Food Program
One Bright Ray, Inc.
1142 E. Erie Ave.
Philadelphia, PA, 19124

OFFER VERSUS SERVE (OVS) AND INCOMPLETE MEALS POLICY

Internal Controls and Financial Procedures

Policy Statement

The school participates in the United States Department of Agriculture (USDA) National School Lunch Program (NSLP) and National School Breakfast Program (SBP). The school follows applicable USDA meal pattern requirements to ensure that meals served meet federal nutritional standards and qualify for reimbursement.

The school implements Offer Versus Serve (OVS), where applicable, to allow students to select the food items they intend to consume while ensuring that meals meet the requirements for reimbursement.

1. Offer Versus Serve Requirements

Offer Versus Serve allows students to decline certain food components or items while still receiving a reimbursable meal.

Breakfast Requirements:

- Students must be offered at least four food items from the required meal components.
- Students may decline one food item.
- Students must select at least three food items, including at least ½ cup of fruit.

Lunch Requirements:

- Students must be offered all five required meal components: fruit, vegetables, grains, meat/meat alternate, and milk.
- Students may decline up to two components.

- Students must select at least three of the five components.
- Students must select at least ½ cup of fruit or vegetables.

All selected items must meet the applicable USDA minimum portion requirements.

2. Incomplete Meals – Non-Reimbursable Meals

A meal that does not meet the USDA requirements for a reimbursable breakfast or lunch is considered an incomplete meal and cannot be claimed for federal reimbursement.

Examples include:

- A breakfast containing fewer than three required food items.
- A breakfast that does not include at least ½ cup of fruit.
- A lunch containing fewer than three of the five required meal components.
- A lunch that does not include at least ½ cup of fruit or vegetables.
- A meal that does not meet the applicable USDA minimum portion requirements.

3. Point-of-Service Meal Identification

Food service personnel are responsible for identifying reimbursable meals at the point of service before the student leaves the serving line.

Staff must:

- Review the student's selected food items.
- Confirm that the meal meets USDA reimbursable meal requirements.
- Politely inform students when their selections do not constitute a complete reimbursable meal.
- Encourage students to select the missing food item or component when necessary.
- Ensure that incomplete meals are not counted as reimbursable meals.

4. Handling Incomplete Meals

When a student selects an incomplete meal, food service personnel will respectfully explain which additional food item is needed to meet the USDA meal requirements.

Students will be given the opportunity to select the missing item to complete their meal.

If the student declines to select the additional item, the meal will be documented as non-reimbursable and excluded from the reimbursable meal count.

Because the school participates in the Community Eligibility Provision (CEP), students will not be charged for incomplete meals. No payment will be requested from parents or guardians, and no student meal debt will be established.

5. Internal Controls and Recordkeeping

To maintain compliance with USDA requirements, the school will implement the following internal controls:

- Food service personnel will receive training on Offer Versus Serve requirements and reimbursable meal identification.
- Daily meal counts will be recorded at the point of service.
- Reimbursable and non-reimbursable meals will be properly identified and documented.
- Incomplete meals will not be included in federal reimbursement claims.
- The designated food service supervisor or administrator will periodically monitor meal service procedures.
- Menu production records and daily meal count documentation will be maintained in accordance with USDA and state agency requirements.

6. Staff Training and Accountability

All employees responsible for meal preparation, meal service, point-of-service, and meal counting must understand and follow this policy.

The school administration and designated food service personnel are responsible for monitoring compliance, providing ongoing training, and correcting any deficiencies identified during internal reviews.

7. Policy Compliance

The school will follow all applicable USDA regulations and state agency guidance governing meal patterns, Offer Versus Serve, point-of-service meal identification, and federal reimbursement.

This policy is intended to ensure that students receive nutritious meals, that meal counts are accurate, and that the school maintains proper internal controls to protect the integrity of the National School Breakfast and National School Lunch Programs.

Effective Date: 08/24/2026

Approved By: Frances Velazquez

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