

# Summer Food Service Program (SFSP) Summer 2021

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# Program Overview

# Governing Regulations

- 7 CFR 225
  - 7 is for the US Department of Agriculture
  - CFR means Code of Federal Regulations
  - <https://www.fns.usda.gov/part-225%E2%80%94summer-food-service-program>
- USDA FNS Policy Memos  
[https://www.fns.usda.gov/resources?f%5B0%5D=program%3A39&f%5B1%5D=resource\\_type%3A160](https://www.fns.usda.gov/resources?f%5B0%5D=program%3A39&f%5B1%5D=resource_type%3A160)

# SFSP Resources

- VT AOE SFSP webpage
  - <https://education.vermont.gov/student-support/nutrition/summer-food-service>
- SFSP Program Guides
  - <https://www.fns.usda.gov/sfsp/handbooks>
- COVID-19 Guidance page
  - <https://education.vermont.gov/news/covid-19-guidance-vermont-schools#nutrition>

# Structure

- Operates on the federal fiscal year (October 1 to September 30)
- Federally-funded by the United States Department of Agriculture (USDA)
- State-administered by Vermont Agency of Education Child Nutrition Programs
- The program consists of **sponsors**, who are managerially and financially responsible for the program, and **sites**, which are the physical locations where meals are served.

# Sponsors

- Sponsors accept an agreement, “Permanent Agreement”, with Vermont Agency of Education Child Nutrition Programs.
- Sponsors can be supervisory unions/school districts, private non-profit organizations, government entities, residential camps, or other non-profit organizations.

# Sites

- Aside from delivering to households and bus stops, you must have a separate Site Application for each site where meals are served.
  - Meals delivered to households and bus stops will be claimed under the site where the meals are prepared.
- However, if you plan to stay at a bus stop for 30 minutes or more, it must be listed as a separate site.
  - Meals served at these bus stop sites will be claimed under their respective site claim each month.
- There can be multiple programs and activities taking place at a site.



# Serving Childcares

- If childcare programs would like to walk with their children to open SFSP meal sites, they can receive grab-and-go meals.
- If childcare programs would like to have meals provided to their location, to be consumed there, they must be registered as a site. You must also ensure they are not also planning to claim reimbursement for those meals, either under the SFSP or Child and Adult Care Food Program (CACFP).

# Updating Sites and Adding New Sites

- Site information can be updated throughout the summer, however must be approved in the Application Packet prior to implementation.
- New sites can be added at any time throughout the summer, however no reimbursement will be received for meals served at these sites prior to the approval of the Site Application.
- Please allow for a minimum of 3 business days prior to implementation of changes or start of new site.

# SFSP Application Packet Approval and Allowable Changes Procedure

- Please refer to the SFSP Application Packet Approval and Allowable Changes Procedure:  
<https://education.vermont.gov/documents/edu-SFSP-Application-Packet-Approval-and-Allowable-Changes-Procedure>
- This details the requirements for retroactively adding dates of operation

# For-Profit Sites

- Must be under a non-profit sponsor
- Must be an open or restricted open site
- Site operators cannot prepare the meals
- Only sponsor staff/volunteers may distribute meals
- Refer to SFSP 13-2011 “For-Profit Locations as Meal Sites in the Summer Food Service Program”
  - <https://fns-prod.azureedge.net/sites/default/files/SFSP-13-2011.pdf>

# Meal Operation Waivers

# Waivers Extended until 09/30/2021

- In Summer 2021, SFSP programs can run up until the school year begins
- Even though the most recent round of waiver extensions expires on September 30<sup>th</sup>, 2021, SFSP must end when school starts in the fall

# Waiver of requirement that children be present

- On March 9, 2021, the USDA extended the nationwide waiver to allow parents and guardians to pick up meals without children present or for meals to be delivered without children present until September 30, 2021.
- [COVID-19: Child Nutrition Response #76 Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children for Summer 2021 Operations- EXTENSION 6](#)

# Congregate Feeding Waiver

- On March 9, 2021, the USDA extended the nationwide waiver to allow non-congregate feeding in the Summer Food Service Program, meaning grab-and-go or household/bus-stop delivery until September 30, 2021.
- [COVID-19: Child Nutrition Response #75 Nationwide Waiver to Allow Non-Congregate Feeding for Summer 2021 Operations – EXTENSION 6](#)



# Information Provided with Non-Congregate Meals

- If meals are served without children present, they must include a statement indicating meals are to be consumed by children, 18 and under.
- If the meals are perishable, they must include expiration dates and information about maintaining appropriate temperatures.
- Informational sheets must contain the short non-discrimination statement “This institution is an equal opportunity provider.”

# Integrity Plan to Prevent Duplicate Meals

- There must be a system in place to prevent duplication of meals served so that children that are in an on-site program receiving meals, do not also get non-congregate meals for those same days, or do not get non-congregate meals from different sites for the same days.
- This can be accomplished through signage at the grab and go location, information provided with the meals, and information provided to households on the program website, in the form of newsletters, email, or social media communicating that they should only receive one meal type, per child, per day.

# Meal Service Times Waiver

- On March 9, 2021, the USDA extended the nationwide waiver of meal service time restrictions until September 30, 2021.
- Meal services can be at any time.
- Meal services can be for any length of time.
- Still required to include meal service times in Site Application.
- Combined with the non-congregate feeding waiver, this allows multiple meals to be served at one time, such as breakfast and lunch together, and multiple days worth of meals to be served at one time, up to 7 days worth.
- [COVID-19: Child Nutrition Response #78 Nationwide Waiver of Meal Service Time Restrictions for Summer 2021 Operations- EXTENSION 3](#)

# Delivery and Grab and Go

- School Food Authorities (SFAs) may deliver meals to households with written permission on file from the household.
- If you have already obtained permission, it does not need to be re-obtained for summer 2021 operation.
- Non-profit sponsors may only do household delivery (with written permission on file from the household) if no SFA in the area is providing this service.
- SFA and non-SFA sponsors may offer grab-and-go meals.

# Application Packet – Non-Congregate Feeding

- While Question 43 does not appear to have anything to do with non-congregate meals, it is being used to capture this information in the Site Application.
- This includes grab and go and/or delivery.
- Include specific details such as dates available, times of pick-up, specific location at the site (such as the back door or curb in front of the site), how many days' worth of meals provided at a time, if doing bulk meals, and any other logistical information.

# Application Packet – Meal Service Times

- If providing on-site meals and non-congregate meals, and the times of the meal service for the grab and go or delivered meals are different than the in-person meal service times, indicate the times of the congregate meals in questions B3 for breakfast and L3 for lunch and the times of non-congregate meals in question 43 of the Site Application.

# Reimbursement Rates

# Funding Structure

- SFSP is a reimbursement-based program.
- Sponsors are reimbursed at a set rate for eligible meals and snacks served to children at approved sites.
- Funding = # meals  $\times$  reimbursement rate



# 2021 SFSP Reimbursement Rates

<b>Meal</b>	<b>Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep</b>	<b>Urban/Vended</b>
Breakfast	2.4625	2.4150
Lunch/Supper	4.3175	4.2500
AM/PM Snack	1.0200	0.9975

# Administrative and Operating Reimbursement

- SFSP reimbursement is broken into Administrative Reimbursement and Operating Reimbursement.
- All sites receive the same operating rates for meals, but depending on the site, the administrative reimbursement rate may be different.

# Administrative Reimbursement

- Rural/Self-Prep
  - Rural/Vended
  - Urban/Self-Prep
  - Urban/Vended
- 
- Urban/Vended is the only type of site that receives the lower-level of administrative reimbursement.

# Urban vs. Rural

- Chittenden, Franklin, and Grand Isle counties are considered urban. The rest of the counties are rural.

USDA Rural Designation Map:

<https://www.fns.usda.gov/rural-designation>

# County Determination

- Indicate site county in Question 4. in the Site Application
- It is critical that this is accurate because it affects your reimbursement rate.

# Self-Preparation vs. Vended

- Self-preparation means the sponsor prepares the meals that will be served at the site(s) and does not contract with a Food Service Management Company (FSMC), caterer, or school or sponsor for the preparation of meals, even if the meals are sent to other sites for service.
- Vended means an FSMC, caterer, or school or sponsor prepares the meals, whether the meals are prepared on-site come from a central kitchen, they are considered vended.

# “Meal Service Method” for each type of meal service.

- Satellite Site – Receives meals from a (Central Kitchen)
- Self-Prep – Prepares on site and serves on site
- Vended by School Food Authority (SFA) – meals are purchased from a school
- Vended by Food Service Management Company (FSMC) – site with a FSMC contract providing meals
- Vended by another SFSP Sponsor – meals purchased from another sponsor
- It is critical that this is accurate because it affects your reimbursement rate.

# Food Production Facility

- Must be completed for central kitchens and any school with FSMC providing meals, even with on-site preparation.
- For FSMC sites, select “Vended” from the drop-down menu in question 1.



# Site Types

# Types of Sites

- Open
- Closed-Enrolled
- Non-Residential Camp
- Residential Camp

# Area Eligibility Waiver

- On March 9, 2021, the USDA extended the waiver to the area eligibility waivers through September 30, 2021.
- Open and Closed-Enrolled sites can be established in non-area eligible locations.
- [COVID-19: Child Nutrition Response #77 Nationwide Waiver to Extend Area Eligibility Waivers for Summer 2021 Operations – EXTENSION 4](#)

# Area Eligibility Waiver Continued

- The waiver cannot be used for residential and non-residential camps.
- If a site is not area eligible and not a school, the sponsor must email the CNP team describing why the site is well-located to serve children impacted by COVID-19.

# Closed-Enrolled Area Eligibility

- On March 9, 2021, the USDA extended the nationwide waiver to allow closed-enrolled sites to use area eligibility through September 30, 2021.
- Combined with the area eligibility waiver, closed-enrolled in needy area sites may be established in non-area eligible locations.
- [COVID-19: Child Nutrition Response #80 Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites for Summer 2021 Operations – EXTENSION 3](#)

# VTAOE CNP Area Eligibility Plan

- For more information on how Vermont has chosen to implement this waiver, please see Waiver of Area Eligibility Requirements for SFSP/SSO During COVID-19:  
<https://education.vermont.gov/documents/waiver-of-area-eligibility-requirements-for-sfsp-sso-during-covid19>

# Open Sites

- All children, 18 and under, can receive a meal, no questions asked.
- The sponsor is reimbursed for meals served to all children.
- May serve up to two meals/snacks a day.
- Stigma-free, barrier-free method of meal service as it is the site that qualifies, not the individual children.
- Qualification through area eligibility:
  - School Data: Free and Reduced Eligibility Report 2021: <https://education.vermont.gov/documents/education-nutrition-2021-free-and-reduced-eligibility-report>
  - Census Data: FRAC Summer Food Mapper: <http://216.55.168.186/FairData/SummerFood/map.asp?command=scope&map=0>
  - Housing Data

# Pre-Ordering and Open Sites

- It is fine to strongly encourage folks to pre-order meals to better determine how many meals to prepare, but cannot require pre-order for open sites and if folks show up, the expectation is that they will still be served.



# Open Sites: How many meals to prepare?

- Was it a site last year? Look at ADA.
- How many kids live in the town; proximity to the site? Can they easily walk or bike?
- Any programming taking place, summer school, recreation?
- Prep a few extra, make something that can be re-used the next day if there are leftovers.
- Base it on first few days!

# “5-Year Rule” for Open Sites

- Open sites are eligible for 5 years
- This creates consistency and builds trust
- Studies show it takes about 3 years for a Summer Meals site to be well-established in a community
- However, as possible, update data every year, to extend the 5-year count.

# Restricted Open

- Site attendance is limited for safety and security reasons.
- This should not be to stop area children from participating in the program.

# Closed Enrolled

- For a set population of children.
- The sponsor is reimbursed for meals served to all the children.
- Sites can be reimbursed for up to two meals/snacks.
- This cannot be to only serve for academic Summer School programs.

# Academic Summer School

- Programs that are operated by the SFA/school that students are required to attend or would result in a grade on the student's transcript.
- Must be open sites or operate NSLP in the Summer

# Summer Feeding Options

- Summer Food Service Program (SFSP)
- NSLP Seamless Summer Option (SSO)
  - SFAs only
- National School Lunch Program (NSLP) in the Summer
  - SFAs only

# Non-Residential Camp

- This is where fewer than 50% of the children in a set program qualify for free and reduced-price meals.
- Must provide activities for the children.
- Sponsors are only reimbursed for meals served to eligible children.
- Can serve up to three meals/snacks per day.

# Residential Camp

- This a residential summer camp where the kids are staying over night.
- Must provide activities for the children.
- Sponsors are only reimbursed for meals served to eligible children.
- Can serve up to three meals/snacks per day.



# Approving Free and Reduced Applications

- If you are a camp or other non-profit organization, we can help you with approving applications.
- Free and Reduced Meals page of VTAOE CNP website:
  - <https://education.vermont.gov/student-support/nutrition/school-programs/free-and-reduced-meals>
- Eligibility Manual for School Meals is a helpful resource
  - <https://www.fns.usda.gov/cn/eligibility-manual-school-meals>
- Summer Food Service Program (SFSP) Income Eligibility Guidelines 2021
  - <https://education.vermont.gov/documents/edu-nutrition-summer-food-service-program-income-eligibility-guidelines-2021>

# Advances and SFSP State Money

# State Summer Food Service Funds

- Each year, we receive \$51,386.99 from the state to divide among returning sponsors and new sponsors.
- Allocation is based on number of meals served at non-residential camp sites in the previous summer or projected number of meals for new sponsors.
- This money can be used for start-up costs associated with beginning the program each summer.
- This money has a 3455 fund code and you receive it the same way you are paid program reimbursement.

# Advance Amounts

- For returning sponsors, the amount is based on a percentage of the prior year's claim for reimbursement from the same month.
- For new sponsors, the amount is based on the projected number of meals to be served.
- If the advance provided exceeds the claim for reimbursement, the sponsor must repay the amount.

# Advances for Operating Costs

- May request at least 30 days before the payment dates of June 1, July 15, and August 15.
- Sponsors must provide documentation that non-SFA sponsor personnel have received training prior to receiving the second month's operating advance.
- Sponsors may not receive advances for operating costs in any month where they operate less than 10 days.

# Advances for Administrative Costs

- May request at least 30 days before June 1 and July 15.
- If sponsors operate less than 10 days in June, but at least 10 days in August, the second month's advance payment will be issued on August 15.
- Sponsors that operate less than 10 days may not receive advances for administrative costs.

# Requesting an Advance

- Sponsors may request advances through their Organization Application section of the Application Packet by answering “Yes” to question 40. “Will the Organization be requesting Advance Payments?”
- Go to the Advance Requests screen in the Applications section.

# Application Packet Process



# Application Packet Updates for Sponsors currently operating in School Year 2020-2021

- For existing sites that will not continue to operate in summer 2021, the end date can be updated from June 30<sup>th</sup> at any time.
- For existing sites that will continue to operate in summer 2021, please make the updates at the end of the school year, prior to the changes taking effect.
- New sites may be added throughout the summer, but sponsors must create Site Applications for new sites prior to the beginning of site operation.
- Must allow enough time for State agency to approve the changes and additions.

# SFSP Sponsors that did not operate in School Year 2020-2021

- The SFSP Application Packet is due June 1<sup>st</sup>.
- New sites may be added throughout the summer, but sponsors must create Site Applications for new sites prior to the beginning of site operation.
- Must allow enough time for State agency to approve the changes and additions.

# Requested Waiver Extension

- USDA did not extend [COVID 19: Child Nutrition Response #69 Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and Provide Flexibility for Pre-Approval Visits in the Summer Food Service Program-EXTENSION](#) past June 30<sup>th</sup>, 2021.
- We have requested the ability to provide reimbursement for meals served prior to written approval for the month of July 2021

# Online System

- Summer is in the Summer Food Service Program module of the VTCNP system. This is the red tile on the homepage.
  - <https://vt.cnpus.com/prod/Splash.aspx>
- If you need a username or updated permission levels in the system, please email Jamie Curley at [jamie.curley@vermontgov](mailto:jamie.curley@vermontgov).

# Application Packet

- Organization Application
- Budget Detail
- Food Production Facility List
- Site Field Trip List
- Checklist Summary:
  - Letter to Department of Health
  - Media Release
- Attachment List
- Site Applications for each site

# Organization Application

- Sponsor-level information
- Indicate an Authorized Signer, allows user to submit Application Packet and Claims for Reimbursement (cannot be a FSMC employee).
- Sponsor-level Racial and Ethnic Data

# Budget Detail

- It is an administrative planning tool and it sets boundaries to help ensure financial viability.
- Estimated Operating Costs
- Estimated Administrative Costs

# Total Meals Projected

- The Site Applications must be completed prior to the Budget Detail.
- The projected number of meals in the Operating Reimbursement and Administrative Reimbursement sections of the Budget are automatically populated once this information is entered in the Site Applications.



# Financial Management in SFSP

- FNS Instruction 796-4, Rev. 4 Financial Management – Summer Food Service Program for Children
- <https://fns-prod.azureedge.net/sites/default/files/796-4.pdf>

# Operating Costs

- Operating costs are those that are directly related to the **preparation** and **service** of meals
- And the **direct supervision** of children during serving time

# Food Costs

- Maintain vendor invoices and delivery receipts
- Transportation charges
- Storing and distributing USDA Foods

# Non-Food Supplies

Non-food supplies are non-edible.

- Paper and plastic utensils and service items
- Cleaning supplies

# Labor Costs

## Salary and Fringe Benefit Costs

- Preparation, delivery, and service of meals, and clean-up
- Direct supervision of children
- Record-keeping

# Transportation

- Bringing children in rural areas to meal sites in rural areas
- Bringing meals to children

# Other Direct Operating Costs

- Other potential costs could include the rental of food service preparation and dining facilities
- Equipment for storage, preparation, service, and transportation

# Administrative Costs

- Administrative Labor
  - Program administrator/food service director
  - Site supervisors
  - Clerical support (claim filers)
- Office Space Rental
- Other expenses can include mileage, telephone, office supplies, and audit fees



# Allowable Costs

- Staff pay and benefits for operation and administration
- Overtime pay
- Hazard pay
- Food
- Utilities
- Equipment, including extra storage and refrigeration units
- Equipment repair
- Small wares, like coolers, ice packs, and hot carriers
- Packaging materials, such as paper bags, clam shells, other containers
- Kitchen cleaning

# Allowable Costs Continued

- Cleaning supplies
- General supplies, like paper goods and utensils
- Printing of informational handouts to accompany the meals
- Personal Protective Equipment (PPE), such as gloves and masks
- Transportation of meals to children or children in rural areas to meal sites in rural areas
- Gas
- Staff to drive buses/vans
- Staff to hand out the meals
- Indirect costs with approved rate from VT AOE

# Indirect Costs

- Only allowed for Administrative Costs
- SFAs must have an approved indirect cost rate from the finance team in Vermont Agency of Education
- Non-SFA sponsors must have an approved indirect cost rate from AOE or their cognizant agency

# Unallowable Costs

- Non-program adult meals are not allowable costs.
  - Sponsors may cover the cost with non-federal funds or may charge non-program adults for meals.
- Other unallowable meals, such as dropped meals, are not reimbursable.
- Additional foods.
- Capital expenditures are not allowed.
- Other capital assets, including vehicles.

# Other Income to the Program

Any other income to the program, besides reimbursement:

- includes money for adult meals
- donations, monetary or food (estimate monetary value of donated food)
- grants received
- general fund support

# Leftover Funds: Revenues in Excess of Expenses

- Can be used to improve SFSP
- Can be put towards the following year's Summer Meals Program
- Can be used for other Child Nutrition Programs

If sponsor ceases program operation, excess funds must be returned to Vermont Agency of Education Child Nutrition Programs.

# Food Production Facility List

- If a site receives meals from a central kitchen, a Food Production Facility must be entered for the central kitchen.
- If a site has a Food Service Management Company (FMSC) or vendor prepare the meals, a Food Production Facility must be entered for that site and include information about the contract or vended meals agreement.

# Site Field Trip List

- Field trips are allowed, but sponsors must notify the State agency.
- All program requirements must be followed, this includes:
  - Point of Service (POS) meal counts
  - The “And Justice for All” poster must be displayed
  - Meals must be kept at safe temperatures
  - Breakfast, lunch, and supper meals offered must include milk



# Checklist Summary

- Upload documents and check the box “Document submitted to state”
- Press Release
  - Mandatory notice alerting the public to program operation, must be sent out prior to start.
- Health Department Notification
  - Please see slide Health Department Notification in the Checklist Summary for more information

# Checklist Summary, If Applicable

- Food Service Agreement or Contract
  - Must upload applicable document if using a FSMC or vendor for meals
- Census documentation required
  - Sites that use census data to establish eligibility, must upload a screenshot from the FRAC Summer Food Mapper or the USDA Area Eligibility Mapper

# Attachment List

- This can be used to upload any documents.
  - This is where the Unitized Meal Waiver will be uploaded, if applicable.
  - If you have a field trip schedule, rather than entering in individual field trips, you can upload that here.

# Site Application(s)

- Site-specific information for each meal site.
- Logistical information about location, contact information, and meals served.

# Days of Operation and Meal Combinations

- Meal types include breakfast, AM snack, lunch, PM snack, and supper
- Non-residential and residential camps
  - up to 3 meals a day, any combination there of
- Open and closed enrolled sites
  - up to 2 meals a day; cannot do lunch and supper in the same day
  - can do different combination of meals on different days
- You can serve weekend meals!

# Times

- Meals may be served at anytime and there is no required time for meal service length or time between meals, however:
- If doing more than one meal for congregate service, they must be served in order
  - breakfast cannot be served after lunch
- If sites are providing on-site meals and non-congregate meals, and the times of the meal service for the grab and go or delivered meals are different than the in-person meal service times, indicate the times of the congregate meals in questions B3 for breakfast and L3 for lunch and the times of non-congregate meals in question 43 of the Site Application.

# Site Caps

# Establishing Site Caps

- In the Site Application, for each meal offered, sponsors must enter the projected Average Daily Participation (ADP).
- Aim a littler higher than you anticipate for the ADP.
- Based upon this information, the State agency will establish a Site Cap that is 20% greater than the projected ADP.



# Changing Site Caps

- If the number of meals served within the claiming period appears as though it might potentially exceed the Site Cap, the sponsor must email the State agency to request to increase the ADP and thus that the Site Cap be increased.
- This must be done prior to submitting the Claim for Reimbursement. The sponsor will need to revise the Site Application to revise the ADP and re-submit the Application Packet for approval by the State agency. The State agency will increase the Site Cap and approve the Application Packet.
- Afterward, the sponsor can enter the claim without error.

# Site Cap Error Codes

If you attempt to claim more meals than the approved Site Cap, you will receive the following error notifications from the online application and reimbursement system which will prevent you from submitting the claim.

- “223220 The number of Breakfast first meals served plus camp meals for Self-Prep and Vended cannot exceed the ‘maximum meals.’”
- “223240 The number of Self-Prep Breakfast first meals served cannot exceed the number of participating sites times the ‘maximum number of meals that may be served.’”
- “223420 The number of Lunch first meals served plus camp meals for Self-Prep and Vended cannot exceed the ‘maximum meals.’”
- “223440 The number of Self-Prep Lunch first meals served cannot exceed the number of participating sites times the ‘maximum number of meals that may be served.’”

# Claims for Reimbursement

# Claims for Reimbursement Overview

- SFSP During Unanticipated School Closures: Claim Submission Training
  - <https://education.vermont.gov/documents/education-nutrition-sfsp-during-unanticipated-closures-claims-training>
- SFSP Claim for Reimbursement Submission: Illustrated Step-By-Step Guide
  - <https://education.vermont.gov/documents/education-nutrition-sfsp-claim-for-reimbursement-submission-step-by-step-guide>

# Claim Submission Dates

- Claims for Reimbursement must be submitted within **60 days** of the last day of the claim month.
- \*For deadlines that fall on a Saturday, Sunday, or a Federal Holiday, the due date is the next business day (this is for all programs, except Fresh Fruit and Vegetable Program (FFVP))
- “60-Day Deadline Dates for Claims for Reimbursement” on CNP website:

<https://education.vermont.gov/documents/60-day-deadline-dates-for-claims-for-reimbursement>

# Late Claims

- Exceptions for late claims may be requested in writing to the State Director of Child Nutrition Programs, Rosie Krueger, [mary.krueger@vermont.gov](mailto:mary.krueger@vermont.gov), however they may only be approved once in a 36-month period, by program.
- “Late Claim Procedure and Corrective Action Template” on CNP website:  
<https://education.vermont.gov/documents/late-claim-procedure-cap-template>

# Starting a New Claim

- In the Summer Food Service Program section of the [online application and reimbursement system](#), click on “Claims” next to “Applications” in the top left hand corner of the screen.
- On the next page, click on “Claims – SFSP”.
- This will take you to a page titled “2020-2021 SFSP Claim Year Summary,” which shows all of the months of the year. The months in which you operated will be blue, and the rest of the months will be grayed out.
- Select the applicable month.
- On the next page, “2020-2021 SFSP Claim Month Details,” hit the red button, “Add Original Claim”.

# Site Information

- On the next page, “2020-2021 SFSP Claim Site List”, the sites will be listed and next to each site, it will say “Add”.
- Hit “Add” and on the next page, “2020-2021 SFSP Site Claim Report”, you will put the number of operating days for the claim period and number of meals served by meal type.
- The Average Daily Attendance for each meal type is determined by dividing the total number of first meals served by the Total Number of Days Food Served. Round down to the nearest whole number.
- Hit the red “Save” button”. It will say “The Site Claim has been saved”. Then hit “Finish” and repeat for all sites that operated that month.



# Organization Information

- Once you have completed a “2020-2021 SFSP Site Claim Report” for each site that operated that month, hit the red “Continue” button.
- This will take you to the “2020-2021 SFSP Claim for Reimbursement – Organization Information” page.
- “Question 1. Period covered by this claim”, will automatically populate with the first and last calendar days of the month.
- You must change the dates to reflect your approved operating dates for whichever claim month.
- This will show you all your site meal totals, combined.
- Hit the red “Continue” button.

# Certify and Submit

- The page “Summer Food Service Program Claim Month Details for month/year” (whichever relevant month) will show a summary of your reimbursement.
- At the bottom, check off the Certification Statement box and hit the red “Submit for Payment” button.
- When you have finished submitting the claim for reimbursement, the email confirmation will be sent to whoever is listed as the “Claims Contact” in the Organization Application portion of the SFSP Application Packet.

# Claim Submission Procedure

- Sponsors should have a process in place to ensure that two sets of eyes are involved in entering and submitting the Claim for Reimbursement to help prevent any underclaim or overclaim issues due to human error.
- The CNP team strongly recommends that a sponsor representative enters the information in the Site Claim Reports and provides the back-up documentation (*Monthly Consolidated Meal Count Sheet* and the *Daily Meal Count Sheets*, if applicable) to another sponsor representative to look over the documents and entered information. This edit check process will help to ensure that the information was entered correctly before the claim is submitted!

# Modifying and Revising

- When a claim for reimbursement has been “Accepted”, but not yet “Processed”, it can be changed by clicking “Modify”.
- When a claim for reimbursement has been “Processed”, it can be changed by clicking “Add Revision”.
- If the revision is submitted past the 60-day deadline it is considered a late claim; please refer to **Late Claims** slide.

# Serving Second Meals

- Serving seconds is an option, however you are only reimbursed for 2% of first meals served.
- Sponsors should not prepare meals with the intention of serving seconds.
- Second meals may only be served after all participating children have been served a first meal.
- But who gets a second?
- Some only do it on Fridays when leftovers will not last over the weekend.

# Reimbursement for Second Meals

- You can only be reimbursed for up to 2% of first meals served.
- This is based on the total number of first meals served by meal type each claiming period.
- The system calculates this number.

# Meal Counts

# Point of Service (POS) Meal Counts

- Point of Service (POS) meal counts must be taken at the time each child/household receives a reimbursable meal.
- Meal counts cannot be taken before the meal is served or counted after the meal service.
- Counts based on pre-order numbers, attendance numbers, or counting trays or number of leftovers is not allowable.



# Meal Counts for Camp Sites

- Meals must be tracked by child's name and eligibility status.
- If using an electronic Point of Service (POS) or paper roster, sites must prevent overt identification of eligibility status by ensuring that the child's status is coded or in the case of a paper roster, not on it at all.
- It is critical that we continue to maintain confidentiality and prevent overt identification of free and reduced-price status.

# Meal Counts for Open and Closed-Enrolled Sites

- Meal counts do not need to be tracked by child's name because you receive the same reimbursement for meals served to all children.

# Daily Meal Counts

- If sites are providing multiple meals at the same time, such as breakfast and lunch, meal counts must be maintained for each meal type.
- When providing multiple days worth of meals at a time, meal counts must be maintained for each day.
- These can be done on the same sheets, if it clearly indicates which meals and days are included.
- Sites must still be able to account for each meal, especially as they have different reimbursement rates.

# Daily Meal Count Form Options

Sponsors may use:

- Electronic POS system
- Some form of electronic spreadsheet
- Paper tic sheet, such as the recommended Template Daily Meal Count Form:

<https://education.vermont.gov/documents/edu-nutrition-daily-meal-count-form>

# Daily Meal Count Form

- If the Daily Meal Count Form is used, it must be completed correctly, with meals hashed off or circled.
- Drawing a continuous line through the numbers or served or simply writing a total number, no numbers hashed or circled, is not acceptable.

# Example of Incorrectly Completed Daily Meal Count Sheet 1

## Daily Meal Count Form

Site Name: <u>Parker Playground</u>	Meal Type (circle): <u>(B)</u> L SN SU																																																																																																																																																																
Address: <u>116 Elm Street</u>	Telephone: <u>(802) 828-2020</u>																																																																																																																																																																
Supervisor's Name: <u>Eric Brown</u>	Delivery Time: <u>N/A</u> Date: <u>Week of April 19<sup>th</sup></u>																																																																																																																																																																
Meals received/prepared <u>30</u> + Meals available from previous day <u>5</u> = <u>35</u> (Total meals available) [1]																																																																																																																																																																	
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Total First Meals + <u>25</u> [2]																																																																																																																																																																	

“week of April 19th” is too broad, is that 5 days or 7 days?

# Example of Incorrectly Completed Daily Meal Count Sheet 2

**Daily Meal Count Form**

Site Name: <u>Maple Street Elementary</u>										Meal Type (circle): <input checked="" type="radio"/> B <input type="radio"/> L <input type="radio"/> SN <input type="radio"/> SU										
Address: <u>12 Maple Street</u>										Telephone: <u>(802) 828-2000</u>										
Supervisor's Name: <u>Megan Smith</u>										Delivery Time: <u>N/A</u> Date: <u>04/22/2021</u>										
Meals received/prepared <u>50</u>										+ Meals available from previous day <u>0</u> = <u>30</u> (Total meals available) [1]										
First Meals Served to Children (cross off number as each child receives a meal):																				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	
21	22	23	24	25	26	27	28	29	30	31	32	33	34	<input checked="" type="radio"/> 35	36	37	38	39	40	
41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	
61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	
81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	
101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	
121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	
141	142	143	144	145	146	147	148	149	150											
															Total First Meals + <u>35</u>					[2]
Second meals served to children:																				
1	2	3	4	<input checked="" type="radio"/> 5	6	7	8	9	10											
															Total Second Meals + <u>5</u>					[3]

Only the total number was circled, the individual numbers were not hashed

# Example of Incorrectly Completed Daily Meal Count Sheet 3

**Daily Meal Count Form**

Site Name: <u>Maple Street Elementary</u>		Meal Type (circle): <input checked="" type="radio"/> B <input type="radio"/> L SN SU																	
Address: <u>12 Maple Street</u>		Telephone: <u>(802) 828-2000</u>																	
Supervisor's Name: <u>Megan Smith</u>		Delivery Time: <u>N/A</u> Date: <u>04/22/2021</u>																	
Meals received/prepared <u>50</u> + Meals available from previous day <u>0</u> = <u>50</u> (Total meals available)			[1]																
First Meals Served to Children (cross off number as each child receives a meal):																			
<del>1</del>	<del>2</del>	<del>3</del>	<del>4</del>	<del>5</del>	<del>6</del>	<del>7</del>	<del>8</del>	<del>9</del>	<del>10</del>	<del>11</del>	<del>12</del>	<del>13</del>	<del>14</del>	<del>15</del>	<del>16</del>	<del>17</del>	<del>18</del>	<del>19</del>	<del>20</del>
<del>21</del>	<del>22</del>	<del>23</del>	<del>24</del>	<del>25</del>	<del>26</del>	<del>27</del>	<del>28</del>	<del>29</del>	<del>30</del>	<del>31</del>	<del>32</del>	<del>33</del>	<del>34</del>	<del>35</del>	<del>36</del>	<del>37</del>	<del>38</del>	<del>39</del>	<del>40</del>
<del>41</del>	<del>42</del>	<del>43</del>	<del>44</del>	<del>45</del>	<del>46</del>	<del>47</del>	<del>48</del>	<del>49</del>	<del>50</del>	<del>51</del>	<del>52</del>	<del>53</del>	<del>54</del>	<del>55</del>	<del>56</del>	<del>57</del>	<del>58</del>	<del>59</del>	<del>60</del>
<del>61</del>	<del>62</del>	<del>63</del>	<del>64</del>	<del>65</del>	<del>66</del>	<del>67</del>	<del>68</del>	<del>69</del>	<del>70</del>	<del>71</del>	<del>72</del>	<del>73</del>	<del>74</del>	<del>75</del>	<del>76</del>	<del>77</del>	<del>78</del>	<del>79</del>	<del>80</del>
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<del>101</del>	<del>102</del>	<del>103</del>	<del>104</del>	<del>105</del>	<del>106</del>	<del>107</del>	<del>108</del>	<del>109</del>	<del>110</del>	<del>111</del>	<del>112</del>	<del>113</del>	<del>114</del>	<del>115</del>	<del>116</del>	<del>117</del>	<del>118</del>	<del>119</del>	<del>120</del>
<del>121</del>	<del>122</del>	<del>123</del>	<del>124</del>	<del>125</del>	<del>126</del>	<del>127</del>	<del>128</del>	<del>129</del>	<del>130</del>	<del>131</del>	<del>132</del>	<del>133</del>	<del>134</del>	<del>135</del>	<del>136</del>	<del>137</del>	<del>138</del>	<del>139</del>	<del>140</del>
<del>141</del>	<del>142</del>	<del>143</del>	<del>144</del>	<del>145</del>	<del>146</del>	<del>147</del>	<del>148</del>	<del>149</del>	<del>150</del>										
Total First Meals +			<u>35</u>	[2]															
Second meals served to children:																			
<del>1</del>	<del>2</del>	<del>3</del>	<del>4</del>	<del>5</del>	<del>6</del>	<del>7</del>	<del>8</del>	<del>9</del>	<del>10</del>										
Total Second Meals +			<u>0</u>	[3]															

The numbers were lined through, the individual numbers were not hashed



# Example of Correctly Completed Daily Meal Count Sheet

## Daily Meal Count Form

Site Name: <u>Maple Street Elementary</u>	Meal Type (circle): <u>(B)</u> SN SU
Address: <u>12 Maple Street</u>	Telephone: <u>(802) - 828-2000</u>
Supervisor's Name: <u>Morgan Smith</u>	Delivery Time: <u>N/A</u> Date: <u>04/22/2021</u>
Meals received/prepared <u>50</u> + Meals available from previous day <u>0</u> = <u>50</u> (Total meals available) [1]	
First Meals Served to Children (cross off number as each child receives a meal):	
<del>1</del> <del>2</del> <del>3</del> <del>4</del> <del>5</del> <del>6</del> <del>7</del> <del>8</del> <del>9</del> <del>10</del> <del>11</del> <del>12</del> <del>13</del> <del>14</del> <del>15</del> <del>16</del> <del>17</del> <del>18</del> <del>19</del> <del>20</del> <del>21</del> <del>22</del> <del>23</del> <del>24</del> <del>25</del> <del>26</del> <del>27</del> <del>28</del> <del>29</del> <del>30</del> <del>31</del> <del>32</del> <del>33</del> <del>34</del> <del>35</del> 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150	
Total First Meals + <u>35</u> [2]	
Second meals served to children:	
<del>1</del> <del>2</del> <del>3</del> <del>4</del> <del>5</del> 6 7 8 9 10 Total Second Meals + <u>5</u> [3]	

The individual numbers are correctly hashed through

# Monthly Consolidated Meal Count Sheets

- Sites may use an Excel document or paper sheet to record and tally meals served for the month.
- Sites may also enter their daily meal counts into their electronic POS system to generate a report showing the meals served for the month.

# Adult Meals

- Meals served to adults are not eligible for reimbursement.
- However, these meals must be tracked and reported on the Claim for Reimbursement.
- Program Adult Meals are an allowable cost.
- Non-Program Adult Meal
  - Can cover the cost with other non-federal funds
  - Can sell meals to non-program adults. Must charge enough to cover the cost of the meal.
  - If you indicate in your Budget Detail that you are providing Non-Program Adult Meals, I will email you to ask how they are being paid for.

# USDA Foods

# USDA Foods Contact

Cheryl Rogers

Grants Specialist

(802)-828-1590

[cheryl.rogers@vermont.gov](mailto:cheryl.rogers@vermont.gov)

# USDA Foods in Summer 2021

- If you wish to order USDA foods, you must select this option in the Organization Application. Question 41. asks “Does this Sponsor wish to receive USDA Foods/Commodities? Check “Yes”.
- If you wish to receive DoD Fresh, you must inform the State agency that you are participating by April 29th, 2021.

# USDA Foods Allocation

- Food will be allocated in June. If you are a new, non-SFA sponsor you will have to set up an account with Reinhart.
- Allocation is based on meals served in the previous summer, if you are a new sponsor, this figure is estimated.
- If your Fair Share Allocation is more than \$100, you have the option to do DoD Fresh.

# USDA Foods Options

- If is less than \$100, you can receive sliced pears, turkey taco filling, chicken unseasoned strips, frozen blueberries, green beans, potato wedges, diced tomatoes, and tomato sauce.
- You can choose to accept or decline your allocation.
- For “brown box” there are storage and delivery fees.
- \$2.50 a case for storage, \$4.75 or \$75 per delivery, whichever is higher.
- Schools can combine their summer and school delivery.



# Meal Pattern

# Meal Pattern Waiver

- The USDA did not extend [COVID-19: Child Nutrition Response #63 Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option – Extension 8](#) past June 30, 2020.
- On 05/28/2021, USDA **denied** our state-specific waiver to allow sponsors to request to substitute alternate dairy products in place of milk for up to one meal service.

# Waiver to Allow OVS in SFSP

- On March 9, 2021, USDA extended the nationwide waiver to allow OVS with the SFSP meal pattern and for non-SFA sponsors, through September 30, 2021.
- [COVID-19: Child Nutrition Response #79 Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program for Summer 2021 Operations – EXTENSION 3](#)

# Meal Pattern Options for School Food Authority Sponsors

- SFA sponsors may choose to follow the SFSP meal pattern or continue following the school year NSLP, SBP, and NSLP Afterschool Snack Service meal patterns.
- In the Site Application, indicate this choice in question B5 for breakfast and L5 for lunch.
- SFSP Meal Pattern:  
<https://education.vermont.gov/documents/child-nutrition-sfsp-meal-pattern>

# SFSP vs. SNP Meal Pattern

Notable Differences	SNP	SFSP
Milk	Unflavored fat-free or 1% milk, flavored fat-free milk  Must offer milk choice	Plain or flavored whole milk, low-fat milk, skim milk, and buttermilk  No milk choice required
Grains	Must be whole grain-rich	Whole-grain or enriched, or cereals can be fortified
Grain-Based Desserts (GBD)	Up to 2 ounces of GBD at lunch per week	Only allowed at snack and breakfast
Meat/Meat Alternate (M/MA) at Lunch	Daily serving size depends on age/grade group	Always 2-ounce m/ma equivalent at lunch/supper
Vegetable Subgroups	Required	Not required
½ Cup Fruit or Vegetable with OVS	Required	Not required

# Larger Portions for 12 through 18

- Sponsors have the option to serve more than the minimum serving sizes
- There is no maximum serving size in the SFSP Meal Pattern
- Sponsors have the option to serve CACFP adult meal pattern portion sizes
- CACFP Adult Meal Pattern:  
<https://education.vermont.gov/student-support/nutrition/child-and-adult-care-food/adult-day-centers>
- Meals containing larger portion sizes are reimbursed the same amount as regular meals

# Smaller Portions for 6 and under

- Sponsors have the option to serve CACFP-size portions to children 6 and under
- To select this option, please add a note in the Application Packet requesting this.
- CACFP Child Meal Pattern: [https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_childmealpattern.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_childmealpattern.pdf)

# Family Style Meal Service

- Usually only allowed at camps and closed-enrolled sites
- During this time, it is not allowed per guidance from the Health Department found in [A Strong and Healthy Year: Food Services Guidance](#), “Meals should not be self-serve.”



# Serve or Offer vs. Serve (OVS)

## Serve

- All meal components must be taken.
- You can offer entrée choices within the 'Serve'.

## Offer vs. Serve (OVS)

- All meal components must be offered, but some can be declined.
- Offer vs. Serve (OVS) could be implemented through a pre-order system.

# Unitized Meals

- All meal components are packaged, delivered, and served as a unit. Milk may be packaged and provided separately, but must be served with the meal and only such complete meals are reimbursable.
- Sponsors contracting for meals must provide unitized meals or submit a Unitized Meal Requirement Waiver.
  - <https://education.vermont.gov/documents/SFSP-Unitized-Meal-Waiver>

# Delivery Receipts

- Vended programs which deliver meals must support the number of meals delivered with a signed delivery receipt
- Highly recommended for non-vended, satellite sites
- Delivery Receipt for Vended Satellite Meal Service: <https://education.vermont.gov/documents/edu-delivery-receipt-for-vended-satellite-meal-service>
- This is to support the proper amount of food was prepared and delivered as agreement in the FSMC contract or vendor agreement

# Bulk Meals

- Due to the congregate feeding waiver and meal service times restriction waiver, bulk items may be provided.
- Please see Serving Bulk Meals in the SFSP and CACFP At-Risk After School Meals During COVID-19:  
<https://education.vermont.gov/documents/serving-bulk-meals-in-the-sfsp-and-cacfp-at-risk-afterschool-meals-during-covid19>

# Bulk Meals

## Meal Pattern Considerations

Bulk items may be provided as long as individual meals are easily identifiable as reimbursable meals (SP 13-2020). To accomplish this, we recommend including a menu that identifies which items and quantities are to be used to make up each meal.

- Bulk meals must include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- Bulk meals must ensure that food items are clearly identifiable as making up reimbursable meals;
- You are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes;
- Consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Ensure that only minimal preparation is required, and that food is not provided as ingredients for recipes or meals that require chopping, mixing, baking, etc. (dried rice, pasta, beans, uncooked meat cannot be provided as components);
- You may consider distributing a larger carton/jug of milk, as long as the number of ounces adds up to at least 8oz per meal being distributed. For example, if 5 days' worth of breakfasts and lunches are being distributed at one time, the carton/jug of milk would need to contain at least 80oz of milk. Three quarts (32oz each), or one-half gallon (64oz) and one quart (32oz), or a whole gallon (128oz) would accomplish this.

# Bulk Meals

## Meal Pattern Considerations Continued

- Please provide food safety information with the meals, including refrigeration and freezing information, when to throw food away, and cooking instructions including cook temperatures, if necessary.
- For a suggested menu, sample communications to households, and additional food quality and food safety information, please see this tip sheet from [USDA: Summer Food Service Program: Providing Multiple Meals at a Time During the Coronavirus \(COVID-19\) Pandemic.](#)

# Bulk Meal Distribution

- A pre-order system does help with planning when preparing bulk meals. Households may be strongly encouraged to use a pre-order system. However, please remember if the site is an open site, all eligible individuals who show-up, even without pre-ordering, must be provided meals. The suggestions below are based on seven days of operation and are not exhaustive. They meant to serve as an example of the different options available.

# Bulk Meal Distribution Continued

1. If the site has children in on-site programming five days per week, the site needs to provide prepared meals on-site five days per week, but may also provide grab and go meals or two days' worth of bulk meals for weekend meals.
2. If the site is fully non-congregate, these students and other children could be provided seven days' worth of meals at one time.
3. If the site is following a hybrid schedule of two days in-person and three days remote, the site can provide bulk meals for five days. These meals would cover the three remote learning days and weekend meals. Prepared meals would need to be provided on-site to children in on-site programming.
4. Open sites can provide community children, such as siblings or homeschooled children, with up to seven days' worth of meals at one time.
5. A site could provide any combination of the scenarios referenced above.

Sites may also provide households the option of choosing unitized meals or bulk meals.



# Meal Pattern Components

- Milk
- Vegetables and/or Fruit
  - Juice must be 100%
- Grains
  - Whole-grain or enriched, or cereals can be fortified.
- Meat/Meat Alternate (M/MA)
  - Nuts and seeds may fulfill the whole component requirement for snack, but no more than ½ of the requirement for lunch/supper.

# Milk

- The serving size of milk is always 8 ounces.
- No fat-content restrictions.
- Milk can be flavored or unflavored.
- Milk must be offered at breakfast, lunch, and supper. If operating OVS, children may decline the milk.
- No milk choice requirements, as is required in the school year.

# Unavailability of Milk

- Per 7 CFR 225.16(f)(6) if emergency situations prevent a sponsor from receiving a sufficient supply of milk, the State agency may approve the service of meals without milk during that time.

# Breakfast

- **Milk**- 8 ounces/1 cup
- **Vegetables and/or Fruit** - ½ cup
- **Grains**- 1 ounce
  - 1 ounce grain of bread is a 28-gram slice
- **Meat/Meat Alternate** is optional at breakfast
  - meat, fish, cheese: 1 ounce
  - nut butters: 1 ounce/2 tablespoons

# OVS at Breakfast

- A minimum of four required food items must be offered.
- Three must be from the required components (fruit/vegetable, milk, grain).
- The fourth may be a different item from the fruit/vegetable or grain components or a meat/meat alternate.
- Children must select three of the four required food items to have a reimbursable meal. The three items must be different.

# “Different”

Unlike the School Breakfast Program...

- A large item cannot count as two
- Two pieces of toast are not two items
- At breakfast and lunch/supper: apple juice and apples are not different

# Lunch/Supper

- **Milk-** 8 ounces/1 cup
- **Vegetables and/or Fruit:**  
3/4 cup total, 1/8 is minimum serving size
  - 1 vegetable and a different vegetable
  - 1 fruit and a different fruit
  - fruit and vegetable
- up to 1/2 of the total requirement may be met with 100% juice

# Salad

- Fruit salad only counts as 1 fruit
- Garden salad only counts as 1 vegetable



# Grains at Lunch and Supper

- Bread – 1 ounce/ 28 grams slice
- Tortillas – 1 ounce/28 grams
- Pasta or rice-  $\frac{1}{2}$  cup

# Meat/Meat Alternate at Lunch and Supper

- Meat, poultry, fish, cheese- 2 ounces
- Eggs – 1 large egg
- Nut Butters – 4 Tablespoons; this is **a lot** of nut butter, often folks will offer a cheese stick too!
- Yogurt – 8 ounces/1 cup
- Tofu does not credit in SFSP

Remember, it is always 2 ounces of m/ma at lunch/supper!

# OVS at Lunch/Supper

- Must offer 5 items from the 4 components
- Must select 3 components for a reimbursable meal.
- For example, if the child is offered a turkey sandwich, watermelon, carrot sticks, and milk and they choose watermelon, carrot sticks, and milk, this is not a reimbursable meal because watermelon and carrots sticks are from the same component. If they choose the sandwich and the milk, they have a reimbursable meal because they have the m/ma from the turkey, the grain from the sandwich, and the milk.

# Snack – Two Different Components

- **Milk** – 8 ounces/1 cup
- **Vegetable and/or Fruit** –  $\frac{3}{4}$  cup
- **Grains**
  - Bread: 28 grams slice is 1 ounce
  - Cereal: 1 ounce
- **Meat/Meat Alternate**
  - Meat and cheese- 1 ounce
  - Nut butter – 2 tablespoons
  - Nuts- 1 ounce
  - Yogurt- 4 ounces/  $\frac{1}{2}$  cup

# Snack

- Snack cannot be just a milk and juice
- This is a “liquid” snack and kids need something more substantial
- No OVS at snack.

# Grain-Based Desserts (GBD)

- Defined by the 3 and 4 subscripts on the Grain Crediting Chart
  - <https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/ExhibitA.pdf>
- Includes foods like pies, cookies, and cakes
- Are only allowed at snacks and breakfasts
- Not allowed at lunch and supper

# Additional Foods

- Foods that may not be served as part of the reimbursable meal are not allowable costs.
- Condiments served with a creditable food are exempt from this restriction.
- Sites wishing to serve additional foods, that do not meet SFSP meal pattern standards, must use non-Program funds.

# Chips

- Pretzels and chips made from wholegrain or enriched meal or flour can be used to meet the grain requirement.
- Chips, such as potato chips, that do not meet the meal pattern requirements cannot be purchased with SFSP funds.



# Crediting

- Dried fruit and raw leafy greens credit as is.
- $\frac{1}{4}$  cup of dried fruit =  $\frac{1}{4}$  cup of fruit
- $\frac{1}{2}$  cup of raw leafy greens =  $\frac{1}{2}$  cup of vegetable

# Crediting Resources

- Food Buying Guide

<https://foodbuyingguide.fns.usda.gov/>

- Using the Food Buying Guide in CNP

<https://register.gotowebinar.com/register/839388479465925901>

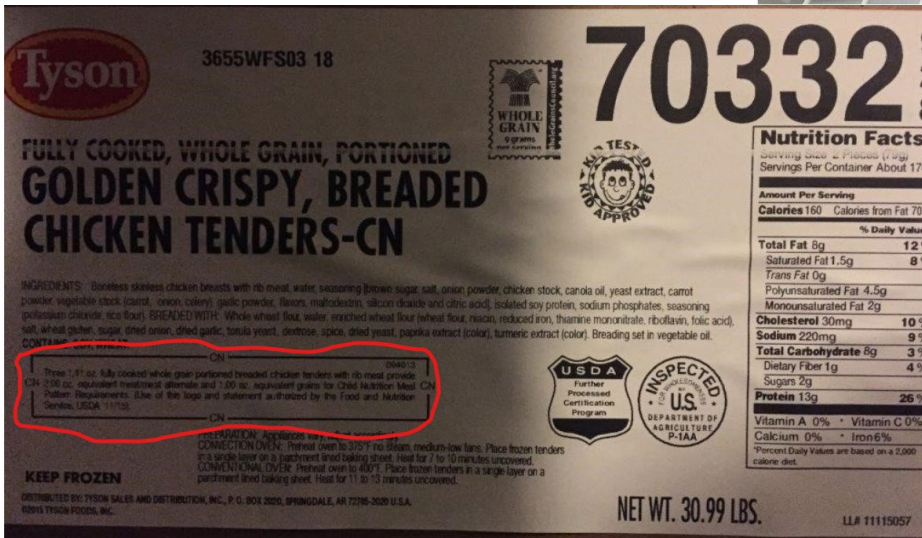
- Exhibit A: Grain Requirements for Child Nutrition Programs

<https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/ExhibitA.pdf>

# Meal Pattern Documentation

- Production Records are highly recommended, but not required
- Use standardized recipes
- Use products with Child Nutrition (CN) labels or Product Formulation Statements (PFS) as appropriate
  - The USDA maintains a [CN Label Verification Report](#) which is a list of CN-labeled products.
- Receipts and invoices

# Examples of CN-Labels



# Examples of Product Formulation Statements

## Tyson Product Formulation Statement

Product Name: FC, Whole Grain Breaded CKN Breast Chunk-Shaped Patties-with RMT Code No: 002378-0928  
 Manufacturer: Tyson Foods, INC Case/Pack/Count/Portion Size: / 250 / 5 (0.69 oz.) Chunk

I. Meat/Meat Alternate  
 Please fill out the chart below to determine the creditable amount of Meat/Meat Alternate

	Description of Food Buying Guide	Ounces per Raw Portion of Creditable Ingredient	Multiply	FBG Yield	Creditable Amount*
Chickens	BONELESS CHICKEN W/SKIN IN NATURAL PROPORTION	0.3862820	X	0.70	0.27039740
<b>Total</b>					0.27039740

\* Creditable Amount - Multiply ounces per raw portion of creditable ingredient by the FBG Yield Information

II. Alternate Protein Product (APP)  
 If the product contains APP please fill out the chart below to determine the creditable amount of APP. If APP is used, you must provide documentation as described in Attachment A for each APP used.

	Description of APP, Manufacturer's name, and Code Number	Soy Type	Ounces Dry APP Per Portion	Multiply	% of Protein As-Is*	Divide by 18**	Creditable Amount APP***
APP	PROFAM 981, ADM	Isolate	0.027352	X	96	- by 18	0.1306817
<b>Total Creditable APP Amount</b>							0.1306817

\* Percent of Protein As-Is is provided on the attached APP documentation.

\*\* 18 is the percent of protein when fully hydrated.

\*\*\* Creditable amount of APP equals ounces of Dry APP multiplied by the percent of protein as-is divided by 18.

Total Creditable Amount may be rounded down to the nearest 0.25oz (1/4) would round down to 1.25 oz meat equivalent). Do not round up. If you are crediting MMA and APP, you do not need to round down in box A (Total Creditable MMA Amount) until after you have added the Total Creditable APP Amount from box B to box C.

Total weight (per portion) of product as purchased 3.45 oz.  
 Total creditable amount of product (per portion) 2.00 oz.

(Reminder: Total creditable amount cannot count for more than the total weight of product.)

I certify that the above information is true and correct and that a 2.45 ounce serving of the above product (ready for serving) contains 2.00 ounces of equivalent meat/meat alternate when prepared according to directions.

I further certify that any APP used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 210, 220, 225, 226, Appendix A) as determined by the attached supplier documentation.

Karen Shank, MS, RD/N  
 Signature Title  
 Karen Shank, MS, RD/N 7/7/2016 (479) 290-3659  
 Printed Name Date Phone Number

## Formulation Statement for Documenting Grains in School

Product Name: FC, Whole Grain Breaded CKN Breast Chunk-Shaped Patties-with RMT Code No: 002378-0928  
 Manufacturer: Tyson Foods, INC Case/Pack/Count/Portion Size: / 250 / 5 (0.69 oz.) Chunk

I. Does the product meet the Whole Grain-Rich Criteria?: Yes  No   
 (Refer to SP 39-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program)

II. Does the product contain non-creditable grains?: Yes  No  How many grams: 0.31 g

III. Use Policy Memorandum SP 39-2012 Grain Requirements for the National School Lunch Program and School Breakfast Program: Exhibit A to determine if the product fits into Groups A-G, Group H or Group I. (Please be aware that different methodologies are applied to calculate servings of grain component based on creditable grains. Groups A-G use the standard of 16 grams creditable grain per oz eq. Group H uses the standard of 38 grams creditable grain per oz eq, and Group I is reported by volume or weight). Indicate which Exhibit A Group (A-I) the Product Belongs: \_\_\_\_\_

	Description of Food Buying Guide	Portion Size of Product as Purchased	Weight of one ounce equivalent as listed in SP 39-2012	Creditable Amount*
Grains	BATTER TYPE COATING	1.00	1.00	1.00
<b>Total Creditable Amount</b>				1.0000000

\* Creditable Amount = (Exhibit A weight for one oz eq)

\*\* Total Creditable Amount must be rounded down to the nearest quarter (0.25) oz eq. Do not round up.

Total weight (per portion) of product as purchased 3.45 oz.  
 Total creditable amount of product (per portion) 1.00 oz.

I further certify that the above information is true and correct and that a 2.45 ounce portion of this product (ready for serving) provides 1.00 oz equivalent Grains. I further certify that non-creditable grains are not above the 0.34 oz eq, per portion.

Karen Shank, MS, RD/N  
 Signature Title  
 Karen Shank, MS, RD/N 7/7/2016 (479) 290-3659  
 Printed Name Date Phone Number

RFS# L3494 This is a Child Nutrition equivalent statement. This item does not have a Child Nutrition label.



## Product Formulation Statement (Product Analysis) for Meat/Meat Alternate (MMA) Products

Product Name: GC RED SOD OR TKY BRST Code No.: 831702

Manufacturer: Jennie-O Turkey Store Case/Pack/Count/Portion/Size: 2/7-9 LB

I. Meat/Meat Alternate

Please fill out the chart below to determine the creditable amount of Meat/Meat Alternate

Description of Creditable Ingredients per Food Buying Guide	Ounces per Raw Portion of Creditable Ingredient	Multiply	Food Buying Guide Yield	Creditable Amount*
Turkey Boneless Fresh or Frozen w/ Skin in Natural Proportions	2.8834	X	70%	2.0044
		X		

A. Total Creditable Amount†

† Creditable Amount - Multiply ounces per raw portion of creditable ingredient by the Food Buying Guide yield.

II. Alternate Protein Product (APP)

If the product contains APP please fill out the chart below to determine the creditable amount of APP. If APP is used, you must provide documentation as described in Attachment A for each APP used.

Description of APP, manufacturer's name, and code number	Ounces Dry APP Per Portion	Multiply	% of Protein As-Is*	Divide by 18**	Creditable Amount APP***
		X		- by 18	

B. Total Creditable Amount†

C. TOTAL CREDITABLE AMOUNT (A + B rounded down to nearest 1/4 oz)

\* Percent of Protein As-Is is provided on the attached APP documentation.

\*\* 18 is the percent of protein when fully hydrated.

\*\*\* Creditable amount of APP equals ounces of Dry APP multiplied by the percent of protein as-is divided by 18.

Total Creditable Amount must be rounded down to the nearest 0.25oz (1/4) would round down to 1.25 oz meat equivalent). Do not round up. If you are crediting both MMA and APP, you do not need to round down in box A until after you have added the creditable APP amount from box B.

Total weight (per portion) of product as purchased 2.98 oz.

Total creditable amount of product (per portion) 2.00 oz.

(Reminder: Total creditable amount cannot count for more than the total weight of product)

I certify that the above information is true and correct and that a 2.98 ounce serving of the above product (ready for serving) contains 2.00 ounces of equivalent meat/meat alternate when prepared according to directions.

I further certify that any APP used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 210, 220, 225, 226, Appendix A) as demonstrated by the attached supplier documentation.

Chad Randick  
 Signature Title  
 Chad Randick 7-1-16 800-328-1756  
 Printed Name Date Phone Number

Jennie-O Turkey Store Sales, LLC  
 2505 Willmar Avenue SW Willmar, MN 56201 (320) 235-2622

# Leftovers

- All sponsors must plan, prepare, and order meals with the objective of providing one meal per child at each meal service.
- Sponsors should regularly monitor and compare site reports on the number of attending children and the number of delivered meals to reduce waste and cost.
- Additionally, all alternatives permitted by Program regulations and State and local health and sanitation codes should be exhausted before discarding food.
- When it is not feasible to reuse leftovers or store food, FNS encourages sponsors to consider donating it to non-profit organizations working to address hunger in the community, such as homeless shelters, food banks, and food pantries. The Bill Emerson Good Samaritan Food Donation Act protects donations to non-profit organizations. These meals cannot be claimed for reimbursement.

# Inventory

- Sponsors must conduct inventory of food and non-food supplies at the beginning and end of operation
  - If SFAs did not take inventory at the beginning of the School Year, please do so at the end of School Year operation.
  - It must include a list of the items and assigned values
- Sponsors with fixed-price FSMC contracts do not have to conduct inventory as such, but should manage the contract by ensuring other assets owned by the sponsor are accounted for

# Food at the End of School and End of Summer

Food leftover at the end of SFSP operation may be put toward operation of other Child Nutrition Programs or given to registered 501(c)(3) organizations, like food shelves.



# Food Safety and Sanitation

# Health Department Notification Waiver

On December 23<sup>rd</sup>, 2020 USDA approved an extension of Vermont's waiver to allow the State agency to notify the Health Department of program operation on behalf of sponsors until September 30<sup>th</sup>, 2021.

# Health Department Notification in the Checklist Summary

- If you did not operate SFSP in School Year 2020-2021, upload the “Mock Health Department Letter Summer 2021”, <https://education.vermont.gov/sites/aoe/files/documents/edu-mock-health-department-letter-summer-2021>, to the Checklist Summary section.
- If you operated SFSP in School Year 2020-2021 and you already have “Mock Health Department Letter Fall 2020” uploaded, you do not need to replace it.

# Follow State and Local Health Standards

- Must meet applicable State and local health standards during all aspects of food receiving, storage, and preparation, service of meals, and the handling of leftovers.
  - Vermont Food Code:  
[https://www.healthvermont.gov/sites/default/files/documents/2016/12/REG\\_food-service-establishments.pdf](https://www.healthvermont.gov/sites/default/files/documents/2016/12/REG_food-service-establishments.pdf)

# Health and Safety Training

- VOSHA Training on COVID-19 Health and Safety Requirements: <https://labor.vermont.gov/VOSHA>
- Foodservice Employee Training Videos from the Iowa State University Extension and Outreach: <https://www.extension.iastate.edu/foodsafety/foodservice-employee-training>
- Institute of Child Nutrition Food Safety for Summer Meals: <https://theicn.org/icn-resources-a-z/foodsafety-for-summermeals/>

# Sanitation

- Have a plan for trash removal and composting
- Use gloves while preparing meals and/or serving utensils, such as tongs to serve meals
- Wear proper hair restraints while preparing and serving meals
- Be temperature aware.
  - Keep cold food COLD and hot food HOT.
  - Map your routes carefully. Take the temperature of food when it leaves and the temperature again when it arrives.

# Keeping it Cold or Hot

- With coolers, use enough ice packs to keep the food cold. Put food right back in coolers after meal service. Don't take everything out of the coolers until it is needed. Leave the lid closed during service.
- Clean out your coolers regularly. Think of them as any other utensil that you would wash.
- Use warmers, restaurant heating bags, and do not open them unnecessarily.

# Temperatures

- Monitor and record temperatures for:
- all cold storage units, including walk-in refrigerators, walk-in freezers, chest freezers, milk coolers, and standing refrigerators
- Dishwashers
- Cooked foods, at least after cook, start of service and end of service recommended



# HACCP-Based SOPs

For schools and others that have such procedures:

- In general, it is recommended that the HACCP-based Standard Operating Procedures (SOPs) are periodically assessed to ensure they reflect actual safe practices used in Child Nutrition Program operation
- Particularly during COVID, when additional steps are in place to ensure safety and sanitation, it is a good idea to document these processes. This is helpful for staff and substitutes to reference and for consistency. Some SFAs pick one SOP a month and review it as a group. The Institute of Child Nutrition has template [HACCP-Based Standard Operating Procedures](#). They also have a number of other [Food Safety Resources](#).

# Procurement

# Procurement Questions

At this time, please direct procurement questions to:

Rosie Krueger

State Director of Child Nutrition Programs

[mary.krueger@vermont.gov](mailto:mary.krueger@vermont.gov)

(802) 828-1589

# Methods of Procurement

- Micro-Purchase: under \$10,000
  - spread out equitably
- Small-Purchase: under \$250,000
  - “Three Bids and a Buy”
- Formal Procurement: above \$250,000
  - Request for Proposal (RFP)

# Written Procurement Procedures

- Sponsors must have a written procurement plan on how to handle purchasing, outlining the applicable method of procurement.
- The procurement plan must include Conflicts of Interest and Codes of Conduct.

# Buy American Provision

- Not required in SFSP unless you also operate NSLP, so SFA sponsors must follow it.
- SFAs must, to the maximum extent practicable, purchase domestic commodities or products.
- This promotes the dual nature of the programs, which is to provide children with healthy meals and to support American agriculture.

# Buy American Continued

- **“Domestic”** is a product produced in the United States and is processed in the United States substantially using agricultural commodities that are produced in the United States. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as US territories.
- **“Substantially”** means that over 51% of the final processed product consists of agricultural commodities that were grown domestically. The provision should be included in bid specifications to ensure compliance.

# Buy American Provision Exceptions

There are two exceptions which allow the purchase of foreign products.

- **Availability:** when the product is not produced or manufactured in the U.S. in sufficient and reasonable available quantities of a satisfactory quality.
  - Example: There are no domestic bananas available. You may continue to serve foreign bananas.
- **Cost:** the cost of a U.S. product is significantly higher than the cost of a comparable foreign product. “Significantly” is not federally defined, but it is a best practice that it be defined by the SFA within its required written procurement procedures.
- Buy American Provision Exception Sheet  
<https://education.vermont.gov/documents/BuyAmericanProvisionExceptionSheet>



# Minority Businesses

- Use the Small Business Administration and the Office of Minority Business Enterprise of the Department of Commerce as required. (7 CFR Part 225.17(d) )
- Vermont Agency of Administration: Buildings and General Services maintains a list:
  - <http://bgs.vermont.gov/facilities/forms/minority-women>
- Include these businesses on solicitation lists,
- Solicit these businesses whenever they are potential sources,
- Divide requirements into smaller tasks/quantities for maximum participation, when feasible, and
- Establish schedules to assist them with meeting deadlines.

# Training

# Sponsor Training

- At least one representative from the sponsor organization must participate in the annual required sponsor training from the State agency.
- FSMC employees are welcome, but cannot count as the sponsor representative.
- This annual training is being recorded to view at an alternative time.
- Must ensure everyone else involved in the program receives SFSP training and Civil Rights training.

# Training for Sponsors that operated in School Year 2020-2021

- If you operated in School Year 2020-2021 and are continuing to operate in Summer 2021, any staff involved the program that already received training for the School-Year, do not need to be re-trained. Ensure you communicate any new information presented in this training or if folks need a refresher on any topics. Ensure any new staff receive training.

# Application Packet – Sponsor Training

- In the Organization Application of the SFSP Application Packet, the sponsor must indicate someone has received training, either by checking off “This person attended current program year’s state training” and the date completed or
- In the Training Attendance section of the Organization Application
- Please put the date you watched or read through this training and call it Summer Meals Training Summer 2021.

# Sponsor Staff Training

- Sponsors must provide training for anyone involved in any program operations
- Training must include:
  - Program Overview for all employees/volunteers
  - Meal Pattern Requirements for employees/volunteers preparing meals
  - Point of Service (POS) meal counting for employees/volunteers responsible for the meal count
  - Food Safety and Sanitation for all employees/volunteers
  - Civil Rights for all employees/volunteers (if already taken for this calendar year, do not need to take again)  
<https://education.vermont.gov/documents/vermont-child-nutrition-civil-rights-training-powerpoint>
  - Program Monitors must understand all requirements
  - Logistical information and sponsor specifics
- Staff training must be documented
  - This can be accomplished with sign-in sheets or certificates

# Training Resources

- Use this “Summer Meals Training Summer 2021”, <https://education.vermont.gov/documents/edu-CNP-sfsp-summer-meals-training-summer-2021>
- In Administrative Guide for SFSP Sponsors [https://fns-prod.azureedge.net/sites/default/files/sfsp/SFSP\\_Admin\\_Guide\\_Sept2016.pdf](https://fns-prod.azureedge.net/sites/default/files/sfsp/SFSP_Admin_Guide_Sept2016.pdf)
  - “Training Checklist for Administrative Staff” on page 175
  - “Training Checklist for Site Staff” on page 177

# Application Packet – Staff Training

- In the Training Sessions section of the Application –
  - Questions 37-39, of the Organization Application of the SFSP Application Packet you will indicate who will be responsible for training all other staff involved in the program and when this will take place.



# Sponsor Monitoring

# Waiver of Onsite Monitoring Requirements for SFSP Sponsors

- On August 4, 2020, the USDA extended the nationwide waiver of onsite monitoring requirements for SFSP sponsors, through September 30, 2021.
- [COVID-19: Child Nutrition Response #42 Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program- EXTENSION 2](#)

# Required Sponsor Monitoring

- Monitoring must be conducted by a sponsor-level representative and cannot be an FSMC employee.
- Pre-Operational Review: prior to site operation for all new sites or problem sites
- Pre-Operational Review Form Summer 2021: <https://education.vermont.gov/documents/edu-SFSP-Pre-Operational-Review-Form-Summer-2021>

# First Week Review

- Per [COVID-19: Child Nutrition Response #81 Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program 2021 Operations- EXTENSION 3](#), released on March 9<sup>th</sup>, 2021, expires on September 30<sup>th</sup>, 2021 waives the first week review requirement for sites that have operated successfully in the previous year and sponsors that successfully participate in the Child and Adult Care Food Program (CACFP) or the National School Lunch Program (NSLP)
- SFSP First Week Review Summer 2021:  
<https://education.vermont.gov/documents/edu-SFSP-first-week-review-form-summer-2021>

# Definition of a New Site in 2021

- Per [COVID-19: Child Nutrition Response #83 Nationwide Waiver to Allow Sponsors that Successfully Participated in the Summer Food Service Program in Fiscal Year 2019 to Operate as Experienced Sponsors in Fiscal Year 2021](#) and [COVID-19: Child Nutrition Response #81 Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program 2021 Operations- EXTENSION 3](#) sites that operated in good standing in 2019, but did not operate in 2020 due to COVID-19, may operate in 2021 as experienced sites. Therefore, sponsors do not need to conduct pre-approval reviews or first week reviews for those sites.

# Site Review

- If a site already received a Site Review in School Year 2020-2021, you do not need to conduct another one during summer 2021 operation.
- For sites that did not operate in School Year 2020-2021, the Site Review Form must be completed within the first 4 weeks of operation.
- SFSP Site Review Form Summer 2021:  
<https://education.vermont.gov/documents/edu-sfsp-site-review-form-summer-2021>

# Racial and Ethnic Data Form

On May 17<sup>th</sup>, 2021, USDA released [CACFP 11-2021, SFSP 07-2021 Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Recission](#)

Racial and Ethnic Data is no longer to be collected by visual observation.

# Racial and Ethnic Data Collection

For SFA sponsors:

Please use the data that is collected by the registrar of the SFA when students enroll in school.

For non-profit organization sponsors:

The State agency will provide the information from the local SFA.



# Administrative Reviews

# Waiver of Onsite Monitoring Requirements for State Agencies

- On August 4, 2020, the USDA extended the nationwide waiver of onsite monitoring requirements for State agencies, through September 30, 2021.
- [COVID-19: Child Nutrition Response #43 Nationwide Waiver of Onsite Monitoring Requirements for State Agencies in the Summer Food Service Program – EXTENSION 2](#)

# Administrative Reviews in Summer 2021

- Per the State agency's Monitoring Plan in Program Year 2021, off-site Administrative Reviews/paperwork audits will be conducted for new sponsors, sponsors who experienced significant problems in summer 2020, and sponsors up for their 3-year review.
- Paperwork will be reviewed for all sites.
- SFSP Administrative Review Desk Audit Overview Summer 2021:  
<https://education.vermont.gov/documents/education-nutrition-sfsp-administrative-review-desk-audit-overview-summer-2021>

# Paperwork Reviewed 1

- Inventory
- Site eligibility documentation for camps
- Menu
- Production records (highly recommended, but not required in summer), recipes, CN-Labels and Product Formulation Statements (PFS)
- Invoices/receipts/documentation of food costs
- Daily Meal Count sheets
- Monthly Consolidated Meal Counts used for claims for reimbursement
- Delivery receipts for vended sites

# Paperwork Reviewed 2

- Press release
- Pre-operational review form (if applicable)
- First week review form (if applicable)
- Ethnic and Racial Data Form
- Site Review/“4 week” Review Form
- Documentation of staff training
- Employee time attributed to the program
- Relevant procurement documents
- Information provided with non-congregate meals (if applicable)

# Paperwork Reviewed 3

- Civil Rights Complaint Procedure
- Picture of the JFA poster at the Sponsor's office
- Picture of the JFA poster at the selected site
- Copy of most recent Health Inspection Report (if applicable) and picture of it posted
- Pictures of cold and dry storage
- Copies of cold storage, hot food, and dishwasher temperatures
- Pictures of meal service set-up and production kitchen staff
- Description of meal service, including meal counting procedure and food safety and sanitation measures
- Additional information requested if meals prepared at production kitchen

# Common Review Findings

- Lack of training and documentation of the training
- Not updating Site Application to reflect actual operation
- Non-discrimination information missing
- Mandatory press release not completed
- Insufficient meat/meat alternate (M/MA) amount
- Required reviews not completed and/or thoroughly documented
- Food safety and sanitation violations
- Meal count sheets not filled out thoroughly or completely

# Meal Disallowances

- Missing and/or inadequate components
- Non-unitized (without waiver)
- Served to adults, but included in count of reimbursable meals
- Meal count documentation does not support Claim for Reimbursement



# Review Report & Corrective Action

- After the review, you will receive a write up of the findings and the expected corrective action and documentation to submit, if applicable.
- Once any applicable corrective action has been submitted and assessed, you will receive a closure email.

# Serious Deficiency (SD) Procedure

# Serious Deficiency Findings

- Discovered during an administrative review, serious deficiency findings are egregious errors that rise above standard findings.

# Serious Deficiency (SD) Process

- SFSP Serious Deficiency Procedure  
<https://education.vermont.gov/documents/edu-nutrition-sfsp-serious-deficiency-procedure>

# Serious Deficiency Sponsor Findings

- Sponsor is not in compliance with applicable bid procedures and contract requirements.
- Submission of false information to AOE.
- Failure to return advance payments in excess of claims for reimbursement.
- A significant portion of the sponsor's sites have program violations including:

# Serious Deficiency Site Findings

- noncompliance with approved meal service time restrictions set forth in 7 CFR 225.16(c);
- failure to maintain adequate records;
- failure to adjust meal orders to conform to variations in the number of participating children;
- simultaneous service of more than one meal to any child;
- claiming of program payments for meals not served to participating children;
- service of a significant number of meals that did not include the required quantities of all meal components;
- continued use of food service management companies that are in violation of health codes.

# Serious Deficiency Findings Continued

- Noncompliance with the requirements in 7 CFR 225.14(c), demonstrating financial and administrative capability and responsibility.
- Imminent threat to the health and safety of participating children.
- Noncompliance with the requirements found in 7 CFR 225.14(d) *Requirements specific to sponsor types.*

# Imminent Threat to Health or Safety

- We will immediately terminate the participation of a site if during a review the health or safety of the participating children is imminently threatened



# Serious Deficiency Notice

- If a finding has risen to the level of serious deficiency, this will be indicated in the Review Report provided to the sponsor after the Administrative Review.
- This will include the necessary corrective action and allotted time frame for completion.
- Serious Deficiency Corrective Action is due within 10 calendar days after the report is sent.

# Termination

- If required corrective action is not completed correctly and within the allotted timeframe, a termination notice will be issued.
- This could be for the sponsor or site, depending.

# Appeals

- Sponsors and sites may appeal termination, except in the case of imminent threat to health and safety of participating children.
- Outside of SD process, sponsors and sites may appeal denial of program participation and other findings, including fiscal action.

# SFSP Appeals Process

- SFSP Appeals Process is available on SFSP webpage
  - <https://education.vermont.gov/documents/SFSP-Appeals-Process-Memo>

# Civil Rights

# Civil Rights Training

- Everyone involved in program operation and administration must receive Civil Rights training
- This can be accomplished through the Vermont Child Nutrition Programs Civil Rights Training PowerPoint:  
<https://education.vermont.gov/documents/vermont-child-nutrition-civil-rights-training-powerpoint> or the Child Nutrition Programs Civil Rights Training Recorded Webinar:  
<https://www.youtube.com/watch?app=desktop&v=oUNcOq7dQrI>
- Document with names, dates, and signatures

# Civil Rights Topics to Cover

- Collection and Use of Data
- Effective Public Notification Systems
- Complaint Procedures
- Compliance Review Techniques
- Resolution of Noncompliance
- Requirements for Reasonable Modifications to Accommodate Disabilities, including Meal Modifications
- Requirements for Language Assistance
- Conflict Resolution
- Customer Service

# Federally-Protected Bases

1. Race
2. Color
3. National Origin
4. Sex
5. Age
6. Disability



# Vermont Agency of Education

## Protected Bases

- Includes all federal bases and:
  1. Religion
  2. Sexual Orientation
  3. Gender Identity
  4. Marital/Civil Union Status

# Collection and Use of Data

- All income application information is confidential
- Information can be shared with other sponsors; food service directors can share eligibility information with Summer Meals sponsors
- Can share aggregated data, like percentages, with the public

# Effective Public Notification System

- Press Release
- Website
- “And Justice for All” non-discrimination poster
- Complaint Procedure

# Press Release

- The press release is mandatory for every single sponsor.
- It must be sent out before program operation to a media outlet such as a local newspaper, television or radio station, or city government website.
- It must include the full non-discrimination information. If a publication does not run your press release or does not include the non-discrimination information that is fine, but there must be documentation that efforts were made to do so.
- It is also recommended that the program be promoted on program websites and social media.

# Press Release for Open Sites vs. others

- For all sites, the point of the press release is to notify the public you are receiving federal funds and with that comes certain civil rights requirements, including the requirement to not discriminate against protected bases and the information on how to file a complaint of discrimination.
- The press release for open sites also serves as an advertisement to the community of the availability of meals for all children, 18 and under.

# Template Press Releases

- Template Media Release documents are available on our SFSP webpage
  - Template Media Release for Closed Enrolled Sites and Camps: <https://education.vermont.gov/documents/template-news-release-closed-enrolled-sites>
  - Template Media Release for Closed Enrolled Sites in Area Eligible Locations:  
<https://education.vermont.gov/documents/edu-nutrition-template-media-release-for-closed-enrolled-sites-in-area-eligible-locations>
  - Template Media Release for Open Sites:  
<https://education.vermont.gov/documents/template-news-release-open-sites>
- If a sponsor operates multiple types of sites, must submit multiple press releases

# Press Release and Sponsors that operated during School Year 2020-2021

- If you operated SFSP in School Year 2020-2021 and you are continuing operation in Summer 2021, you do not need to send out a formal press release, but you are expected to advertise your sites, especially your open sites.

# Application Packet – Press Release

- Please upload the actual Press/Media Release that will be sent out to the Checklist Summary
- In questions 51 & 52 of the Site Application, indicate Advertisement Date and Advertisement Method



# Program Webpage

- Webpages must contain the non-discrimination statement or the direct hyperlink.
  - include it on site and sponsor-level webpages
- The one exception would be if the meals program is not referenced in absolutely any way, but that is unlikely and not recommended, as websites are a great way to promote the program and increase participation.
- [USDA Non-Discrimination Statement \(English\)](#)
- [USDA Non-Discrimination Statement \(Spanish\)](#)

# Short Non-Discrimination Statement

- The press release and any free and reduced-price meal applications must be sent out with the complete non-discrimination statement.
- All other program materials, including flyers, calendar menus, signs, and informational statements accompanying meals are required to have the short non-discrimination statement:  
“This institution is an equal opportunity provider.”
- This statement must be no smaller than the smallest font used throughout the rest of the document.

# “And Justice for All” (AJFA) Poster

- Prominently display the official, no local reproduction is allowed, “And Justice for All” non-discrimination poster at the sponsor office, all sites, and field trip locations where meals are consumed (this can be accomplished by taping it to a cooler).

# AJFA Poster and Delivery

- Per USDA FNS Guidance Memo SP 14-2020, CACFP 08-2020, SFSP 07-2020 Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3
  - <https://fns-prod.azureedge.net/sites/default/files/resource-files/SP14-2020s-a.pdf>
- Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door drop deliveries at homes, the AJFA poster does not need to be displayed.

# AJFA Posters in the School Building

- Per question 6 of [SP 24-2020, CACFP 13-2020, SFSP 13-2020 Questions and Answers for the Child Nutrition Programs during School Year 2020-2021- #5](#)
- AJFA posters are not required in each classroom.
- Schools can display posters in prominent locations throughout the school, such as a bulletin board in the main building entrance or the school office.

# Ordering Non-Discrimination Posters

This is a picture of the required poster.

To get posters, please contact  
Ailynne Adams at  
(802)-828-1626 or  
[Ailynne.adams@Vermont.gov](mailto:Ailynne.adams@Vermont.gov)



# Civil Rights Complaint Procedure

- Establish a procedure for documenting and reporting complaints of discrimination
  - SFA or Sponsor Civil Rights Complaint Procedure Template  
<https://education.vermont.gov/document/sfa-or-sponsor-civil-rights-complaint-procedure-template>
- Capture details including date, names, contact information
- Refer the person to USDA website to log complaint
- Submit complaint to FNS Regional Office of Civil Rights
- Notify Vermont Agency of Education Child Nutrition Programs
- Follow required timelines

# Types of Civil Rights Reviews

- Pre-Award, Post-Award (Administrative Reviews), and Special Civil Rights Reviews.
- New sponsors receive a pre-approval visit.
- Civil rights compliance is assessed as part of the Administrative Review.
- Special Civil Rights Reviews may take place at any time should the need arise.



# Resolution of Noncompliance

- Civil rights findings must be addressed on-site and/or in Corrective Action.
- Reported to USDA FNS NERO.

# Reasonable Modifications to Accommodate Disabilities

- This topic is covered more thoroughly in the Child Nutrition Programs Civil Rights Training
- Physical accessibility
- Modifications to Accommodate Disabilities in CACFP and SFSP:
  - [https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP14-2017\\_SFSP10-2017os.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP14-2017_SFSP10-2017os.pdf)
  - Make sure you know what it is in the food and can communicate that to folks
  - Alternative meal options
- Must still provide modifications to accommodate disabilities when doing non-congregate feeding

# Treat All Students Equally

- No separation by protected bases in seating arrangements, serving lines, services and facilities, or eating periods
- Allergy-free tables, such as peanut-free tables, are acceptable, as long as they are not also “punishment” tables.

# Language Assistance

- Limited English Proficiency (LEP)
  - Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
- Consider the needs of your community and the number or proportion of LEP persons in your service area

# Translation Resources

- Free and Reduced Meal Applications are available in a number of foreign languages at:
  - <https://www.fns.usda.gov/school-meals/translated-applications>
- Other program materials may need translation.
- Foreign language teachers, community organizations, and volunteers may be used.
- Make sure they understand the confidentiality requirements.
- Interpreter hotlines are another option.
- Children should not be used to translate program requirements to parents & guardians.

# Conflict Resolution

- It is possible to avoid a potential civil rights complaint with conflict resolution techniques.
  - Remain calm; ask about the situation.
  - Listen and repeat back to be sure you understand.
  - Be empathetic.
  - Ask questions to gather information.
  - Get help from authority figures if there threats or if violence is possible.

# Customer Service

- Good customer service reduces chances of discrimination.
  - Be courteous and thoughtful.
  - Be patient and listen carefully.
  - Treat all children equally.
  - Know and be able to explain any requirements that must be followed.

# Anonymity and Confidentiality

- Keep all eligibility documentation confidential
- Prevent overt identification of child's status
  - Coded rosters for meal counting at non-residential and residential camp sites



# Subrecipient Annual Report (SAR)

# Reporting Requirements for Federal Grants

- Using federal grant dollars in a fiscal year requires that you report the grant name and amount spent to the State of Vermont on a form called the Subrecipient Annual Report (SAR).
- This report will be sent, through the mail, annually from the Vermont Agency of Administration, Department of Finance and Management.
- This form must be completed and submitted back to the state within 45 days of the close of your fiscal year.

# For more information on the Subrecipient Annual Report

- See the below link for common frequently asked questions on the Subrecipient Annual Report:
- <https://finance.vermont.gov/training-and-support/faqs-and-glossaries/grants-faq/sar>
- If you have lost your copy of the subrecipient annual report, you can print one at:
- [https://finance.vermont.gov/sites/finance/files/documents/Forms/Grant Recipients/FIN-Subrecipient Annual Report.pdf](https://finance.vermont.gov/sites/finance/files/documents/Forms/Grant_Recipients/FIN-Subrecipient_Annual_Report.pdf)

# Single Audit Requirement

- Per 2 CFR §200.500, if your organization expends \$750,000 or more in federal funds in a fiscal year, you must comply with the requirement to have a single or program-specific audit completed for that fiscal year.
- Single Audits must be completed by a licensed CPA and must be uploaded to the Federal Audit Clearinghouse within six (6) months of the close of your fiscal year:
- <https://harvester.census.gov/facweb/Default.aspx>

# Consequences of Non-Compliance

- Failure to comply with the requirements of the Subrecipient Annual Report and/or the Single Audit may subject your organization to increased programmatic and fiscal monitoring by the Vermont Agency of Education.

# For Questions On Completing the Subrecipient Annual Report

Contact:

Jordan Black-Deegan

Statewide Grants Administrator

Vermont Department of  
Finance & Management

[Jordan.Black-Deegan@vermont.gov](mailto:Jordan.Black-Deegan@vermont.gov)

(802)-828-3201

# Other Aspects of Program Operation

# Food Insecurity Resources

- Vermont Foodbank Food Shelf and Meal Site Locator: <https://www.vtfoodbank.org/agency-locator>
- Refer to the Hunger Free Vermont resource [Stretch Your Budget with Vermont Food Programs](#)
- For information on open meal sites, call 2-1-1, the United Way-run resource hotline, or go to the [USDA Meals For Kids Site Finder](#). All sites listed are open to all children, 18 and under. Sites are offering a variety of meal service methods such as grab 'n go meals, bus stop route delivery and household delivery in some circumstances. Any necessary changes to the above information are made on a weekly basis.



# State Level Outreach and Promotion

- We advertise all open meal sites on the national website Meals for Kids, <https://www.fns.usda.gov/meals4kids>, and the United Way-run resource hotline Vermont 211, and Hunger Free Vermont website
- It is extremely important for you to update your Site Applications, including question 43, to reflect actual program operation.

# Farm to Summer

- Increase the availability of local foods in meals
- Connect with local farmers, farmers' markets
- Gardening and farm-related enrichment activities

# Farm to Summer Resources

- NOFA-VT/VT FEED- Helen Rortvedt
  - (802)-828-1589
- New England Dairy & Food Council- Jill Hussels
  - (802)-863-5416
  - [jhussels@newenglanddairy.com](mailto:jhussels@newenglanddairy.com)
- UVM Cooperative Extension
  - [https://www.uvm.edu/extension/contact\\_us](https://www.uvm.edu/extension/contact_us)
  - Master Gardener Program

# Hunger Free Vermont

- Becca Mitchell  
Child Nutrition Initiatives Manager
  - [rmitchell@hungerfreevt.org](mailto:rmitchell@hungerfreevt.org)
  - (802)-231-0698
- Outreach, promotion, and technical assistance

Title 16: Education Chapter  
027: Transportation and Board Subchapter  
002: School Food Programs §1264. Food Program

- (2) Each school board operating a public school shall offer a summer snack or meals program funded by the Summer Food Service program or the National School Lunch Program for participants in a summer educational or recreational program or camp if:
  - (A) at least 50 percent of the students in a school in the district were eligible for free or reduced-price meals under subdivision (1) of this subsection for at least one month in the preceding academic year;
  - (B) the district operates or funds the summer educational or recreational program or camp; and
  - (C) the summer educational or recreational program or camp is offered 15 or more hours per week.

# Maintaining Program Integrity

- Site eligibility
- Promotion/advertising
- Serving all children equally
- Ensuring access
- Accurate record keeping
- Conducting required reviews

# Record Retention

- All records must be maintained on file for 3 years, plus the current year.
- Local rules may require records be maintained longer.

# SFSP ListServ

- Make sure you are signed up for the SFSP ListServ with your correct email address
- Please email Ailynne Adams at [ailynne.adams@vermont.gov](mailto:ailynne.adams@vermont.gov) to sign up



# Questions?

Jamie Curley

Child Nutrition Coordinator

[jamie.curley@vermont.gov](mailto:jamie.curley@vermont.gov)

(802)-828-2010

# Non-Discrimination Statement

In accordance with Federal civil rights law and U.S. Department of Agriculture (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, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992.

Submit your completed form or letter 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;
2. fax: (202) 690-7442; or
3. email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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