

# Exhibit 25

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**Policy 8500 – Food Service Program (Replacement)**

**Policy 8510 – Wellness (Revised)**

**Policy 8540 – Vending Machines (Rescinded)**



Book	Policy Manual
Section	Policies for Board 37-2
Title	Copy of Replacement Policy - Vol. 37, No. 2 - April 2025 - FOOD SERVICE PROGRAM
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### **Replacement Policy - Vol. 37, No. 2 - April 2025**

#### **8500 - FOOD SERVICE PROGRAM**

The School Board will provide cafeteria or serving facilities in all schools where space and facilities permit and food service for the purchase and consumption of lunch for all students.

It is the intent of the Board to participate in the National School Lunch and School Breakfast Program and to offer paid, free, or reduced-price meals in accordance with the Child Nutrition Program, the National School Lunch Act, and Indiana law. The operation of the food service program shall also be in compliance with the regulations set forth in State law and regulations.

Students who are eligible for free or reduced-price meals shall be approved and properly accounted for by the Principal in accordance with criteria established by the Child Nutrition Program and National School Lunch Act. The Board requires that the identity of students receiving free or reduced-price meals be safeguarded and kept confidential.

The operation and supervision of the food service program shall be the responsibility of the (X) School Nutrition Program Director ( ) [END OF OPTION]. The School Corporation will adhere to the professional standards for school nutrition personnel who manage and operate the food service program, including the requirements related to hiring and training that are set forth in United States Department of Agriculture ("USDA") regulations.

Further, as required by USDA regulations and upon recommendation of the Superintendent, the Board shall certify annually:

- A. the (X) School Nutrition Program Director ( ) meets the hiring standards and training requirements set forth in USDA regulations; and
- B. each employee in the food service program has completed the applicable training requirements set forth in USDA regulations.

The Food Service program will comply with Federal and State laws and regulations pertaining to the selection, preparation, consumption, and disposal of food and beverages, including but not limited to the current USDA school meal pattern requirements and the USDA Smart Snacks in School nutrition standards, as well as to the fiscal management of the program. Further, the food-service program shall comply with Federal and State laws and regulations pertaining to the fiscal management of the program as well as all the requirements pertaining to food service hiring and food service manager/operator licensure and certification. In addition, as required by law, a food safety program that is based on the principles of the Hazard Analysis and Critical Control Point (HACCP) system shall be implemented with the intent of preventing food-borne illnesses. For added safety and security, access to the facility and the food stored and prepared therein shall be limited to food service program staff and other authorized persons.

Further, the Food Service program shall comply with the School Lunch Fund provisions of Chapter 4 of the State Board of Accounts *Uniform Compliance Guidelines for Indiana Public School Corporations*.

The superintendent shall recommend and the Board shall approve the cost of meals for elementary, middle, and high schools annually.

### **School Breakfast**

#### **☒ ] OPTION 1**

School breakfast meals shall be made available to students at all schools in the Corporation. Each elementary, middle, and high school shall make a breakfast meal available if a student arrives at school on the bus less than fifteen (15) minutes before the first bell rings and shall allow the student at least fifteen (15) minutes to eat the breakfast.

**[END OF OPTION 1]**

#### **☐ ] OPTION 2**

~~School breakfast meals shall be made available to students at all schools that serve any combination of grades kindergarten through five (5).~~

~~☐ Additionally, the Board shall provide breakfast meals in all schools in which eighty percent (80%) or more of the students are eligible for free or reduced-price meals. **[END OF OPTION]**~~

~~☐ Breakfast meals shall be available if a student arrives at school on the bus less than fifteen (15) minutes before the first bell rings and shall allow the student at least fifteen (15) minutes to eat the breakfast.~~

~~**[END OF OPTION 2]**~~

~~**[END OF OPTIONS]**~~

### **Summer Food Service**

The Board shall provide a Federal food service program for students during summer intervention programs that are mandated under Federal law. If the Board determines that it is unable to provide a Federal food service program during the summer for financial reasons, the Board will communicate that decision to its residents in a manner it determines to be appropriate.

### **Nutrition Standards**

The Board shall approve and implement nutrition standards governing the types of food and beverages that may be sold on the premises of its schools and shall specify the time and place each type of food or beverage may be sold.

In adopting such standards, the Board shall:

- A. consider the nutritional value of each food or beverage;
- B. consult with a dietitian licensed under I.C. 25-14.5-4, a dietetic technician registered with the Commission on Dietetic Registration, or a school nutrition specialist certified or credentialed by the School Nutrition Association;
- C. consult and incorporate to the maximum extent possible the dietary guidelines for Americans jointly developed by the USDA and the United States Department of Health and Human Services; and
- D. consult and incorporate the USDA Smart Snacks in School nutrition guidelines.

The Corporation's food service program shall serve only food items and beverages determined by the Food Service Department to be in compliance with the current USDA Dietary Guidelines for Americans and the USDA Smart Snacks in School nutrition guidelines.

The Superintendent shall require that the food service program serve foods in the schools of the Corporation that are wholesome and nutritious and reinforce the concepts taught in the classroom.

The Superintendent is responsible for implementing the food service program in accordance with the adopted nutrition standards and shall provide a report annually to the Board at one of its regular meetings regarding the Corporation's compliance with the standards. ~~(→) The Superintendent shall assure that the Corporation's vendors and/or Food Service~~

~~Management Contractor is/are provided a copy of this policy and any implementing guidelines and that any pertinent agreements are consistent with this policy and any implementing guidelines. [END OF OPTION]~~

No food or beverage may be sold on any school premises except in accordance with the standards approved by the Board.

### **Competitive Food Sales**

The Food and Nutrition Services Department will comply with the provisions set forth in Federal law, incorporated in Indiana Code 20-26-9-18.5, regarding the sale of competitive food and foods of minimal nutritional value.

#### **[CHOOSE ONE (1) OF THE FOLLOWING TWO (2) OPTIONS]**

##### **~~[ ] OPTION 1~~**

~~Only the Food and Nutrition Services Department shall sell food and beverages to students in elementary schools during regular school hours.~~

~~In secondary schools, the Food and Nutrition Services Department shall be the sole provider of food and beverage items sold until [ ] thirty (30) minutes [ ] one (1) hour [ ] \_\_\_\_\_ [END OF OPTION] following the last lunch period, at which time other school organizations may begin to sell food and beverage items in accordance with the Board's wellness policy (Policy 8510) and guidelines (AG 8510) with Principal approval. Accordingly, all food and beverage items for sale to students for consumption on campus from vending machines, or school stores, or as fund-raisers by student clubs and organizations, parent groups, or boosters clubs shall comply with the current USDA Dietary Guidelines for Americans and the USDA Smart Snacks in Schools regulations and applicable State law and Florida Administrative Code rule, and shall be available only between thirty (30) minutes following the last school lunch period and thirty (30) minutes after the close of the regular school day.~~

##### **~~[END OF OPTION 1]~~**

##### **[OPTION 2]**

The Food and Nutrition Services Department shall be the sole provider of food and beverage items sold in all schools until ☒ thirty (30) minutes ~~[ ] one (1) hour [ ] \_\_\_\_\_ [END OF OPTION]~~ following the last lunch period, at which time other school organizations may begin to sell food and beverage items in accordance with the Board's wellness policy (Policy 8510) and guidelines (AG 8510) and with Principal approval. Accordingly, all food and beverage items for sale to students on campus from vending machines, or school stores, or as fund-raisers by student clubs and organizations, parent groups, or boosters clubs shall comply with the current USDA Dietary Guidelines for Americans and the USDA Smart Snacks in Schools regulations, and applicable State law and regulations, and shall be available only between thirty (30) minutes following the last school lunch period and thirty (30) minutes after the close of the regular school day.

##### **[END OF OPTION 2]**

##### **~~[END OF OPTIONS]~~**

~~[ ] Food and beverage items sold during the school day outside the cafeteria may be operated on a "profit share" program with prior approval of the Director of the Food and Nutrition Services Department and the principal.~~

### **Meal Charges**

Lunches sold by the Corporation may be purchased by students, staff members and community residents in accordance with the procedures established by the Superintendent.

A periodic review of the food-service accounts shall be made by the \_\_\_\_\_ **Business Manager and Treasurer**. Any surplus funds from the National School Lunch Program or the Healthy, Hunger-Free Kids Act of 2010 (P.L. 111-296) shall be used to reduce the cost of the service to students or to purchase cafeteria equipment. Surplus funds from a la carte foods may accrue to the food-service program.

Cafeteria purchases ~~( )~~ shall ☒ may **[END OF OPTION]** be prepaid into individual food service accounts ☒ before meal service begins ~~( )~~ or paid as they receive meals **[END OF OPTION]**. Prepayments into individual food service accounts may be made \_\_\_\_\_.

**[DRAFTING NOTE: Describe the process for prepaying into accounts, such as payments may be made anytime, weekly, monthly, for a set amount, online, etc.]**

The only deductions made from prepaid accounts will be for the purchase of meals or other allowable food purchases in the cafeteria.

If a student withdraws or graduates and has a positive balance of less than \$ 5.00, the balance may be receipted into the ( ☒ ) school lunch fund ( ) extra-curricular activity fund **[END OF OPTION]** where the school lunch program funds are maintained unless the parent requests a refund. If a student withdraws or graduates with a positive balance greater than \$ 5.00 **[DRAFTING NOTE: use the same amount as above]**, the ( ☒ ) parents ( ) student **[END OF OPTION]** shall be notified by mail and given the option of receiving a refund within 15 days. If no response is received within 15 days **[DRAFTING NOTE: Use the same number of days as stated in the notice.]**, the account will be closed and the funds will no longer be available. Unclaimed balances will be transferred to ( ☒ ) the school lunch fund ( ☒ ) the extra-curricular activity fund **[END OF OPTION]** where the school lunch program funds are maintained.

[ ☒ If a student repeatedly comes to school with no lunch and no money for lunch, the Food Service Manager shall notify the Principal, as this may be a sign of abuse or neglect and proper authorities may be contacted. **[END OF OPTION]**

### Bad Debt/Uncollectable Debt

Significant negative lunch account balances that are not collected in the year when the debt was incurred shall be classified as bad debt. Bad debt incurred through the inability to collect lunch payment from students is not an allowable cost chargeable to any Federal program.

Any related collection cost, including legal cost, arising from such bad debt after they have been determined to be uncollectable, are also unallowable. Any significant negative lunch account balance shall be pursued in accordance with Policy 6152 - Student Fees and Charges for collection before it is determined to be uncollectable to Policy 6151 - Bad Checks and Uncollectable Debts.

Once classified as bad debt, non-Federal funding sources shall reimburse the school lunch program account for the total amount of the bad debt. If funds to reimburse the Corporation for this bad debt are not available from another source, such as school or community organizations (like the PTA) or any other non-Federal source, the funds to reimburse the school lunch program shall be transferred from the Corporation operations fund or other State or local funding to make that reimbursement.

Once the uncollectable/delinquent debt charges are converted to bad debt, records relating to those charges must be maintained in accordance with the record retention requirements in 7 C.F.R. 210.9(b)(17) and 7 C.F.R. 210.15(b). Any related collection costs, including legal costs, arising from such bad debt after they have been determined to be uncollectable also are unallowable.

Any significant negative lunch account balance shall be pursued initially in accordance with Policy 6152 - Student Fees and Charges for collection before it is determined to be uncollectable pursuant to Policy 6151 - Bad Checks and Uncollectable Debts. Further, bad debt may be removed from accounts receivable in accordance with Policy 6151 - Bad Checks and Uncollectable dates.

### Negative Account Balances

**[DRAFTING NOTE: USDA regulations provide local control with respect to permitting negative lunch account balances, including prohibiting it altogether. As a practical matter, a hard-line rule prohibiting any negative account balances is not recommended. Rather, permitting some limited negative balances to occur, while placing some restrictions on those situations, is likely the most appropriate. Nonetheless, this first option recognizes that each Corporation does have the choice to prohibit a negative balance without any exceptions].**

Parents initially shall be notified via by text message? ParentSquare message **[DRAFTING NOTE: Enter method of first notification (e.g., phone call, email, letter, etc.).]** of a negative balance in their child's account ??weekly **[DRAFTING NOTE: Enter a time period, (e.g., upon every occurrence, every week, etc.).]** Negative balances are expected to be corrected upon the notification by Corporation personnel. The Director of Food Services **[DRAFTING NOTE: Enter staff assigned responsibility for initial notification.]** shall be responsible for making this initial notification to parents.

### [ ] OPTION 1

~~No student shall be permitted to purchase any meals for which the student does not have sufficient balance in their food service account or sufficient cash on hand to purchase the food items.~~

~~Students receiving paid or reduced-price lunch who do not have a sufficient account balance or cash on hand to purchase a meal ( ) will not be provided an alternative meal ( ) will be provided an alternative meal [END OF OPTION] that meets the USDA guidelines applicable to alternative meal options. The Superintendent shall, in coordination with the Corporation's~~

food service, assure that any alternative meals that are provided meet the requisite USDA guidelines for alternative meals. The cost of the alternative meal will be added to the delinquent account.

**[END OF OPTION 1]**

**☒ ] OPTION 2**

Students shall be permitted to purchase meals from the Corporation's food service using either cash on hand or a food service account. A student may be allowed to incur a negative food service account balance subject to the following conditions.

Students may be permitted to accumulate a negative food service account balance not to exceed ☒ ) \$ 20.00 (  ~~) an amount equal to one school week of regular meal price~~ **[END OF OPTIONS]**. ~~( ) Students up to grade 8 shall be allowed to incur a negative food service account balance not to exceed \$ \_\_\_\_\_.~~ **[END OF OPTIONAL SENTENCE]**  
**[DRAFTING NOTE: The Board may establish a different permissible negative balance for elementary grades to account for the students' lower level of responsibility for managing these accounts at the younger grade levels.]** A student ( ) shall be ☒ ) shall not be **[END OF OPTION]** permitted to purchase a la carte items without a sufficient food service account balance or cash on hand. ☒ ) Likewise, any student who has a negative food service account balance may not purchase a la carte items with cash unless the student also is able to bring their food service account current. **[END OF OPTION]**

☒ ] A student who has exceeded the permissible negative balance amount in their food service account and does not have cash on hand sufficient to purchase a meal will be treated respectfully. The Corporation shall provide meals to students with unpaid meal balances without stigmatizing them, shall provide parents of students who charge meals with notification when a student charges a meal, and shall make efforts to collect the charges incurred by the students so that the unpaid charges are not classified as bad debt at the end of the school year.

**☒ ] [Option A]**

If a student has reached the permissible level of negative food service account balance, they shall be provided a regular reimbursable meal that follows the USDA meal pattern, the cost of which shall continue to accrue to a negative food service account balance.

**[End of Option A]**

**~~[ ] [Option B]~~**

~~If a student has a significant negative food service account balance, they shall be provided an alternate meal ( ) at a reduced price recommended by the Superintendent and approved by the Board~~ **[END OF OPTION]**, the cost of which shall continue to accrue to a negative food service account balance, and the student's parent(s) shall be contacted to collect the outstanding charges. The alternate meal will be a low-cost alternative to the regular reimbursable meal and shall meet USDA nutritional standards or the Smart Snacks in Schools Regulations so that it qualifies for reimbursement under the National School Lunch/Breakfast Program.

**~~End of Option B]~~**

**[END OF OPTIONS]**

☒ ] Negative food service account balances will carry-over from year-to-year until paid in full or until a student enters ninth (9th) grade. Upon entering 9th grade, any negative food service account balances will be converted to school fees. Parents/Guardians shall be responsible for paying all fees in accordance with Policy 6152 - Student Fees and Charges.  
**[END OF OPTION]**

Students who have qualified for free lunches are still responsible for paying off any debt that was incurred prior to qualifying for free lunches.

**Modifications Based on Compliant Medical Documentation**

**[DRAFTING NOTE: The section below contains three (3) categories of circumstances in which a student may receive a modified meal. The first category, "Compliant Medical Documentation," is mandatory; whereas the second two (2) categories, i.e., "Noncompliant Medical Requests" and "Requests Not Based on a Medical Statement", are optional. The Board may choose either or neither of the two (2) optional categories.]**

An adult student or student's parent requesting special dietary accommodations for a student with a disability that restricts the diet must provide the Medical Statement for Special Dietary Needs signed by a State-authorized medical authority,

which is a medical professional authorized in the State of Indiana to write prescriptions. The request must contain the following information:

- A. an explanation of how the student's physical or mental impairment restricts the diet;
- B. the food(s)/type(s) of foods to be avoided;
- C. the food(s)/type(s) of foods to be substituted;
- D. additional pertinent information, if any, that will assist in accommodating the student's needs.

If a Medical Statement for Special Dietary Needs is incomplete, unclear, or lacks sufficient detail, the special dietary accommodation coordinator or food service director shall request that the student or parent/guardian, as applicable, request that the medical authority supplement the response so that a safe meal can be provided.

A special dietary accommodation for a student who has a disability that restricts the student's diet must be supported by a Medical Statement for Special Dietary Needs, which should be submitted to (X) the Food Service Director who shall serve as the Special Dietary Accommodation Coordinator ~~( ) the Special Dietary Accommodation Coordinator~~ **[END OF OPTIONS]. [Insert name, address, phone, email address.] [DRAFTING NOTE: at least one person must be identified as responsible for coordinating compliance with disability-based dietary modifications per 7 C.F.R. Part 15b.6.]**

A student with a disability may have an individualized education program (IEP) or Section 504 plan that requires specific instruction, services, or accommodations related to the student's nutritional needs. If a student's IEP or Section 504 plan contains the same information that is required on a Medical Statement for Special Dietary Needs, then it is not necessary to obtain and submit a separate Medical Statement for Special Dietary Needs.

The individual making an initial request for such substitutions must inform the Food Service Director or Special Dietary Accommodation Coordinator that the student has a disability that restricts the student's diet. The Corporation will honor the request upon receipt of the required documentation from a State-authorized medical authority. If the Special Dietary Accommodation Coordinator is unable to grant a requested accommodation following receipt of the medical authority's statement, the student or parent shall be provided with an explanation of the basis for the decision. Compliant requests shall be implemented immediately.

### Disability Accommodation Grievance Procedure

The following procedure is intended to provide prompt and equitable resolution to any concern or disagreement regarding the food service program's administration of meal modifications made or requested on the basis of a student's disability. None of the procedures described in this section shall prevent a student or parent from pursuing a complaint with any State or Federal agency, including the USDA, using the procedures described at the end of this policy or otherwise available under Indiana or Federal law.

- A. If an initial request for accommodation in the form of substituted meals is denied, the student or parent may request review of that decision by the (X) Principal ~~( ) Corporation's Compliance Coordinator ( ) Superintendent ( )~~ **[END OF OPTIONS] [DRAFTING NOTE: The grievance procedure can be designed as appropriate for each District.]** and shall provide any communications between the student or parent and food service officials concerning the accommodation request, any documentation provided by a medical authority, and any additional information the student or parent believes is pertinent to the decision. A review of the materials provided and of the initial decision shall be completed and a response provided to the student or parent as soon as practicable following receipt of the request for review. If the initial decision is reversed, including due to additional information provided on review, the dietary accommodations shall be implemented without delay. If the initial decision is affirmed ~~( ) the decision is final~~ (X) the decision may be appealed to the Superintendent, whose decision is final ~~( )~~ **[END OF OPTIONS].**
- B. Any other complaint or disagreement with the food service administration concerning the implementation of special dietary accommodations based on a student's disability shall be presented to the Special Dietary Accommodation Coordinator. The student or parent shall specify the nature of the concern and any requested remedy in writing. The Coordinator shall promptly review the grievance and either contact the student or parent for any required clarification of the request or to seek to reach an agreement regarding how to best address the concern. If no agreement is reached, the Coordinator shall make a determination and notify the student or parent in writing as soon as practicable. If the grievance is affirmed in any respect, the Coordinator shall propose a plan for implementing appropriate remedial measures. If the student or parent is dissatisfied with the Coordinator's determination, the student or parent may submit a written request to the Building Principal or Superintendent for review. The Superintendent's determination shall be final.



**[Optional Provision - for medical statements not compliant with 7 C.F.R. Part 15b]**

**[ ☒ Modifications Based on Noncompliant Medical Requests**

On a case-by-case basis, substitutions to the standard meal requirements may be made, at no additional charge, for students who provide a signed statement from a qualified medical authority that the student cannot consume certain food items due to medical or other special dietary needs, but which does not comply with the requirements above. To qualify for such consideration and substitutions, the medical statement must identify:

- A. the medical or dietary need that restricts the student's diet; and
- B. the food(s) to be omitted from the student's diet and the food(s) or choice of foods that may be substituted.

**~~[END OF OPTION]~~**

**~~[Optional Provision, Based on preferences with no medical documentation] [DRAFTING NOTE: If the Board chooses to include this category of modification, it must also choose among the options below.]~~**

**~~[ ] Modification Based on Student/Parental Preference~~**

~~When a request for a special dietary accommodation is not supported by an authorized Medical Statement for Special Dietary Needs or included in a student's IEP or 504 plan, the Corporation cannot provide modified meals that are not in compliance with USDA Child Nutrition Program requirements. However, the Board authorizes the following:~~

**A. ~~[ ] Fluid Milk Substitution [If Selected, Choose ONE]~~**

~~[ ] The Corporation shall have no legal obligation to accommodate a student's or a parent's preference for a fluid milk substitute if there is no Medical Statement for Special Dietary Needs on file requiring such a substitute. However, the Corporation shall assist the student in choosing a reimbursable meal through offer versus serve (OVS).~~

~~[ ] The Corporation shall offer a Federally approved milk substitute with a written and signed request from a parent that identifies the reason for the special dietary accommodation.~~

**B. ~~[ ] Religious Reason [If Selected, Choose ONE]~~**

~~[ ] The Corporation shall have no legal obligation to accommodate a student's or parent's request for accommodations based on religious requests. However, the Corporation shall assist the student in choosing a reimbursable meal through offer versus serve (OVS).~~

~~[ ] The Corporation shall provide substitutions based on religious requests to any student, for any religious reason, with a written and signed request by a parent that identifies the reason for the accommodation. A substitution for a religious request must meet USDA Child Nutrition Program meal pattern requirements.~~

**C. ~~[ ] General Dietary Preference [If Selected, Choose ONE]~~**

~~[ ] The Corporation shall have no legal obligation to accommodate a student's or parent's general health, nutrition, or food preferences. However, the Corporation shall assist the student in choosing a reimbursable meal through offer versus serve (OVS).~~

~~[ ] The School District will provide substitutions based on lifestyle preferences to any student with a written and signed request by a parent that identifies the reason for the accommodation. A substitution for a personal request must meet USDA Child Nutrition Program meal pattern requirements.~~

**~~[END OF OPTIONS]~~**

**Review**

Upon receipt of a request for a special dietary accommodation, the Food Service Director or Special Dietary Accommodation Coordinator shall review the request to ensure it is supported as required by Federal law and Board policy, and if not, shall request additional or clarifying information from the student or parent making the request.

**Implementation**

When the need for a special dietary accommodation is supported by a Medical Statement for Special Dietary Needs signed by a State-authorized medical authority, the Corporation shall offer a reasonable modification that effectively



accommodates the student's disability. Following USDA Child Nutrition Program regulations, the Corporation may consider factors such as cost and efficiency, and is not required to prepare a specific meal, provide a specific brand of food, or provide a meal beyond the meals provided to other students.

For students who have an IEP or Section 504 plan that requires specific food-related accommodations, the Corporation shall provide the accommodation as required by law, seeking clarifying medical information, as necessary.

A special dietary request shall be approved and implemented upon submission of a completed authorized Medical Statement.

### **Student Absence**

If a student receiving a special dietary accommodation is absent or does not wish to participate in school lunch on a day an accommodation is planned, the student or parent shall contact the Special Dietary Accommodation Coordinator by 9:00 a.m. \_\_\_\_\_ ~~[enter a time in not 9:00 a.m.]~~ the same day.

### **Renewing A Special Dietary Request**

An authorized Medical Statement does not need to be updated annually. However, the Special Dietary Accommodation Coordinator may seek clarification or updates on special dietary requests annually.

### **Discontinuation of a Special Dietary Request**

A special dietary request or part of a request may be discontinued by a parent by submitting the request in writing to the Special Dietary Accommodation Coordinator, or shall be discontinued consistent with the medical authorities' recommendation provided with the Medical Statement for Special Dietary Needs.

### **Emergency First Aid**

In each school cafeteria, there shall be a poster that is easily visible and prominently placed that contains step-by-step instructions on how to provide emergency first aid for choking on conscious individuals. During all times while the food service program is operating and students are being served food, at least one (1) employee shall be present in the area in which the food is being consumed who has received instruction in methods to prevent choking and demonstrated an ability to perform the Heimlich maneuver.

### **Food Safety Compliance**

In accordance with Federal law, the \_\_\_\_\_ **Director of Food Services** shall take such actions as are necessary to obtain a minimum of two (2) food safety inspections per school year, which are conducted by the State or local governmental agency responsible for food safety inspections. The report of the most recent inspection shall be posted in a publicly visible location, and a copy of the report shall be available upon request. **[Please note: schools participating in more than one (1) child nutrition program are required to obtain only two (2) food safety inspections per school year if the nutrition programs offered use the same facilities for the preparation and service of meals. Also, the requirement for two (2) inspections does not apply to schools that offer only the Special Milk Program.]**

### **Operation of the Food Service Program**

With regard to the operation of the Corporation Food Service program, the Superintendent shall require:

- A. maintenance of sanitary, neat premises free from fire and health hazards;
- B. preparation of food that complies with Federal food safety regulations;
- C. planning and execution of menus in compliance with USDA requirements;
- D. purchase of food and supplies in accordance with State and Federal law, USDA regulations, and Board policy; (see Policy 1130 - Conflict of Interest, Policy 1214 - Staff Gifts, Policy 3113 - Conflict of Interest, Policy 3214 - Staff Gifts, Policy 4113 - Conflict of Interest, Policy 4214 - Staff Gifts, and Policy 6460- Vendor Relations);
- E. compliance with food holds and recalls in accordance with USDA regulations;
- F. accounting and disposition of food-service funds pursuant to Federal and State law and USDA regulations;
- G. safekeeping and storage of food and food equipment pursuant to State and Federal law and USDA regulations;

H. regular maintenance and replacement of equipment;

I. compliance with the Corporation's time and effort record-keeping policy by all Corporation employees whose salaries are paid from USDA funds or with non-Federal funds used to meet a match or cost share requirement. (See Policy 6116 - Time and Effort Reporting)

The Corporation's Food Service program will serve only food items and beverages as determined by the Food Service Department to be in compliance with the current USDA Dietary Guidelines for Americans. Any competitive food items and beverages that are available for sale to students à la carte in the dining area between midnight and thirty (30) minutes following the end of the last lunch period also shall comply with the current USDA *Nutrition Standards for the National School Lunch and School Breakfast Programs* and the USDA *Smart Snacks in Schools* regulations. Foods and beverages unassociated with the food-service program may be vended subject to the rules and regulations set forth in Policy 8540.

The Superintendent shall require that the Food Service program serve foods in the schools of the Corporation that are wholesome and nutritious and reinforce the concepts taught in the classroom.

### **Vending Machines**

The Board recognizes that vending machines can produce revenues that are useful to augment programs and services for students and staff. It shall, therefore, authorize their use in Corporation facilities, provided that the following conditions are satisfied:

- A. ~~( ) all contracts, relative to the installation, servicing, stocking, and maintenance of the vending machines, must be approved by the Board;~~
- B. (X) the location of the vending machines within a facility or at other places on Corporation property may be selected by the administrator in charge of the facility or area of Corporation property, subject to the approval of the Superintendent;
- C. ~~( ) no money will remain in vending machines overnight;~~
- D. (X) all monies collected from vending machines will be deposited with the school Treasurer in accordance with the current guidelines established by the State Board of Accounts in its Handbook of Instruction for extra-curricular accounts;
- E. (X) the installation, servicing, stocking, and maintenance of each machine is contracted for with a reputable supplier of vending machines and their products;
- F. (X) no products are vended that would conflict with or contradict information or procedures contained in the Corporation's educational programs on health and nutrition;
- G. (X) no food or beverages are to be sold or distributed, which will compete with the Corporation's food-service program;
- H. (X) food and beverage items (X) available for sale to students [END OF OPTION] in vending machines for consumption on campus shall comply with the current USDA Dietary Guidelines for Americans and the USDA Smart Snacks in Schools regulations and applicable State law.

In accordance with the nutritional standards adopted by the Board, the placement of vending machines in any classroom where students are provided instruction is prohibited unless the classroom also is used to serve meals to students.

The profits from the sale of items in a vending machine will be credited in the following manner:

- A. (X) profit from vending machines available to students will be used for the benefit of the students;
- B. (X) profit from vending machines not available to students may be used for the benefit of school, Corporation, or staff needs;
- C. (X) profit from vending machines sponsored by an authorized student organization may be used to benefit the sponsoring organization, if approved by the Superintendent.

### **Nondiscrimination Statement**

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies,

this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender status, sexual orientation, or gender identity), disability (including HIV, AIDS, or sickle cell trait), pregnancy, age (except as authorized by law), religion, military status, ancestry, or genetic information (collectively, "protected classes") or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotope, American Sign Language), should contact the responsible State or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form, which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf> or <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sfa-civil-rights-complaints-procedure-template.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. Fax: (833)256-1665 or (202) 690-7442; or
3. E-mail: [program.intake@usda.gov](mailto:program.intake@usda.gov).

This institution is an equal opportunity provider.

All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the Corporation must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within three (3) days.

The above nondiscrimination statement complements the Corporation's nondiscrimination policies, including Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity and Policy 1422/Policy 3122/Policy 4122—Nondiscrimination and Equal Employment Opportunity.

### **Policy Distribution**

This policy shall be distributed in writing to all households at the start of each school year and to households transferring to the school or Corporation during the school year. The policy will also be provided to all Corporation staff with responsibility for enforcing the policies.

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Legal	I.C. 20-26-9-18
	I.C. 20-26-9-18.5
	I.C. 25-14.5-4
	Healthy, Hunger-Free Kids Act of 2010 and Richard B. Russell National School Lunch Act, 42 U.S.C. 1751 et seq.
	Child Nutrition Act of 1966, 42 U.S.C. 1771 et seq.
	7 CFR Parts 15b, 210, 215, 220, 225, 226, 227, 235, 240, 245, 3015
	2 C.F.R. Part 200
	USDA Smart Snacks in School Food Guidelines (effective July 1, 2014)
	SP 32-2015 Statements Supporting Accommodations for Children with Disabilities in the Child Nutrition Programs
	Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. 794
	34 CFR Part 104
	Uniform Compliance Guidelines for Indiana Public School Corporation (Indiana State

Board of Accounts)



Book	Policy Manual
Section	Policies for Board 37-2
Title	Copy of WELLNESS
Code	po8510
Status	Work Session
Adopted	May 20, 2010
Last Revised	March 2, 2023

#### 8510 - **WELLNESS**

As required by law, the Board establishes the following wellness policy for the Corporation as a part of a comprehensive wellness initiative.

The Board recognizes that good nutrition and regular physical activity affect the health and well-being of the Corporation's students. Furthermore, research suggests that there is a positive correlation between a student's health and well-being and his/her ability to learn. Moreover, schools can play an important role in the developmental process by which students establish their health and nutrition habits by providing nutritious meals and snacks through the schools' meal programs, by supporting the development of good eating habits, and by promoting increased physical activity both in and out of school.

Schools alone, however, cannot develop in students healthy behaviors and habits with regard to eating and exercise. It will be necessary for not only the staff but also parents and the public at large to be involved in a community-wide effort to promote, support, and model such healthy behaviors and habits **with respect to eating and exercise**.

The Board sets the following goals in an effort to enable students to establish good health, ~~and nutrition habits:~~ **healthy nutrition, and physical activity habits:**

##### A. With regard to nutrition education:

1. Nutrition education shall be included in the sequential, comprehensive health curriculum in accordance with the curriculum standards and benchmarks established by the State.
2. Nutrition education may include enjoyable, developmentally appropriate and culturally relevant participatory activities, such as contests, promotions, taste testing, and others.
3. Nutrition education shall include opportunities for appropriate student projects related to nutrition, involving, when possible, community agencies and organizations.
4. Nutrition education shall extend beyond the classroom by engaging and involving the school's food service staff.
5. Nutrition education posters, such as the ~~MyPlate Guide, will be displayed.~~ **Food Pyramid Guide and USDA's MyPlate, will be displayed in the cafeteria and other appropriate areas visible to students and others in the school community.**
6. The school cafeteria shall serve as a learning lab by allowing students to apply the knowledge, attitudes, and skills taught in the classroom when making choices at mealtime.
7. Nutrition education shall extend beyond the school by engaging and involving families and the community.

8. Nutrition education shall reinforce lifelong balance by emphasizing the link between caloric intake (eating) and exercise in ways that are age-appropriate **and enjoyable**.
9. Instruction related to the standards and benchmarks for nutrition education shall be provided by highly qualified teachers.
10. The Corporation shall provide information to parents that is designed to encourage them to reinforce at home the standards and benchmarks being taught in the classroom.

B. With regard to physical activity:

**1. Physical Education**

- a. A sequential, comprehensive recreation and physical education program shall be provided for students in K- 12 in accordance with the physical education academic content standards and benchmarks adopted by the State.
- b. The sequential, comprehensive physical education curriculum shall provide students with opportunities to learn, practice, and be assessed on developmentally appropriate knowledge, attitudes, and skills necessary to engage in lifelong, health-enhancing physical activity.
- c. Planned instruction in physical education shall be sufficient for students to achieve a proficient level with regard to the standards and benchmarks adopted by the State.
- d. Planned instruction in physical education shall promote participation in physical activity outside the regular school day.
- e. The physical education curriculum shall provide sequential instruction related to the knowledge, attitudes, and skills necessary to participate in lifelong, health-enhancing physical activity.
- f. Physical education classes shall provide students with opportunities to learn, practice, and be assessed on developmentally appropriate knowledge, attitudes, and skills necessary to engage in lifelong, health-enhancing physical activity.
- g. The sequential, comprehensive physical education curriculum shall stress the importance of remaining physically active for life.
- h. Planned instruction in physical education shall teach cooperation, fair play, and responsible participation.
- i. Planned instruction in physical education shall meet the needs of all students, including those who are not athletically gifted.
- j. Planned instruction in physical education shall be presented in an environment free of embarrassment, humiliation, shaming, taunting, bullying, or harassment of any kind.
- k. Planned instruction in physical education shall include cooperative as well as competitive games.
- l. Planned instruction in physical education shall take into account gender and cultural differences.

**2. Physical Activity**

- a. Physical activity and movement shall be integrated, when possible, across the curricula and throughout the school day (e.g., classroom physical activity breaks).
- b. Schools shall encourage families to provide physical activity outside the regular school day, such as outdoor play at home, participation in sports sponsored by community agencies or organizations, and in lifelong physical activities like bowling, swimming, or tennis.
- c. The school may provide information to families to encourage and assist them in their efforts to incorporate physical activity into their children's daily lives.
- d. The school may encourage families and community organizations to help develop and institute programs that support physical activity of all sorts.

- e. Students may have the opportunity to participate in extracurricular activities and intramural programs that emphasize physical activity.
- f. All students in grades 6-12 shall have the opportunity to participate in interscholastic sports programs.

C. With regard to other school-based activities:

1. Free drinking water shall be available to students during designated meal times and may be available throughout the school day.
2. The schools shall schedule mealtimes so there is minimum disruption by bus schedules, recess, and other special programs or events.
3. The school shall provide attractive, clean environments in which the students eat.
4. Activities, such as tutoring or club meetings, shall not be scheduled during mealtimes, unless students may eat during those meetings.
5. An organized wellness program shall be available to all staff.
6. The schools may demonstrate support for the health of all students by hosting health clinics and screenings and encouraging parents to enroll their eligible children in Medicaid or in other children's health insurance programs for which they may qualify.
7. Schools in our system utilize electronic identification and payment systems, therefore, eliminating any stigma or identification of students eligible to receive free and/or reduced meals.
8. Students are discouraged from sharing their foods or beverages with one another during meal times, given concerns about allergies and other restrictions on some students' diets.
9. ~~(-) Schools provide students affordable access to the varied and nutritious foods they need to be healthy and to learn well regardless of unpaid meal balances.~~

- D. With regard to nutrition promotion, any foods and beverages marketed or promoted to students on the school campus, during the school day, will meet or exceed the USDA Smart Snacks in School nutrition standards. This includes marketing on school property, on educational materials, where food is purchased, in school publications and school media, and through fundraisers.

Additionally, the corporation shall:

1. encourage students to increase their consumption of healthful foods during the school day;
2. create an environment that reinforces the development of healthy eating habits and provides opportunities for students to develop the knowledge and skills for consuming healthful foods.

Furthermore, with the objectives of enhancing student health and well-being, and reducing childhood obesity, the following guidelines are established:

- A. In accordance with Policy 8500, entitled Food Service, the food service program shall comply with Federal and State regulations pertaining to the selection, preparation, consumption, and disposal of food and beverages as well as to the fiscal management of the program.
- B. The sale of foods of minimal nutritional value in the food service area during the lunch period is prohibited.
- C. As set forth in Policy 8531, entitled Free and Reduced Price Meals, the guidelines for reimbursable school meals are not less restrictive than the guidelines issued by the U.S. Department of Agriculture (USDA).
- D. The sale to students of foods and beverages that do not meet the USDA Dietary Guidelines for Americans and the USDA Smart Snacks in School nutrition standards to be consumed on the school campus during the school day is prohibited. Competitive foods available for purchase by students à la carte in the dining area, foods or beverages sold from vending machines, and foods and beverages provided by the school or school staff for classroom parties or holiday celebrations are subject to this prohibition.



- E. All foods that are provided, not sold, on the school campus during the school day, including foods and beverages provided for classroom parties or holiday celebrations shall comply with the food and beverage standards approved by the Superintendent.
- F. The food service program will strive to be financially self-supporting; however, if it is necessary to subsidize the operation, it will not be through the sale of foods with minimal nutritious value.
- G. The school food service program may involve students, parents, staff, and school officials in the selection of competitive food items to be sold in the schools.
- H. The food service program will provide information to families about free/reduced meal eligibility
- I. All food items and beverages available for sale to students for consumption on campus between 12:01 am and thirty (30) minutes after the close of the regular school day shall comply with the current USDA's Dietary Guidelines for Americans and the USDA's Smart Snacks in Schools regulations, including, but not limited to, competitive foods that are available to students à la carte in the dining area, as well as food items and beverages from vending machines, school stores, or fund-raisers by student clubs and organizations, parent groups, or boosters clubs.
- J. All foods available to students in Corporation programs, other than the food service program, shall be served with consideration for promoting student health and well-being.
- K. The food service program shall be administered by a director who is properly qualified, certificated, licensed, or credentialed, according to current professional standards.
- L. All food service personnel shall receive pre-service training in food service operations.
- M. Continuing professional development shall be provided for all staff of the food service program in accordance with USDA professional standards.

The Board designates the Superintendent or designee as the individual charged with operational responsibility for measuring and evaluating the Corporation's implementation and progress under this policy.

The Superintendent shall appoint the Corporation wellness committee that includes parents, students, representatives of the school food authority, nutritionists or certified dietitians, educational staff (including health and physical education teachers), mental health and social services staff, school health professionals, the School Board, school administrators, and members of the public to oversee the development, implementation, evaluation, and periodic update, if necessary, of the wellness policy. School level health advisory teams may assist in the planning and implementation of these Wellness initiatives.

The wellness committee shall be an ad hoc committee of the Board with members recruited and appointed annually.

The wellness committee shall:

- A. assess the current environment in each of the Corporation's schools
- B. measure the implementation of the Corporation's wellness policy in each of the Corporation's schools
- C. review the Corporation's current wellness policy
- D. recommend revision of the policy, as appropriate and
- E. present the wellness policy, with any recommended revisions, to the Board for approval or re-adoption if revisions are recommended.

Before the end of each school year the wellness committee shall submit to the Superintendent and Board their report in which they describe the environment in each of the Corporation's schools and the implementation of the wellness policy in each school, and identify any revisions to the policy the committee deems necessary. In its review, the Wellness Committee shall consider evidence-based strategies in determining its recommendations.

The Corporation shall assess the Wellness Policy at least once every three (3) years on the extent to which schools in the Corporation are in compliance with the Corporation policy, the extent to which the Corporation policy compares to model wellness policies, and the progress made in attaining the goals of the Corporation Wellness Policy. To ensure continuing progress, the Corporation will evaluate implementation efforts and their impact on students and staff using the following tool: <https://schools.healthiergeneration.org/>

The assessment shall be made available to the public on the School Corporation's website.

Food and beverage marketing that allow marketing and advertising on only those foods and beverages that meet the Smart Snacks in School nutrition standards.

### **Nondiscrimination Statement**

In accordance with Federal civil rights law and USDA civil rights regulations and policies, the USDA, its agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible State or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. Mail:  
U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. Fax:  
(833) 256-1665 or (202) 690-7442; or
3. E-mail:  
[program.intake@usda.gov](mailto:program.intake@usda.gov)

This institution is an equal opportunity provider.

The above nondiscrimination statement complements the Corporation's nondiscrimination policies, including Policy 2260 - Nondiscrimination and Access to Equal Educational Opportunity and Policy 1422/Policy 3122/Policy 4122 - Nondiscrimination and Equal Employment Opportunity.

Revised 3/20/14  
Revised 8/7/14  
Revised 2/5/15  
Revised 2/2/17  
Revised 8/3/17  
Revised 7/15/21

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Legal	I.C. 20-26-9-18
	42 U.S.C. 1751 et seq.
	42 U.S.C. 1758b
	42 U.S.C. 1771 et seq.
	7 C.F.R. Parts 210 and 220



Book	Policy Manual
Section	Volume 37, No. 2 - April 2025
Title	Copy of VENDING MACHINES
Code	po8540
Status	Work Session
Adopted	May 20, 2010
Last Revised	February 2, 2017

#### 8540 - **VENDING MACHINES**

##### **RESCIND POLICY**

The School Board recognizes that vending machines can produce revenues that are useful to augment programs and services to students and staff. It will, therefore, authorize their use in Corporation facilities provided that the following conditions are satisfied:

- A. The installation, servicing, stocking, and maintenance of each machine is contracted for with a reputable supplier of vending machines and their products.
- B. The Corporation's share of the revenues is managed by the Treasurer in accordance with relevant Board policies and administrative guidelines.
- C. No products are vended between 12:00 am midnight and thirty (30) minutes following the end of the school day that would conflict with or contradict information or procedures contained in the Corporation's educational programs on health and nutrition or with Policy 8510 - Wellness.
- D. Food items and beverages available for sale to students in vending machines for consumption on campus between 12:00 am midnight and thirty (30) minutes following the end of the school day shall comply with the current USDA's Dietary Guidelines for Americans and Smart Snacks for Schools regulations.

The Superintendent shall develop and implement administrative guidelines that require that these conditions are adhered to on a continuing basis and that the proper procedures are established regarding location, operation, and maintenance of the equipment as well as for the dispensing of products.

Revised 8/7/14  
Revised 2/5/15

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Legal	42 U.S.C. 1779 7 C.F.R. 210.11(a)(5)
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