do not offer the meals program.  It doesn’t look like you have followed the exemption process (although I don’t believe we haven’t notified you that you’re out of compliance).  I’ll include the requirement and exception citations below.

The suggestion for schools without kitchens is to do satellite meals from another school or commercial kitchen location.  You could do this within your School Food Authority by preparing meals at Leland and Gray, Townshend, or Jamaica.  Or, if it makes more logistical sense, you could enter into a vended meals agreement with Bennington-Rutland, Two-Rivers, or Windham Northeast to bring in meals from one of their sites.  If it doesn’t make sense for any of the schools in the area to vend meals, you could look at getting vended meals from a hospital or even a nursing home.  However, school vendors are a lot easier because you don’t have to go through a procurement process and they are already serving meals that meet our requirements.  You need to follow food safety requirements in transporting the meals (coolers or hot holders), and the person serving the meals at Windham would need some training (the amount of training depends on whether you provide the meals as a unitized meal with all the components included for each student, or if you are offering the students options using offer vs. serve).

We would be happy to help you or your staff brainstorm the best way to provide meals to students at Windham – just let us know what assistance you need.

Here are the requirements:

16 V.S.A. § 1264

*(a)(1) Each school board operating a public school shall cause to operate within the school district a food program that makes available a school lunch, as provided in the National School Lunch Act as amended, and a school breakfast, as provided in the National Child Nutrition Act as amended, to each attending student every school day.*

And then then the exemption process:

16 V.S.A. § 1265

*(a) The school board of a public school district that wishes to be exempt from the provisions of section 1264 of this title may vote at a meeting warned and held for that purpose to exempt itself from the requirement to offer either the school lunch program or the school breakfast program, or both, for a period of one year.*

*(b) If a public school is exempt from offering a breakfast or lunch program, its school board shall conduct a discussion annually on whether to continue the exemption. The pending discussion shall be included on the agenda at a regular or special school board meeting publicly noticed in accordance with 1 V.S.A. § 312(c), and citizens shall be provided an opportunity to participate in the discussion. The school board shall send a copy of the notice to the Secretary and to the superintendent of the supervisory union at least ten days prior to the meeting. Following the discussion, the school board shall vote on whether to continue the exemption for one additional year.*

*(c) On or before the first day of November prior to the date on which an exemption voted under this section is due to expire, the Secretary shall notify the boards of the affected school district and supervisory union in writing that the exemption will expire.*

*(d) Following a meeting held pursuant to subsection (b) of this section, the school board shall send a copy of the agenda and minutes to the Secretary and the superintendent of the supervisory union.*

*(e) The Secretary may grant a supervisory union or a school district a waiver from duties required of it under this subchapter upon a demonstration that the duties would be performed more efficiently and effectively in another manner.*

Best,

Rosie

Rosie Krueger, State Director of Child Nutrition Programs, Vermont Agency of Education

(pronouns: she, her, hers)

Phone: 802-828-1589

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**From:** William Anton <[wanton@windhamcentral.org](mailto:wanton@windhamcentral.org)>   
**Sent:** Friday, January 17, 2020 8:37 AM  
**To:** Krueger, Mary <[Mary.Krueger@vermont.gov](mailto:Mary.Krueger@vermont.gov)>  
**Cc:** carolyn partridge <[carolyn.w.partridge@gmail.com](mailto:carolyn.w.partridge@gmail.com)>  
**Subject:** Question that I am hoping you can assist with

I have a school, Windham Elementary, They do not have an approved kitchen which is a requirement to be able to prepare meals. I am wondering if they have to, by law, participate in the National School Lunch Program. They participate in the special milk program currently..

I have a parent inquiring and I want to be able to provide accurate information.

I am also copying the Board Chair, Carolyn Patridge, to keep her in the loop.

Thanks for any and all help.

Bill Anton

Superintendent

Windham Central SU