Summer Food Service Program (SFSP) School Year 2020-2021

Jamie Curley

Child Nutrition Coordinator

Child Nutrition Programs

Vermont Agency of Education

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Topics Covered

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- Other Aspects of Program Operation

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Program Overview

Governing Regulations

- 7 CFR 225
  - 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

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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

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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.

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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).

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Remote Learning Locations

- To serve SFSP meals at remote learning locations that are not in schools, there must be an approved Site Application in the SFSP Application Packet.

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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

- If it is a childcare located in a non-area eligible location, they cannot be a closed-enrolled in a non-needy area using the eligibility waiver, they can only be open or work with their specific population to establish some other type of site

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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.

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SFSP Application Packet Approval and Allowable Changes Procedure

- Please refer to the "Summer Food Service Program (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

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Waivers

Waiver of requirement that children be present

- On October 9, 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 June 30, 2020.

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Congregate Feeding Waiver

- On October 9, 2020, the USDA extended the nationwide waiver to allow non-congregate feeding in the Summer Food Service Program, meaning grab-and-go or household delivery until June 30, 2020.

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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."

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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 school receiving meals, do not also get grab and go meals for those same days.

- This can be accomplished through signage at the grab and go location, information provided with the meals, and information provided to households, 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 October 9, 2020, the USDA extended the nationwide waiver of meal service time restrictions until June 30, 2020.

- Meal services can be at any time.

- Meal services can be for any length of time.

- 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.

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Delivery

- School Food Authorities (SFAs) may deliver meals to households with written permission.

- If you have already obtained permission, it does not need to be re-obtained for School Year 2020-2021 operation.

- Non-profit sponsors may only do household delivery (with written permission) if no SFA in the area is providing this service.

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Grab-and-Go

- SFA and non-SFA sponsors may offer grab-and-go meals.

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Application Packet – Non-Congregate Feeding

- If you are doing fully remote learning or a hybrid model of in-person and remote learning, indicate the method of non-congregate meal service, grab-and-go or delivery, 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 to capture this information in the Site Application.

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Application Packet – Meal Service Times

- If your sites are providing meals to children doing in-person learning and remote learning 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.

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Area Eligibility Waiver

- On October 9, 2020, the USDA extended the waiver to the area eligibility waivers through June 30, 2020.

- Open and Closed-Enrolled sites can be established in non-area eligible locations.

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SFSP Operation through December 2020

- On October 9, 2020, the USDA announced the nationwide waiver to allow SFSP to operate during School Year 2021, until June 30, 2020.

- This is allowed when school operates in-person and/or remote

Meal Pattern Flexibility

- On October 9, 2020, USDA extended the nationwide meal pattern flexibility waiver through June 30, 2020.

- Sponsors may individually request meal pattern flexibilities by emailing a member of the School Nutrition team and explaining how COVID-19 has impacted their operations and necessitates the particular flexibility.

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Closed-Enrolled Area Eligibility

- On October 9, 2020, the USDA extended the nationwide waiver to allow closed-enrolled sites to use area eligibility through June 30, 2020.

- Combined with the area eligibility waiver, closed-enrolled in needy area sites may be established in non-area eligible locations.

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Waiver of First Week Site Review

- On October 9, 2020, the USDA extended the nationwide waiver of first week visits through June 30, 2020.

- They are not required for sites that operated successfully in the previous year and sponsors that successfully participate in the CACFP or the NSLP.

Waiver to Allow OVS in SFSP

- On October 9, 2020, USDA extended the nationwide waiver to allow OVS with the SFSP meal pattern and for non-SFA sponsors, through June 30, 2020.

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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 x reimbursement rate

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SFSP Reimbursement Rates

- The Reimbursement Rates for October 1-December 31 under SFSP Program Year 2021 will be the same as the reimbursement rates during SFSP Program Year 2020.

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School Year 2020-2021 SFSP 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

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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.

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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.

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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.

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"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- Site/Area Eligible
- Closed Enrolled- Non-Site/Area Eligible

- Non-Residential Camp

- Residential Camp

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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
  - Census Data
  - Housing Data

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Open sites during School Year 2020-2021

- Open sites can serve meals at no cost to all children, 18 and under.

- Schools following a hybrid model of in-person and remote instruction, and offering non-congregate meals, either in a grab and go and/or delivery style, are encouraged to consider operating as an open site in order to serve meals to all children in the community, such as siblings and homeschooled students, not just those children enrolled in the school.

School Data

- Located at or within the attendance area of a 50% or more free and reduced-price (F&R) school

- Official Free and Reduced Report with October data available on our website
  - https://education.vermont.gov/documents/edu-nutrition-2020-free-and-reduced-eligibility-report

- Over 50% in any subsequent month

Attendance Area

- If a high school with less than 50 percent free or reduced-price school enrollment is located in the attendance area of a middle school that has 50 percent or more of the enrolled children eligible for free or reduced price meals, then the high school would be area eligible. If a middle school with less than 50 percent free or reduced-price school enrollment is located in the same attendance area of an elementary school that has 50 percent or more of the enrolled children eligible for free or reduced price meals, then the middle school would be area eligible. If the high school is eligible, it makes a school located in the same attendance area as the high school, area eligible.

Attendance Area Continued

- Schools with the same grade levels in the same SFA, but not the same attendance area, cannot confer eligibility.

- Some SFAs do not have defined attendance areas and thus only data from the appropriate individual school may be used to establish eligibility.

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Census Data

Census Data, mapping tools based on annual American Community Survey data

- Food Research and Action Center (FRAC) Summer Food Mapper:

  http://216.55.168.186/FairData/SummerFood/map.asp?command=scope&map=0

- USDA Area Eligibility Mapper:

  https://www.fns.usda.gov/areaeligibility

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Housing Data

- USDA's Rural Development (RD) Housing Authorities

- Housing and Urban Development (HUD) Housing Authorities

- Local Housing Authorities

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"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 Sites in School Year 2020-2021

- Closed-Enrolled in Needy Area sites serve meals at no cost to a set population of children.

- Schools providing 100% in-person instruction may only want to serve children enrolled in the school, in which an "Closed-Enrolled in a Needy Area" site would be operated. In this case, meals would not be available from that site for younger siblings, home school children, or children who normally attend schools that are further away.

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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.
- 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

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Academic Summer School

- Programs that are operated by the school and 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

Closed Enrolled Site/Area Eligible

- If the site is located at or in the attendance area of a 50% or more eligible school or in a census data eligible area

Closed Enrolled
Non-Site/Area Eligible

- 50% or more of children in a set program are eligible for free or reduced-price meals.
  - Provide a list of enrolled children to the Food Service director and they can tell you "yes" or "no" who is eligible
  - Collect new free and reduced price meal applications (these do not carry forward to the next school year)

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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.

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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

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Advances

- The State agency has asked USDA for guidance on whether advances will be an option during School Year 2020-2021 operation.

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Application Packet Process

SFSP Application Packet Due Date

- The SFSP Application Packet for SFSP Program Year 2021, as of October 1, 2020, must be submitted and approved prior to October 1, 2020.

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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 me.

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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, this is the same information entered into the Organization Application piece of the SY2021 SNP Application Packet.

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Budget Detail

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

- Estimated Operating Costs

- Estimated Administrative Costs

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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

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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

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Transportation

- Bringing Children to Meals

- 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

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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

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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 to meals
- Buses/Vans
- Gas
- Staff to drive the 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

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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.

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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.

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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

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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
  - Required to notify the Health Department of when and where meals are being served in case they would like to conduct an inspection

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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!

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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 your sites are providing meals to children doing in-person learning and remote learning 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.

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Adding New Sites!

- New sites can be added at any time throughout the program, however no reimbursement will be received for meals served at these sites prior to the approval of the Site Application.

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Site Caps

Establishing Site Caps

- In the Site Application, for each meal offered, sponsors must enter the projected Average Daily Participation (ADP).

- ADP for school sites, should be at least as much as the total enrollment of the school.

- 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 amount 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 the 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."

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Claims for Reimbursement

Claims for Reimbursement Overview

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

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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

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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, 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".

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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.

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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 calendars days of the month.

- You must change the dates to reflect your approved operating dates for March (or whichever month you're submitted a claim for).

- 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 October 2020" (or other relevant months) 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.

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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. This edit check process well help to ensure that the information was entered correctly before the claim is submitted!

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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.

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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.

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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 up after the meal service.

- Counts based on pre-order numbers, attendance numbers, or counting trays are 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.

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Meal Counts for Open and Closed-Enrolled Sites

- Meal counts do not need to be tracked by child's name because you receive 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:
  - their electronic POS system
  - Some form of electronic spreadsheet
  - Paper tic sheet, such as the recommended Template Daily Meal Count Form

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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.

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Examples of Incorrectly Completed Daily Meal Count Sheets

Daily Meal Count Form

Site Name: Erickson Elementary School   Meal Type (circle): B (L) SN SU

Address: 118 Park Street   Telephone: (802)-123-4567

Supervisor's Name: Megan Hickson   Delivery Time: N/A   Date 07 07, 2020

meals prepared on-site

Meals received/prepared 40 + Meals available from previous day 0 = 40 (Total meals available)   [1]

First Meals Served to Children (cross off number as each child receives a meal):

Example of Correctly Completed Daily Meal Count Sheet

Daily Meal Count Form

Site Name: Erickson Elementary   Meal Type (circle): B (L) SN SU

Address: 118 School Park Street   Telephone: (802) - 123-4567

Supervisor's Name: Megan Hickson   Delivery Time: N/A   Date: 07 /07 /2020

meals prepared on site

Meals received/prepared 40 + Meals available from previous day 0 = 40 (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~~ ~~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

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.

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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.

USDA Foods

USDA Foods Contact

Cheryl Rogers

Grants Specialist

(802)-828-1590

cheryl.rogers@vermont.gov

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USDA Foods in School Year 2020-2021

- USDA Foods will follow the standard School Meals process for SFAs.

- USDA Foods are already ordered and arriving so please use them as you normally would.

Meal Pattern

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 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

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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

- Meals containing larger portion sizes are reimbursed the same amount as regular meals

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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

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Meal Service Requirements

- Family style
  - only allowed at camps and closed enrolled sites

- Cafeteria style

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Serve or Offer vs. Serve (OVS)

- ## Serve
  - All meal components must be taken.

- ## Offer vs. Serve (OVS)
  - All meal components must be offered, but some can be declined.

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School Year 2020-2021 Considerations

- [COVID-19 Guidance for Vermont Schools](#)

- You may be able to implement Offer vs. Serve (OVS) if you have a pre-order system in place.

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

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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 and Satellited 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 if individual meals are easily identifiably as a reimbursable meals. To accomplish this, we recommend including a menu with the items that identifies which items and quantities are to be used to make up each meal.

Bulk Meal Requirements

- Must include the required food components in the proper minimum amounts for each reimbursable meal being claimed;
- Must ensure that food items are clearly identifiable as making up reimbursable meals;
- Are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes;
- Should consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

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 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.

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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

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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 <u>different</u>.

"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

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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 ½ 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

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Grains at Lunch and Supper

- Bread – 1 ounce/ 28 grams slice

- Tortillas – 1 ounce/28 grams

- Pasta or rice- ½ cup

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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

As a reminder to schools: be careful, it must be 2 ounces **daily**

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 meal because watermelon and carrots sticks are from the same component.

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Snack – Two Different Components

- **Milk** – 8 ounces/1 cup

- **Vegetable and/or Fruit – ¾ 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/ ½ cup

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Snack

- Snack cannot be just a milk and juice
- This is a "liquid" snack and kids need something more substantial

- No OVS at snack.

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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.

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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

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Crediting

- Dried fruit and raw leafy greens credit as is.

- ¼ cup of dried fruit = ¼ cup of fruit

- ½ cup of raw leafy greens = ½ cup of vegetable

Crediting Resources

- Food Buying Guide

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

- Exhibit A: Grain Requirements for Child Nutrition Programs

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

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Meal Pattern Documentation

- Production Records are highly recommended, but not required

- Standardized recipes

- Child Nutrition (CN) labels

- Product Formulation Statements (PFS)

- Receipts and invoices

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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.

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

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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.

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Food Safety and Sanitation

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Health Department Notification

- Upload the "Mock Health Department Letter Fall 2020" to the Checklist Summary section

- The State agency will notify the Health Department of operation on behalf of sponsors

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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

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Health and Safety Training

- [Foodservice Employee Training Videos](#) from the Iowa State University Extension and Outreach

- [VOSHA Training](#) on COVI-19 Health and Safety Requirements

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Sanitation

- Use gloves while preparing meals and/or serving utensils, such as tongs to serve 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.

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Keeping it Cold

- 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.

Keeping it Hot

- Just because it is hot doesn't mean it can't be a sandwich, the whole meal doesn't have to be hot.

- Use warmers, restaurant heating bags, and do not open them unnecessarily.

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Procurement

Procurement Consultant

Michael Carr

Procurement Consultant

Michael.Carr@vermont.gov

(802)-828-2093

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)

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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.

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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 feed children 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.

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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

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Training

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 being 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

- Please put the date you read through this training and call it Summer Meals Training Fall 2020.

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

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Training Resources

- Use this "Summer Meals Training School Year 2020-2021" PowerPoint

- In Administrative Guide for SFSP Sponsors

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

Monitoring in School Year 2020-2021

- We do not yet know from USDA if sponsors will be required to conduct the Site Review/4-Week Review in School Year 2020-2021. If they are required, they will be allowed to be conducted as off-site review/desk audit.

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Required Sponsor Monitoring

- Monitoring must be conducted by a sponsor-level representative and cannot be an FSMC employee.

- Pre-Operational Reviews and First Week Reviews are not required for School Year 2020-2021 SFSP operation.

Site Review

- Must occur within first 4 weeks of operation for every site

- Ethnic and Racial Data Form- must be completed annually for all sites participating the summer. It is required once every session for camps.

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Racial and Ethnic Data Form

- If information cannot be gathered due to COVID-19, please note that on the sheet, if parents/guardians are picking up on behalf of children, please note that on the sheet, sponsors may also choose to use the Racial and Ethnic Data that was entered into the Organization Application section of the SFSP or SNP Application Packets.

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Administrative Reviews

Administrative Reviews
in School Year 2020-2021

- We do not yet know from USDA if we will have to conduct Administrative Reviews of the SFSP in School Year 2020-2021 or if we are able to continue the Technical Assistance Phone Calls we have been conducting.

Selection Process

- Sponsors are reviewed every three years, however you may be reviewed again 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.

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One-Half Aggregate Waiver

- The State agency submitted a request to the USDA to waive the requirement that we review a number of sponsors whose program reimbursements, in the aggregate, accounted for at least one-half of the total program meal reimbursements in the State in the prior year

- However, we have not received questions or feedback from the USDA and do not have an anticipated date on when we will hear whether the waiver was approved or denied.

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Paperwork Reviewed 1

- 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

Paperwork Reviewed 2

- Delivery receipts for vended sites
- 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

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)
- Required reviews not completed and/or thoroughly documented
- Food safety and sanitation violations

Meal Disallowances

- Missing and/or inadequate components
- Non-unitized (without waiver)
- Served to adults, but included in count of reimbursable meals

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.

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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;

- excessive instances of off-site meal consumption; and

- 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.l4(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

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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.

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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.

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SFSP Appeals Process

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

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Civil Rights

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

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Federally-Protected Bases

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

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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

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Effective Public Notification System

- Press Release

- "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.

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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 receipt comes 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 with current year SFSP Income Eligibility Guidelines
  - Template Media Release for Closed Enrolled Sites in Area Eligible Locations
  - Template Media Release for Open Sites
- If a sponsor operates multiple types of sites, must submit multiple press releases

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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

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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.

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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.

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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

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.

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Resolution of Noncompliance

- Civil rights findings must be addressed on-site and/or in Corrective Action.

- Reported to USDA FNS NERO.

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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
  - 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

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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.

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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.

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Customer Service

- Good customer 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.

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Training

- Train staff and volunteers on Civil Rights requirements

- Document with names, signatures, dates, and topics covered

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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.

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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

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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

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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.

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For Questions On Completing the Subrecipient Annual Report

Contact:

Cassandra Ryan

Statewide Grants Administrator

Vermont Department of Finance & Management

cassandra.ryan@vermont.gov

(802)-828-3201

Other Aspects of Program Operation

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

- It is extremely important for you to update your Site Applications, including question 43, to reflect actual program operation.

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.

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Maintaining Program Integrity

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

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Record Retention

- All records must be maintained on file for 3 years, plus the current year.

- Local rules may require records be maintained longer.

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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

Questions?

Jamie Curley

Child Nutrition Coordinator

jamie.curley@vermont.gov

(802)-828-2010

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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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: http://www.ascr.usda.gov/complaint_filing_cust.html, 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.

This institution is an equal opportunity provider.

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