

Summer Food Service Program (SFSP) Overview for Summer 2020

Webinar Overview

- The intention of this webinar is to provide an overview of the program, a comparison of SFSP during unanticipated school closure and traditional summer operation, and information about SFSP waivers to help School Food Authority (SFA) sponsors decide if they will continue operation past the end of the school year

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>
- Guidance for School Nutrition Operations
 - <https://education.vermont.gov/news/covid-19-guidance-vermont-schools#nutrition>

Program Purpose

- Serve meals to kids when school is not in session during summer vacation or during unanticipated school closures, such as teacher strikes or natural disasters

Structure

- Federally-funded by the 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.
- If you are delivering meals to a childcare center, you must add the center as a site and ensure they are not also planning to claim reimbursement for those meals, either under the SFSP or Child and Adult Care Food Program (CACFP).

Adding New Sites

- 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.

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.
- $\text{Funding} = \# \text{ meals} \times \text{reimbursement rate}$

Reimbursement Rates

- The reimbursement rates during unanticipated school closure operation are the same as during traditional summer operation

2020 Reimbursement Rates

Meal	Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep	Urban/Vended
Breakfast	2.3750	2.33
Lunch/Supper	4.1525	4.0875
AM/PM Snack	.9775	.9550

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 level 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>

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.

Days of Operation and Meal Combinations

- 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
 - can do different combination of meals on different days
- You can serve weekend meals!

Types of Sites

- Open
- Closed Enrolled- Site/Area Eligible
- Closed Enrolled- Non-Site/Area Eligible
- Non-Residential Camp
- Residential Camp

Open Sites

- All children, 18 and under, can receive a meal, no questions asked.
- 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
 - Census Data
 - Housing Data

Closed Enrolled

- For children in a set program
- The sponsor is reimbursed for meals served to all children.
- This cannot only serve academic Summer School programs.
 - These types of programs must operate as an open site or NSLP in the summer
- Two types of Closed Enrolled sites:
 - Closed Enrolled in a Needy Area is area eligible
 - Closed Enrolled in a Non-Needy Area is when 50% or more of the specific population are eligible for free or reduced-price meals

Academic Summer School

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

Camps

- Non-residential camps and residential camps must have activities for the children.
- Can serve up to three meals/snacks in a day
- Only reimbursed for meals served to eligible children

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 Meals
 - 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.

Unallowable Costs

- Non-program adult meals are not allowable costs.
 - Sponsors may charge non-program adults for meals to cover these costs.
- Other unallowable meals, such as dropped meals, are not reimbursable.
- Capital expenditures are not allowed.

State Summer Food Service Funds

- Each year, we receive \$51,386.99 from the state to divide among returning sponsors and new sponsors.
- This amount will likely be more this year because it will include the state money that covered household contribution for reduced-price breakfasts and lunches during the school year.
- 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.

Meal Pattern

- SFAs may choose to use the SNP meal pattern or the SFSP meal pattern.
 - In the Site Application, indicate this choice in question B5 for breakfast and L5 for lunch.
- SFSP Meal Pattern Requirements
<https://education.vermont.gov/documents/child-nutrition-sfsp-meal-pattern>
- Grain Crediting Chart
- <https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/ExhibitA.pdf>

SFSP vs. SNP Meal Pattern

Notable Differences	SNP	SFSP
Milk	<p>Plain or flavored fat-free and 1% milk</p> <p>Must offer milk choice</p>	<p>Plain or flavored whole milk, low-fat milk, skim milk, and buttermilk</p> <p>No milk choice required</p>
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

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.

Meal Pattern Documentation

- Production Records are highly recommended, but not required
- Standardized recipes
- Child Nutrition (CN) labels
- Product Formulation Statements (PFS)
- Receipts and invoices

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

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 up after the meal service.
- Counts based on pre-order numbers, attendance numbers, or counting trays are not allowable.

Written Procurement Procedures

- Sponsors must have a written procurement plan on how to handle purchasing, outlining the applicable method of procurement used.
- The procurement plan must include conflicts of interest and codes of conduct.

Buy American Provision

- Not required in SFSP unless you also operate NSLP.
 - SFA sponsors who operate both programs must comply
- SFAs must, to the maximum extent practicable, purchase domestic commodities or products.
- This promotes the dual nature of the programs, which is to feed children healthy meals and to support American agriculture.
- There are two exceptions to this provision, which allow the purchase of foreign products.
 - Lack of availability
 - Cost of the product

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))
- 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 with meeting deadlines
- Agency of Administration: Buildings and General Services maintains a list:
 - <http://bgs.vermont.gov/facilities/forms/minority-women>

Program Paperwork

- Inventory
- Site eligibility documentation
- Menu
- Production records (highly recommended, but not required in summer)
- Invoices/receipts/documentation of food costs
- Daily Meal Count sheets
- Monthly consolidated meal counts used for claims for reimbursement

Program Paperwork Continued

- 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

Claims for Reimbursement

- The Claim for Reimbursement process is the same during regular summer operation
- 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>

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 to sign up

Waivers

Waiver of requirement that children be present

- On May 14, 2020 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 August 31, 2020

Congregate Feeding Waiver

- On May 14, 2020 the USDA extended the nationwide waiver to allow non-congregate feeding in the Child Nutrition Programs meaning grab-and-go or household delivery until August 31, 2020
- You may continue to have congregate feeding sites, it is anticipated that, as of June 1, the state-mandated limit on gathering size will be 25 people

Information Provided with Non-Congregate Meals

- If meals are served without children present, must include 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.”

Meal Service Times Waiver

- On April 21, 2020 the USDA issued the nationwide waiver of meal service time restrictions to expire August 31, 2020
- Meal services can be at any time
- Meal services can be for any length of time
- Combined with the non-congregate 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

Application Packet – Non-congregate Feeding

- If you are doing non-congregate meal service, grab-and-go or delivery, indicate the method in question 43 of the Site Application.
- While Question 43 does not appear to have anything to do with non-congregate, it's being used as a way to capture this information in the Site Application.

Application Packet – Meal Service Times

- If your programs are providing non-congregate meals and offering breakfast and lunch at the same time, you may enter that time period as your meal period for breakfast and lunch in questions B3. for breakfast and L3. for lunch in the Site Application.

Area Eligibility Waiver

- The State agency has submitted a waiver to the USDA to continue waiving area eligibility requirements through the end of the summer.
- However, we have not received questions or feedback from USDA and do not have an anticipated date on when we will know if the waiver has been approved or denied.
- Area eligibility consideration: Has your school reached 50% F&R at any point during these past few months?

Main Differences Between SFSP During an Unanticipated School Closure and Traditional SFSP Operation

Main Differences

- Health Department Notification
- Press Release
- SFSP Sponsor Training
- Staff Training
- Sponsor Monitoring
- Administrative Reviews
- Inventory

Health Department Notification

- Required to notify Health Department of when and where meals are served
- Template notification document, “Sample Health Department Notification Letter”

Health Department Notification Waiver Request

- The State agency has submitted a waiver to the USDA to be able to submit this information on behalf of the sponsors.
- However, we have not received questions or feedback from USDA and do not have an anticipated date on when we will hear whether the waiver was approved or denied.

Health Department Notification in SFSP Application Packet

- In March, sponsors were given a “Mock Health Department Letter” to upload to the Checklist Summary
- Draft your letter/email to the Health Department, and upload it to the Checklist Summary section, but do not send it (yet)

Press Release

- Requirement to notify the community of program operation
- Send out to local press, such as a newspaper

Template Press Releases

- Template Media Release for Closed Enrolled Sites and Camps
- Template Media Release for Closed Enrolled Sites in Area Eligible Locations
- Template Media Release for Open Sites

Application Packet – Press Release

- In March, sponsors were asked to upload a document, to the Checklist Summary, briefly describing how you would advertise the availability of meals to the community
- Please upload the actual Press/Media Release that will be sent out
- In questions 51 & 52 of the Site Applications, indicate Advertisement Date and Advertisement Method

Sponsor Training

- Annual required SFSP sponsor training from the State agency
- At least one representative from the sponsoring organization must participate
- FSMC employees are welcome, but cannot count as the sponsor representative
- This annual training is typically a couple of hours and will likely be scheduled sometime next week. It will also be recorded to view at an alternative time.

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

Sponsor Staff Training

- Sponsors must provide training for anyone involved in any program operations
- Training must include:
 - Program Overview
 - Meal Pattern Requirements for employees/volunteers making food
 - 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>
- Staff training must be documented
 - This can be accomplished with sign-in sheets or certificates

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.

On-Site Monitoring Waiver

- The State agency submitted a waiver to the USDA to conduct these reviews off site.
- However, we have not received questions or feedback from USDA and do not have an anticipated date on when we will hear whether the waiver was approved or denied.
- If we are granted the waiver, we have prepared review forms that can be used to assess program paperwork off site.

Sponsor Monitoring Requirements

- Pre-operational reviews are required for new or returning sites that had problems in the previous summer.
- First Week reviews are required for new or returning sites that had problems in the previous summer, it is waived for returning sites that operated successfully during the previous summer, by indicating waiver request in question 37 of the Site Application.
- Site Review within the first 4-weeks of operation for all sites, for sites continuing operation, July 1 will be the first day of operation.
- Racial and Ethnic Data Form, must be completed annually for all sites participating during the summer.

Monitoring during COVID-19

- On March 28, 2020 USDA waived the on-site monitoring requirements in Summer Food Service Program (SFSP) and Seamless Summer Option (SSO). This waiver remains in effect until June 30th, 2020 or until the expiration of the federally declared public health emergency.
- Sponsors should, to the maximum extent practicable, maintain oversight through a “desk audit” by assessing paperwork, like meal count forms and meal pattern documentation.
- Please see the complete Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program on the USDA policy memos page. On April 9th, USDA issued guidance clarifying that the 4-week monitoring is still required, but does not need to include a site visit.

Administrative Reviews Waiver

- The State agency has submitted a waiver to the USDA to be able to conduct reviews off site.
- However, we have not received questions or feedback from USDA and do not have an anticipated date on when we will hear whether the waiver was approved or denied.
- If we are granted the waiver, it will be performed as a desk audit and we will provide additional information about what that will look like.

Selection Process

- Sponsors are reviewed every three years, however you may be re-visited the following year if there were issues found in the previous summer.
- We are also required to review enough sponsors to account for at least one-half of the aggregate total program meal reimbursements in the State in the prior year.
- New sponsors are reviewed their first year of operation.
- Paperwork is reviewed for all sites.

Stipulation of the waivers

- As part of our acceptance of many of the USDA waivers during the current SFSP operation during the unanticipated school closure due to COVID-19, we have consented to review certain pieces of documentation during the next administrative review of the sponsors.
- Thus, the review will consist primarily of assessing documentation from July 1, but some documentation pieces will be reviewed from operation during the unanticipated school closure due to COVID-19.

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 letter.

Inventory

- Sponsors must conduct inventory of food and non-food supplies at the beginning and end of operation
 - This year the “beginning” will be as of July 1
 - 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

Questions?

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During this time, my work number is being forwarded to my personal cell phone. When I call from my personal cell phone, it appears as a Brunswick, ME number.

Thank-you.

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(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.

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