This informational chart outlines the differences and similarities operating the National School Lunch/Breakfast Programs (NSLP/SBP) with or without the Healthy School Meals for All Program (HSMA). Sponsors opting into HSMA may have all Community Eligibility Provision (CEP) schools, no CEP schools or a combination of CEP and non-CEP schools.

	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
Allowable Meals	Breakfast and Lunch Option to serve both or just one	Breakfast and Lunch Option to serve both or just one	Must serve breakfast and lunch at each school participating in CEP
Sponsor Organization Eligibility	Approved Colorado public or private/non-public school district, charter school food authority or Residential Child Care Institution that participates in NSLP or SBP. Online schools and students not attending participating NSLP/SBP schools do not qualify for meals.	Approved Colorado public school district, charter school food authority, day treatment facility, or Residential Child Care Institution that participates in the NSLP or SBP. Online schools and students not attending participating NSLP/SBP schools do not qualify for meals.	Approved Colorado public school district, charter school food authority, day treatment facility, or Residential Child Care Institution that participates in the NSLP **and** SBP. Online schools and students not attending participating NSLP/SBP schools do not qualify for meals.
Household Income Applications	Must collect and process household income applications as part of normal operations. Must follow disclosure requirements, complete verification and direct certification. May use a student's eligibility status from the prior school year for the first 30 days of the new school year (i.e., carryover).	Must collect and process household income applications as part of normal operations. A sponsor with CEP schools and non-CEP schools may collect a combo form at all sites. Must follow disclosure requirements, complete verification and direct certification. May use a student's eligibility status from the prior school year for the	Applications are no longer collected for the purpose of establishing eligibility, but income applications (combo form) may be collected for other non-nutrition purposes. Processing of this form must be paid using non-nutrition funds. A sponsor with CEP schools and non-CEP schools may collect a combo form at all sites. Must follow disclosure requirements

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
		first 30 days of the new school year (i.e., carryover).	and complete direct certification. Verification is only required when a combo form is used to establish school meal eligibility at non-CEP sites.
Federal Reimbursement Rates	Federal reimbursement rates are updated by USDA each July. Sponsors will receive federal reimbursement based on the number of free, reduce-priced and paid meals claimed.	Federal reimbursement rates are updated by USDA each July. Sponsors will receive federal reimbursement based on the number of free, reduced-priced and paid meals claimed. In addition, sponsors will receive state reimbursement for the number of paid meals claimed (the difference between the federal paid and free rates).	Federal reimbursement rates are updated by USDA each July. Sponsors will receive federal reimbursement based on the Free Claiming Percentage established based on a sites Identified Student Percentage (ISP). In addition, sponsors will receive state reimbursement for the number of paid meals claimed (the difference between the federal paid and free rates).
Colorado Start Smart & Lunch Protection Reimbursement	Sponsors will receive state reimbursement for the reduced co-pay for all reduced-price meals claimed.	Sponsors will receive state reimbursement for the reduced co-pay for all reduced-price meals claimed.	Not applicable. CEP schools do not have a reduced category for claiming, only a percentage of free meals and paid meals.

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
Breakfast After the Bell Nutrition Program	Public schools with 70% or more students eligible for free or reduced-price lunch are mandated to offer all students a breakfast at no cost after the tardy bell. Exceptions apply for school districts with less than 1,000 students. *Note: A district may use any breakfast service model (i.e., breakfast in the classroom) as long as breakfast is made available after the tardy bell. Service model(s) must be included in your renewal application.*		
Meal Counting	Count reimbursable meals by individual student and their eligibility.	Count reimbursable meals by individual student and their eligibility.	Count total number of reimbursable student meals ensuring one meal per student; there is no need to count by student eligibility category.
Meal Claiming	Claim meals by student eligibility (free, reduced-price or paid) in the Colorado Nutrition Portal.	Claim meals by student eligibility (free, reduced-price or paid) in the Colorado Nutrition Portal.	Claim the total number of meals served each day (may use a tally sheet or point of sale) in the Colorado Nutrition Portal. The Colorado Nutrition Portal will automatically claim meals on predetermined Free Claiming Percentages (FCP) set during the CEP cycle. Participation in CEP does not change the requirement to conduct claim edit checks.

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
Paid Lunch Equity (PLE) Tool	Schools that charge paid students for meals are required to assess their student paid prices annually. If a sponsor has a negative fund balance, they must complete the PLE tool and increase the price of paid lunches based on tool outcome, if applicable.	HSMA districts (i.e., have non-pricing schools) are exempt from completing the PLE tool.	HSMA districts (i.e., have non-pricing schools) are exempt from completing the PLE tool.
Nonprogram Revenue (NPR)	School food authorities are required to determine if the revenue from nonprogram foods (a la carte, second meals, adult meals, catering, etc.) generates at least the same proportion of revenue as they contribute to the SFA's food cost.		
Unpaid Meal Charges	Sponsors must have an unpaid meal charge policy in place and must communicate the policy to all families.	Sponsors must follow their unpaid meal charge policy for balances accrued prior to opting into HSMA. The food service fund cannot absorb unpaid meal charges and must follow the district policy if writing off bad debt. Once opted into HSMA, unpaid meal charges will no longer accrue. It is not recommended to allow students to charge for a la carte items. Sponsors are not required to have an unpaid meal charge policy under HSMA.	Sponsors must follow their unpaid meal charge policy for balances accrued prior to opting into HSMA. The food service fund cannot absorb unpaid meal charges and must follow their district policy if writing off bad debt. Once opted into HSMA, unpaid meal charges will no longer accrue. It is not recommended to allow students to charge for a la carte items. Sponsors are not required to have an unpaid meal charge policy under HSMA.

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
Excess Net Cash	If the nonprofit food service account has net cash resources exceeding more than six months average expenditures, a spending plan of how the excess funds are being invested back into the school meal programs must be submitted to CDE for approval		
Meal Patterns	Sponsors must follow SBP and NSLP meal patterns and must plan all menus to meet the grade group requirements for the grade groups served at each site Offer vs serve is required for lunch at the high school level, optional at lower levels and at breakfast The pre-K meal pattern must be followed for pre-K students when they eat meals separately from older students		
Special Dietary Needs	Sponsors are required to accommodate special dietary needs when due to a disability and supported with a medical statement. Such accommodations may fall outside of the meal pattern requirements and those meals may still be claimed for reimbursement. Sponsors may choose to make accommodations for dietary preferences, but all accommodations must meet meal pattern requirements in order for the meal to be claimed for reimbursement.	Same	Same In addition, sponsors using tally sheets in place of an electronic point of service are encouraged to develop methods to alert staff of students with special dietary needs in the serving line.

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
	All sponsors must inform households of their ability to provide reasonable meal accommodations for students with disabilities.		
Smart Snacks, Competitive Foods & Healthy Beverage Policy	All foods sold on school property during the school day are required to meet Smart Snacks standards and the Colorado Healthy Beverage and Competitive Food Policies. This includes school stores, outside vending machines, etc.		
Meal Service Times	Meals must be served during a specific time frame and ensure no overlap of meal service. Breakfast must be served before 10 am and lunch between 10 am-2 pm, unless an approved waiver is on file with CDE.		
Meal Service Location	Meals must be served to students enrolled in a participating school and consumed on-site. To increase student access to meals, meals may be served in the cafeteria, classroom, or elsewhere (i.e. district run food trucks) on the school campus.		
Annual Program Application	Sponsors apply to operate school nutrition programs through the Child Nutrition Portal. Sponsors will apply annually before the start of the school year and submit site applications.	Sponsors apply to operate school nutrition programs through the Child Nutrition Portal. Sponsors will apply annually before the start of the school year and submit site applications. Sponsors will indicate their participation in the HSMA program in the application.	Sponsors apply to operate school nutrition programs through the Child Nutrition Portal. Sponsors will apply annually before the start of the school year and submit site applications. Sponsors will indicate their participation in the HSMA program in the application.

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
			CEP Schools will complete validation to establish free claiming percentages at the start of their four year cycle.
Civil Rights	School nutrition staff must complete annual training and follow all civil rights regulations to ensure all eligible persons receive program benefits in a non-discriminatory manner consistent with FNS Instruction 113-1.		
On-Site Monitoring	The on-site monitoring form must be completed by February 1st of each school year for sponsors with more than one site.		
Food Safety	Sponsors must request two food safety inspections from their local health department each year and implement a food safety plan at each meal site and/or central kitchen.		
Local Wellness Policy & Triennial Assessment	Sponsors must have a local school wellness policy in place and the policy must undergo an assessment every 3 years, at a minimum.		
Food Service Management Companies (FSMC)	Sponsors may contract with a FSMC for no longer than one year, with options for a yearly renewal not to exceed four additional years.	Sponsors may contract with a FSMC for no longer than one year, with options for a yearly renewal not to exceed four additional years. Sponsors should work with their legal counsel to determine if opting into HSMA would create a material change in the scope of terms of their	Sponsors may contract with a FSMC for no longer than one year, with options for a yearly renewal not to exceed four additional years. Sponsors should work with their legal counsel to determine if opting into HSMA would create a material change in the scope of terms of their

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
		FSMC contract. If participation in HSMA creates a material change, sponsors will need to release a request for proposal for a new FSMC contract.	FSMC contract. If participation in HSMA creates a material change, sponsors will need to release a request for proposal for a new FSMC contract.
Afterschool Snack Program	Sponsors may apply at any time throughout the school year and can operate either by being area-eligible or non-area eligible. Area-eligible sites serve snacks at no charge to all children and are reimbursed at the Federal free rate. Non-area eligible sites serve snacks to all children based on the child's approved eligibility (free, reduced or paid) and snacks are reimbursed at the Federal free, reduced, and paid rates.	Sponsors may apply at any time throughout the school year and can operate either by being area-eligible or non-area eligible. Area-eligible sites serve snacks at no charge to all children and are reimbursed at the Federal free rate. Non-area eligible sites serve snacks to all children based on the child's approved eligibility (free, reduced or paid) and snacks are reimbursed at the Federal free, reduced, and paid rates.	Sponsors may apply at any time throughout the school year and can operate either by being area-eligible or non-area eligible. CEP schools that are area-eligible claim all snacks at the Federal free rate. CEP schools that are not area-eligible claim snacks under their established CEP claiming percentages.
Fresh Fruit and Vegetable Program	Eligible elementary schools apply to operate FFVP in June and are awarded grant funding to spend throughout the school year on fresh fruits and vegetables. Elementary schools must have a student	Eligible elementary schools apply to operate FFVP in June and are awarded grant funding to spend throughout the school year on fresh fruits and vegetables. Elementary schools must have a student	CEP elementary schools may qualify for FFVP by multiplying the individual school's ISP by 1.6. A CEP elementary school's individual ISP must be at least 31.25% to

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	Schools not implementing HSMA	Non- Community Eligibility Provision schools implementing HSMA	Community Eligibility Provision schools implementing HSMA
	enrollment made up of at least 50% of students who are eligible for free or reduced-price school meals.	enrollment made up of at least 50% of students who are eligible for free or reduced-price school meals	qualify for FFVP.

Additional Considerations	Benefits of opting in to HSMA:
	• Community Eligibility Provision schools:
	  ○ Promotes equity and reduces stigma of school meals
	  ○ Eliminates unpaid meal debt once implementing CEP
	  ○ Reduces administrative burden
	  ○ Increase in the number of students who eat breakfast and lunch each day
	  ○ Simplifies meal counting and claiming processes
	  ○ Easier implementation of alternative serving models (e.g., breakfast in the classroom, kiosks, etc.)
	  ○ Simplifies the administrative review
	  ○ Opportunities for funding to improve program operations, purchase local food and provide wages/stipends for local foods (starting school year 2024-25)
	• Non-Community Eligibility Provision schools:
	  ○ Promotes equity and reduces stigma of school meals
	  ○ Eliminates unpaid meal debt once implementing the program
	  ○ Increase in the number of students who eat breakfast and lunch each day
	  ○ Opportunities for funding to improve program operations, purchase local food and provide wages/stipends for local foods (starting school year 2024-25)
	Potential operational needs:
	• Adequate time to eat and number of lunch periods
	• Assess equipment and infrastructure
	• Staffing
	• Communication to families
	• Technology (i.e., point of sale systems, online meal application)
	Visit CDE School Nutrition Healthy School Meals for All webpage for more training and resources.		

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