Subject: Summer Food Service Program (SFSP) - Questions and Answers

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

Attached are questions and answers that have been received from various State Agencies and Field Offices since our last memorandum, SFSP-188, dated April 3, 1991. Please contact my staff at (303) 844-0359 if you need further information.

Ann C. Hector
ANN C. HECTOR
Regional Director
Special Nutrition Programs

Attachment
SUMMER FOOD SERVICE PROGRAM (SFSP) QUESTIONS AND ANSWERS
July 1991

1. Q. A food service management company (FSMC) providing meals in a SFSP sponsor's program is serving macaroni and cheese; however, the cheese is actually a sauce poured over the macaroni. Can this be counted as a meat/meat alternate?

   A. No. There is no way to know the amount of cheese that is in the cheese sauce.

2. Q. Can an approved sponsor add a site after the deadline?

   A. Yes. The deadline applies to the sponsor's approval, not to its sites' approvals.

3. Q. Can a private nonprofit applicant who needs to contract for meals use a hospital as its vendor?

   A. It depends on what type of hospital it is, public or private. After the determination is made, if it is a public hospital, it is allowable to vend meals from that facility.

4. Q. A sponsor uses a continuous-calendar-school's free and reduced price (F/RP) data to document eligibility. The school offers only lunch through the National School Lunch Program (NSLP). In addition to providing meals in the SFSP, the sponsor also provides an ongoing breakfast program for area children. Can the sponsor receive SFSP reimbursement for breakfasts served to children attending school?

   A. No. An SFSP sponsor can only claim meals served to children who are "off-track"/on school vacation.

5. Q. Is there anything against a camp on the Special Milk Program (SMP) switching to the SFSP?

   A. No. It is allowable for a sponsor to switch to SFSP from SMP. Dual participation is not allowable nor can sponsors switch back and forth between the Child and Adult Care Food Program (CACFP) and the SFSP.
6. Q. Can a sponsor have a telephone installed for the SFSP at a central preparation kitchen where the office for SFSP is maintained? The telephone is used in both operating and administrative functions.

A. It is allowable to claim those costs; however, the costs would have to be separated into amounts applicable to administrative versus operating and reported on the Claim for Reimbursement accordingly. The SA should review and approve the rationale for determining telephone charges to the SFSP.

7. Q. Is it acceptable for unitized, vended meals to be delivered as a unit of hot components and a unit of cold components?

A. Yes; however, the meal should be put together and served as one unit to the children.

8. Q. A camp runs different sessions that have handicapped up to age 50. Must those over 18 years have to meet the definition for children in Part 225.2 regarding participation in a public or nonprofit private school program established for physically or mentally handicapped?

A. Yes they would. The sponsor would only claim meals for attendees over 18 years that meet that definition and for individuals age 18 and under.

9. Q. Can the sponsor representative complete F/RP applications for campers himself?

A. On a limited basis, this would be allowable. Just as in the NSLP, if a household failed to apply, and the camp director, etc., has personal knowledge of a family’s economic situation, he/she could complete an application for the child. We want to stress that this procedure cannot be used extensively in approving campers for F/RP eligibility.

10. Q. A University Program that is an SFSP enrolled program wants to go off site to a camp that is on the SFSP for an overnight camping outing. How can this be handled? They would have lunch and supper the first day and breakfast and lunch the next day.

A. The SA could approve the sponsor to eat SFSP meals at the camp for the two lunches and breakfast but not supper since they are an enrolled site. They would claim those meals for reimbursement and show the cost of only those three meals based on charge per meal made by the camp. The camp would then show the money collected as income to their program.
11. Q. A school district sponsors the SFSP in the same building with a child care center participating in the CACFP. Breakfast and lunch will be offered on SFSP. The child care program wants to serve snacks under CACFP but breakfast and lunch under SFSP for some kids. Is this acceptable?

A. No. The child care program should continue serving meals under CACFP.

12. Q. An SFSP park site is across the street from a school (that school's data was used to determine eligibility). There are children attending a summer school session for handicapped children at the school. Because it is difficult to feed these children in the park setting, can the sponsor take meals over to the school for those children?

A. No; this would be considered taking the meals off site.

Q. Can they open the school as a site and have the park site also?

A. This is an allowable alternative. Since the sites are so close they must ensure that each child is served only one meal. The sponsor must complete a site sheet for the school site and it must be opened up to allow any child to participate in the SFSP who has not already had lunch that day.

13. Q. If an enrollment site uses volunteer kids under 18 and they have F/RP applications on file, can these applications be used to help meet 50 percent eligibility?

A. Yes. They can as long as the site allows others that age to enroll.

14. Q. Where sponsors show in their administrative budget the total administrative staff, even if some are paid from other sources, would the SA show only that portion to be paid by SFSP administrative funds as the approved administrative budget?

A. Yes. In order to not cause unnecessary confusion for the sponsor, only that portion expected to be covered by SFSP funds should be recorded as the sponsor’s approved budget.

15. Q. If an Upward Bound University Program goes on a field trip to another Upward Bound University Program, which one would claim the meals for SFSP?

A. The sponsors can go either way. If the host school claims the meals they would need to make a notation on their claim form; otherwise, they would be over their approved average daily attendance levels. The one thing to ensure is that both sponsors do not claim the meals.
16. Q. To determine eligibility of an open site in a large city, would we require they obtain F/RP data for the school district as a whole or the individual F/RP data for school(s) covering the geographic area covered by the site?

A. We would request the individual school’s data unless the city has no schools under 50 percent. We would allow data from more than one school if the area being served had two or three schools close together and the geographic area covered was realistic.

17. Q. Can a sponsor count for reimbursement meals they prepare at a camp site where they will take kids to have them experience camping? The meals would comply with meal patterns, etc., using food purchased for SFSP.

A. Yes, as long as prior permission is granted by the SA and the meals prepared and served meet requirements.

18. Q. A site is in a housing project which is fairly isolated and the sponsor does not expect children outside of the complex to attend. The sponsor planned to use school data: one elementary, one middle school, and two high schools, which if all four are added and averaged out may bring the percentage down below 50 percent. The sponsor believes the high schools and middle school draw children from other less poverty stricken areas, as well as the housing project. The high majority of children attending will be from grades 1-5. He took a list of children he thought would most likely attend to the elementary school and the school gave him the total number (not names) on that list that was on F/RP lunches. It exceeded 50 percent. Is this adequate to establish site eligibility?

A. No. If area eligibility is to be based on school data, it must be based on the school’s total enrollment eligibility; not just the children attending his SFSP site. Otherwise, he must have an enrollment site and have F/RP applications on file that show 50 percent eligibility. Other options available are to:

1. Look at census tract data for an area small enough to cover the housing project area and qualify the site based on census information; or,

2. Use only the elementary school’s data to qualify the area if the elementary school fully covers the area from where children would be drawn.
19. Q. Does a State University that already has audits as part of the State system have to go back to the auditing firm to sign a Debarment and Suspension Statement for SFSP?

A. No, the University should have already been aware of this requirement since it is a government-wide requirement, not just Food and Nutrition Service. Their cognizant agency should monitor this area since it is an existing contract and should have been signed at the time the contract was awarded.

20. Q. Is there a problem with approving a sponsor to go out for bid before they are approved for the Program when the SA is confident that the sponsor will be approved?

A. This should not be a problem; however, we would suggest that the language state that the awarding of the bid is conditional to the approval of the sponsor's SFSP application. In addition, the SA may want to check with the State legal department to ensure that State law does not prohibit such a procedure.