



**COLORADO**  
Department of Education

# **Breakfast After the Bell Nutrition Program Implementation Guide**

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## Preface

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### Acknowledgements

The Colorado Department of Education Office of School Nutrition thanks school district representatives who participated in subcommittee meetings and provided hands-on advice and input on implementation of the Breakfast After the Bell Nutrition Program. The office also thanks those who contributed to creating, editing and reviewing this implementation guide.

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## Introduction

This guide is a resource for school food authorities mandated to implement a Breakfast After the Bell Nutrition Program under Colorado’s House Bill 13-1006 [22-82.8-101] and to assist in meeting the requirements of the law. This document contains information on the law, criteria for mandated participation, an explanation of the importance of school breakfast, information regarding oversight by the Colorado Department of Education Office of School Nutrition and program compliance, and several resources to assist school food authorities with Breakfast After the Bell Nutrition Program implementation. The intent is not to provide information regarding the rules and regulations pertaining to the U.S. Department of Agriculture’s School Breakfast Program; however several resources to assist school food authorities in starting or expanding breakfast programs are provided.

## The Law – House Bill 13-1006

Colorado’s House Bill 13-1006 created the Breakfast After the Bell Nutrition Program in May 2013. Access the bill and fiscal note here:

[www.cde.state.co.us/osnbreakfastafterthebellnutritionprogramhb13-1006](http://www.cde.state.co.us/osnbreakfastafterthebellnutritionprogramhb13-1006).

The purpose of the program is to offer breakfast at no charge to each student enrolled in a public school that has 70 percent or more students who are eligible for free or reduced price lunch under the National School Lunch Program.

The Colorado Department of Education Office of School Nutrition assists school districts with the implementation of this law by providing this implementation guide, resources, training and technical assistance. The office offers technical assistance to public schools and school districts in regards to compliance with the Breakfast After the Bell Nutrition Program requirements, School Breakfast Program requirements, claims for reimbursement and other rules and regulations associated with the administration of this program.

The Breakfast After the Bell Nutrition Program has five main objectives. These objectives are to:

1. Increase the number of children eating breakfast on school days
2. Increase the consumption of nutritious foods, making breakfast programs more effective
3. Improve academic performance by preparing children to learn
4. Improve the overall health of children in Colorado
5. Generate additional revenue for school nutrition programs through federal and state reimbursements

### Benefits of Breakfast After the Bell

- Increases access to healthful breakfast meals
- Reduces social stigma associated with eating breakfast before school
- Can help combat childhood hunger

## Is my school required to participate?

Each year school food authorities must determine which schools under its jurisdiction must comply with the Breakfast After the Bell Nutrition Program. When school food authorities submit the annual application packet via CDE’s online system, schools meeting requirements for mandated participation in the Breakfast After the Bell Nutrition Program will be verified.



**School Year 2014-2015**

Beginning in school year 2014-2015, public schools participating in the National School Lunch Program with a free and reduced percentage from the prior year of 80 percent or greater, must offer a breakfast at no charge to each student after the tardy bell. Schools must implement Breakfast After the Bell Nutrition Programs by the first day of school for the 2014-2015 school year.

**School Year 2015-2016 and Each Year Thereafter**

Beginning in school year 2015-2016 and each year thereafter, public schools participating in the National School Lunch Program with a free and reduced percentage from the prior year of 70 percent or greater, must offer a breakfast at no charge to each student after the tardy bell. Schools must implement Breakfast After the Bell Nutrition Programs by the first day of the school year in which they are required to participate.

Use Table 1 to determine if your school is required to participate in the Breakfast After the Bell Nutrition Program in school year 2014-2015 and subsequent years.

**TABLE 1: Is my school required to participate?**

<b>1. Does your district have less than 1,000 students?</b>	<b>YES</b> - Your school is not required to participate
	<b>NO</b> - Move to question 2
<b>2. Does your school participate in the National School Lunch Program?</b>	<b>YES</b> - Move to question 3
	<b>NO</b> - Your school is not required to participate
<b>3. Did your school have a free and reduced percentage greater than or equal to 80 percent in school year 2013-2014?</b>	<b>YES</b> - Your school must participate in the 2014-2015 school year. Move to question 4.
	<b>NO</b> - Your school is not required to participate in the 2014-2015 school year, but may be required to participate in subsequent years. Move to question 4.
<b>4. Did your school have a free and reduced percentage greater than or equal to 70 percent in school year 2014-2015 or any year after?</b>	<b>YES</b> - Your school must participate
	<b>NO</b> - Your school may not be required to participate

The following guidelines must be followed in determining schools required to participate:

1. Pupil membership (October count) data from the prior school year must be used to determine district enrollment and school free and reduced percentages. This data is typically available in January each year.
  - a. School food authorities must use pre-K-12 pupil membership data.
  - b. Districts must use pupil membership data published on CDE’s website. Access current pupil membership data here: [www.cde.state.co.us/cdereval/pupilcurrentschool](http://www.cde.state.co.us/cdereval/pupilcurrentschool).
2. Do not round the free and reduced percentage (e.g. if a school has a free and reduced percentage of 79.87 percent in school year 2013-2014, this school would not have to participate in school year 2014-2015 because this percentage is less than 80.0 percent).

If a public school falls below the 70 percent threshold for two consecutive years, it has the option to continue participating in the program but is not required to do so. See examples below:



### Example 1:

School A has a free and reduced percentage of 81 percent in school year 2013-2014 and therefore must participate in school year 2014-2015. In

school year 2014-2015 School A has a free and reduced percentage of 69 percent and in school year 2015-2016 has a free and reduced percentage of 68 percent. School A is not required to participate in school year 2016-2017 but must participate in school year 2014-2015 and school year 2015-2016.

### Example 2:

School B has a free and reduced percentage of 71 percent in school year 2013-2014 and therefore is not required to participate in school year 2014-2015. In school year 2014-2015 School B has a free and reduced percentage of 70 percent and therefore must participate in school year 2015-2016. In school year 2015-2016 School B has a free and reduced percentage of 69 percent and in school year 2016-2017 has a free and reduced percentage of 68 percent. School B is not required to participate in school year 2017-2018 but must participate in school year 2015-2016 and school year 2016-2017.

### Exemptions

- Public or charter schools who do not participate in the National School Lunch Program are not required to participate.
- School districts with less than 1,000 students are not required to participate.
- Public schools that have a free and reduced percentage less than 70 percent for two consecutive years, have the option to continue the Breakfast After the Bell Nutrition Program but are not required to participate (see examples above).
- If federal per-meal reimbursements for free or reduced school breakfast and lunch are decreased below the 2013 levels or eliminated, schools required to offer breakfast under the Breakfast After the Bell Nutrition Program will be exempt.

### Time of Service

According to federal regulation, schools must offer breakfasts at or near the beginning of the school day. Under the Breakfast After the Bell Nutrition Program, breakfast must be served after the tardy bell. Breakfast must be served after the time by which the student would be considered tardy. Schools cannot add a first bell before the tardy bell to meet the requirements of this bill (i.e. a zero bell is not allowed). A school that offers breakfast to students before the bell may continue to do so. Schools with new breakfast after the bell programs may offer breakfast before the bell to students arriving early. However, all schools must offer breakfast after the bell to any student who does not receive a breakfast before the bell. School food authorities must accurately count, record

#### Does my school food authority need to modify our current breakfast programs?

- If there are schools in your school food authority that currently participate in the School Breakfast Program but offer breakfast before the bell, these programs may need to be modified to also offer breakfast after the bell to comply with Colorado's new law
- A school that offers breakfast to students before the bell may continue to do so. However, all schools must offer breakfast after the bell to any student who does not receive a breakfast before the bell.



and claim the number of breakfast meals actually served before and after the tardy bell to students by category (i.e. free, reduced price, paid). Additionally, all breakfast meals, whether offered before or after the tardy bell, must be offered at no charge to each student.

There is no duration of time in which school food authorities are required to offer breakfast after the tardy bell. The period of meal service is at the discretion of the school food authority. However, school food authorities must make breakfast after the bell accessible to all students and allow students a reasonable amount of time to eat their meal. Keep in mind, the aim of the Breakfast After the Bell Nutrition Program is to increase the number of children eating breakfast on school days and a longer serving period may help in obtaining this goal.

The time of breakfast service for each school required to participate will be reviewed annually when the application packet is submitted via the CDE OSN online system and every three years during administrative reviews. See [Program Evaluation and Improvement](#) section for more information.

Schools with 90 percent or more students riding the bus to school are allowed to offer breakfast under the Breakfast After the Bell Nutrition Program on the bus. However, such a school must also offer a breakfast at no charge to students arriving late or by another mode of transportation after the tardy bell.

Schools that operate a state-licensed before school care program may offer breakfast under the Breakfast After the Bell Nutrition Program during the before school program. However, such a school must also offer a breakfast at no charge after the tardy bell to students not participating in the before school care program.

School food authorities should follow district policy for offering breakfast on days when school starts late (e.g. late start days, snow delay, etc.).

## Breakfast Meal Pattern and Serving Model

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Breakfast meals served under the Breakfast After the Bell Nutrition Program must meet federal and state School Breakfast Program rules and regulations including nutrition and meal pattern requirements. Local school boards, district administration or school administration may determine the breakfast model. Different serving models may include breakfast in the classroom, grab n' go and breakfast in the cafeteria after first period. See [Resources](#) section for more information.

### Breakfast in the Classroom

Breakfast is delivered to the classroom and students eat their meal in the classroom with their peers. Typically foodservice staff delivers meals to the classrooms and either foodservice staff or the teacher mark off students who take a reimbursable meal. Breakfast meals may be packaged as one unit or as separate items and may consist of hot and/or cold items. This method allows for students to eat breakfast with their classmates while their teacher takes attendance, reads, or begins other classroom duties, with minimal impact on instructional time. This method also prevents overt identification of student eligibility status because all students eat together in the classroom.

### Grab 'n Go

Students can obtain their grab 'n go breakfast from a mobile cart or other convenient location during a break after the tardy bell. The breakfast meal is contained as one unit that students can easily pick-up and take to their classroom or other designated area to eat. Foodservice staff checks off each student that takes a reimbursable grab 'n go breakfast. This method provides a quick, simple way for students to grab a breakfast in the cafeteria or



kiosk(s) stationed in other areas of the school. The grab 'n go method simplifies the process of counting reimbursable meals for foodservice staff.

### **Breakfast After the Bell in the Cafeteria**

Classes of students can go to the cafeteria to eat their breakfast after the tardy bell. This method is the same as traditional before school breakfast in the cafeteria except for the timing of the breakfast service. This method allows foodservice staff to provide and account for reimbursable meals similar to lunch service without having to transport meals to other areas of the school.

### **Other**

May include breakfast at recess, nutrition breaks, breakfast in the halls and other creative methods to serve breakfast to students after the tardy bell.

## **How does my school food authority start the planning process?**

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There are several important factors to consider when implementing breakfast after the bell programs. To start a new School Breakfast Program, the guidelines outlined on the Colorado Department of Education Office of School Nutrition website must be followed. Access guidelines for starting a program here: [www.cde.state.co.us/nutrition/breakfast](http://www.cde.state.co.us/nutrition/breakfast).

Several tools have been developed to assist School Food Authorities in getting started with the planning process and to begin implementing breakfast after the bell programs. Access [Implementation Planning Tools](#).

### **Provision 2**

Provision 2 may be an implementation strategy for schools required to participate in the Breakfast After the Bell Nutrition Program. Provision 2 is an option outlined in the National School Lunch Act that enables schools and institutions to provide meals to all participating students at no charge and can simplify the application, eligibility determination and counting and claiming processes. Any school that participates in the National School Lunch Program or the School Breakfast Program may opt for Provision 2.

Provision 2 for breakfast can simplify counting and claiming breakfast meals, particularly for breakfast in the classroom or grab 'n go. It may be utilized for specific schools or for all schools for breakfast and/or lunch in the SFA. See *Provisional Programs* in the [Resources](#) section for more information.

### **Community Eligibility Provision**

The Community Eligibility Provision may be an option for schools required to participate in the Breakfast After the Bell Nutrition Program. The Healthy Hunger Free Kids Act of 2010 established the Community Eligibility Provision to provide eligible districts and schools with a reimbursement option to offer free school meals to all children in high poverty schools without collecting household applications. Districts can elect the Community Eligibility Provision for all schools or for certain schools meeting the eligibility criteria on or after July 1, 2014. See *Provisional Programs* in the [Resources](#) section for more information.

## **Benefits of the Breakfast After the Bell Nutrition Program**

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Food insecurity, meaning limited access to and availability of healthful foods for an active, healthy life, is a problem that many American children face daily. Hunger can impact the overall health and development of children and negatively affect their success at school. Breakfast after the bell programs can help combat childhood hunger by ensuring students start their day with a nutritious meal rather than an empty stomach. See *Food Insecurity* in [Resources](#) section for more information.

Offering breakfast at no charge to every student in the school after the bell can help reduce the social stigma associated with students eating breakfast before school. Students can share a meal with their peers and teacher to prepare for the day without feeling singled out because they are low income. Additionally, breakfast after the bell programs reaches students who may have missed breakfast due to a busy morning schedule or inability to get to school early. Offering breakfast after the bell helps eliminate these barriers and increase breakfast participation rates.

Not only can breakfast after the bell help combat childhood hunger and reduce the stigma sometimes associated with school breakfast, there are several health and academic benefits associated with breakfast consumption. Unfortunately many students are skipping breakfast and missing out on these benefits. Offering breakfast to all students after the bell helps ensure that each student has access to this important, nutritious meal.

Studies show that children who eat breakfast eat a greater variety of important nutrients such as calcium and fiber<sup>i,ii</sup>. Additionally, research shows that students who eat school breakfast have reduced rates of absence and tardiness<sup>iii</sup> and decreased rates of violence and aggressive behavior<sup>iv</sup>. When students are well-nourished and ready to learn they may also have more potential for academic success. Studies show that children who eat breakfast have improved math and reading scores<sup>v,vi</sup>, improved scores on standardized tests<sup>vii</sup> and improved comprehension and memory<sup>viii</sup>.

## Program Evaluation and Improvement

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### Administrative Reviews

The Colorado Department of Education Office of School Nutrition will evaluate the school food authority's compliance with the Breakfast After the Bell Nutrition Program as part of the administrative review process by assessing compliance with the following questions:

1. Is the school food authority in compliance with the Breakfast After the Bell Nutrition Program by implementing breakfast after the bell programs in all schools required to participate?
2. Is the school food authority in compliance with the Breakfast After the Bell Nutrition Program by offering a breakfast at no charge to all students in schools required to participate?
3. Is the school food authority in compliance the Breakfast After the Bell Nutrition Program by offering a breakfast at no charge on the bus only in schools demonstrating that at least ninety percent of its students take bus transportation to school and does the school offer breakfast after the bell to any student who does not ride the bus?



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### **Technical Assistance/Corrective Action**

CDE's Office of School Nutrition must deem a school food authority compliant with the Breakfast After the Bell Nutrition Program if the requirements of the review are met, as described above. Deficiencies identified must result in a noncompliant evaluation.

Noncompliance will be addressed through technical assistance and corrective action dependent upon the severity of the findings.

### **Fiscal Action**

This is a state specific area, thus fiscal action is not required; however, CDE's Office of School Nutrition will consider withholding reimbursement payments, in whole or in part, from any school food authority for repeated or egregious violations that are not corrected.



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## Resources

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Access the below School Breakfast Program resources here:

[www.cde.state.co.us/nutrition/osnbreakfastafterthebellnutritionprogrambabnp](http://www.cde.state.co.us/nutrition/osnbreakfastafterthebellnutritionprogrambabnp).

- Best practices
- Financial analysis
- Food insecurity
- Food safety
- Funding opportunities
- Identifying potential challenges
- Implementation Planning Tools
- Marketing
- Meal counting and claiming
- Menu planning
- Provisional Programs
- Self-evaluation
- Serving method
- Stakeholder engagement



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Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339; or (800) 845-6136 (Spanish).

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## Endnotes

<sup>i</sup> Barton, B., Eldridge, A., Thompson, D., Affenito, S., Striegel-Moore, R., Franko, D., et al. (2005). The relationship of breakfast and cereal consumption to nutrient intake and body mass index: the National Heart, Lung, and Blood Institute Growth and Health Study. *Journal of the American Dietetic Association*, 105(9), 1383-1389.

<sup>ii</sup> Affenito, S., Thompson, D., Dorazio, A., Albertson, A., Loew, A., Holschuh, N. (2013). Ready-to-Eat Cereal Consumption and the School Breakfast Program: Relationship to Nutrient Intake and Weight. *Journal of School Health*, 83(1), 28-35.

<sup>iii</sup> Taras H. (2005). Nutrition and student performance at school. *Journal of School Health*, 75(6), 199-213.

<sup>iv</sup> Hahn, R., Fuqua-Whitley, D., Wethington, H., Lowy, J., Liberman, A., Crosby, A., et al. (2007). The effectiveness of universal school-based programs for the prevention of violent and aggressive behavior. *Morbidity and Mortality Weekly Report*, 56, 1-11.

<sup>v</sup> Wahlstrom, K., Begalle, M. (1999). More than test scores: Results of the universal school breakfast pilot in Minnesota. *Topics in Clinical Nutrition*, 15(1), 17-29.

<sup>vi</sup> Powell, C., Walker, S., Chang, S., Grantham-McGregor, S. (1998). Nutrition and education: a randomized trial of the effects of breakfast in rural primary school children. *The American Journal of Clinical Nutrition*, 68(4), 873-879.

<sup>vii</sup> Meyers, A., Sampson, A., Weitzman, M., Rogers, B., Kayne, H. (1989). School breakfast program and school performance. *American Journal of Diseases of Children*, 143(10), 1234-1239.

<sup>viii</sup> Benton, D., Parker, P. (1998). Breakfast, blood glucose, and cognition. *The American Journal of Clinical Nutrition*, 67(4), 772S-778S.

