



United States  
Department of  
Agriculture

Food and  
Nutrition  
Service

Mountain  
Plains  
Region

1244 Speer Boulevard, Suite 903  
Denver, Colorado 80204-3585

---

Reply to

Attn. of: SP 12-03

January 20, 2012

Subject: Mountain Plains Regional Office: School Programs Questions and Answers

To: STATE AGENCY DIRECTORS - Colorado ED, Iowa, Kansas, Missouri ED  
(Special Nutrition Programs) Montana OPI, Nebraska ED, North Dakota  
South Dakota, Utah and Wyoming ED

Attached are questions raised about school nutrition programs policies. You may use these responses as you move forward to implement the provisions of the Healthy, Hunger-Free Kids Act of 2010, as well as, general school nutrition program activities. However, please keep in mind these answers may be modified as new and revised Regulations are published.

If you have any questions or concerns, please contact your State primary contact.

***ORIGINAL SIGNED***

DARLENE SANCHEZ  
Regional Director  
Special Nutrition Programs

Attachment

## **Fresh Fruit and Vegetable Program (FFVP)**

- 1) **If a school is not spending FFVP funds and agrees to relinquish their grant money, can a State Agency grant out the funds to another school to be selected from the declined applications?**

**Answer:** Based on a thorough review of the guidance, Mountain Plains Regional Office (MPRO) could not find a place in Fresh Fruit and Vegetable Program (FFVP) policy that stated it would be unallowable for another school to be selected from the declined applications if a school chooses to no longer participate in the program. Since there is no official policy, the MPRO believes that this would be allowable practice. The next school in line would need to meet the FFVP selection requirements that include:

- Be an elementary school
- Represent the highest percentage of students certified for free and reduced price benefits
- Participate in the NSLP
- Have completed an annual application for the FFVP

Additionally, the school must also be provided with the training or other State requirements to run the program and have the ability to start the program in an efficient and expedited manner in order to use the funding.

- 2) **The FFVP Handbook states under administrative costs that “administrative costs include the FFVP share of salaries and fringe benefits for employees who compile and maintain claims for reimbursement and other financial reports, plan and write menus, order produce, track inventory, and coordinate nutrition promotion activities.” Would a portion of holiday benefits fall under this category and be a reimbursable cost for the FFVP?**

**Answer:** The answer to this question is possibly. The FFVP Handbook, on page 23, states the following about allowable administrative costs:

“Salaries and fringe benefits for employees, who compile and maintain claims for reimbursement and other financial reports, plan and write menus, order produce, track inventory, and coordinate nutrition promotion activities”

In the example above, the question states that a portion of FFVP funds would be used for holiday benefits. On pages 23-24, the FFVP Handbook also states the following:

“What should schools do to ensure that the FFVP runs smoothly?”

- Prorate costs: only the FFVP portion of expenses can be charged to the FFVP
- Budget carefully to stay within the 10 percent limit on administrative costs
- Make sure your expenses are reasonable and support the Program’s goals”

Based on the guidance in the FFVP Handbook, it would seem that holiday benefits would be an allowable cost for FFVP. The elements the school and the State Agency need to take into account is to assure the prorated amount is in proportion to the work put into FFVP; that the school remains within the 10% administrative cost limit; and that this cost, truly, is reasonable and supports the Program's goals.

**3) Are dates a reimbursable item under FFVP?**

**Answer:** The answer is possibly. The FFVP Handbook states on page 14 that FFVP does not allow:

- Processed or preserved fruits and vegetables (i.e., canned, frozen or dried)

Dates are fine to serve for FFVP as long as they are dried and picked from the tree. If the dates were intentionally left on the tree to be dried, then they are considered a reimbursable item because the growers classify the dates as fresh. If the dates are intentionally picked and dried, they are considered a dried fruit and would not be reimbursable.

**4) Is coconut a reimbursable item under FFVP?**

**Answer:** Coconut, unfortunately, is not a reimbursable item for FFVP in either a dried or fresh form. Coconut isn't classified as a fruit or vegetable in the USDA Food Buying Guide; it is, in fact, classified as an "other". In technical terms, coconut is a drupe which can be considered a fruit, a nut, and a seed. However, the National Office has stated that coconut is not a reimbursable item for FFVP.

**5) If a school offers the FFVP in the afternoon right after recess and wants to serve 4 oz. of 100% juice with their fresh fruit or vegetable snack, would the fruit or vegetable then no longer be allowable and be able to be reimbursed on the FFVP? (The school does not claim the juice as a part of the FFVP.) Or can the school offer the juice with the fresh fruit or vegetable and still get reimbursement for the fresh fruit and vegetable?**

**Answer:** The answer is the school would not be able to be reimbursed for FFVP if they served juice during the fruit and vegetable service. The FFVP Handbook states, on page 14, under the Which Fruits and Vegetables to Purchase and Serve, FFVP **does not allow:**

- "Fruit or vegetable juice"

A possible solution for the school would be to provide the FFVP snack before the fruit juice and do the two services at different times. Remember, it is the State Agency's discretion to provide a warning and corrective action or disallow the FFVP snack in this situation.