Reply to
Attn. of: SFSP-171

Subject: Summer Food Service Program (SFSP) Policy Memoranda

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 State Agencies
and Field Offices since our memorandum, SFSP-159, dated April 17, 1992. Please
contact my staff at (303) 844-0359 if you need further clarification.

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Attachment
SUMMER FOOD SERVICE PROGRAM (SFSP) QUESTIONS AND ANSWERS
June 1992

1. Q. Our office notified a sponsor to correct SFSP materials and to only request one social security number (SSN). Its free and reduced price (F/RP) application and parent letter were submitted for review. The parent letter was corrected; however, the F/RP application still requests the SSN of all household members. Do we need to make the sponsor change the F/RP application also?

   A. Yes.

2. Q. A camp has two adults for every table of six children. It serves family style meals and the adults sit at the table throughout the meal service. Can they be counted as Program adults?

   A. Only if children require special care because they are disabled. If the answer is no, a one-to-three ratio is excessive.

   Q. Another camp has physically disabled girls who need to be fed on a one-to-one ratio. Can the adults who are feeding these girls be counted as Program adults?

   A. Yes, this is acceptable.

3. Q. A food bank will be supplying Pizza Hut pizzas and Kentucky Fried Chicken (KFC) to SFSP sponsors. The food bank requires a product analysis sheet on these products. Will this be sufficient to count these meals as meeting requirements?

   A. As long as the Pizza Hut and KFC product analysis information documents that these items provide adequate meat/meat alternate, etc., they would be creditable to be served in SFSP meals. We recommend the sponsor obtain copies from the food bank and maintain them in their files.

4. Q. Can a migrant site, where parents attend, serve supper and claim the children’s meals?

   A. Yes, if the State Agency (SA) approves the supper as a meal and other guidelines are followed.

5. Q. There are two elementary schools, North and South. North Elementary has over 50 percent F/RP eligibility, while South Elementary has between 45 percent - 50 percent F/RP. The North site is under construction and unsafe for children so they want to combine the F/RP percentages for both schools and serve at the South site. However, in this case, the one site (South) is serving the whole town. Can the F/RP percentages be combined to document site eligibility?
Questions and Answers

6. Q. A site has requested serving 800 lunches per day; it served about 600 last year. Are there any restrictions on average daily participation (ADP) for sites other than ones sponsored by private nonprofits (PNPs)?

A. Section 225.6 (d) (1) (iii) indicates not to approve the site participation level for more than a facility is capable of serving. Also, Section 225.7 (d) (1) (iii), only requires that proposed nonschool sites, except for PNP, with an ADP of 300 or more, that did not participate in the prior year, have a preapproval visit by the SA. However, we suggest that someone from the SA and/or sponsor visit the site to evaluate if the site can handle an additional 200 children in a maximum 2-hour period, and if the site will have adequate supervision, etc.

7. Q. A school district receives a School Age Child Care (SACC) grant from the Department of Education for after school care and the grant is not supposed to include any funding for meals. They do not participate in the Child and Adult Care Food Program (CACFP). Since they will continue receiving the SACC funds during the summer, can they also receive SFSP reimbursement?

A. If the school district is not participating in the CACFP during the school year and there are no restrictions from the SACC grant, there should be no problem in the school district participating in the SFSP. If any of the SACC funds are allotted for food, that portion of the funds would, as with all funding sources, be reported as income to the SFSP.

8. Q. How can welfare information be used to document an "area in which poor economic conditions exist?"

A. The sponsor should contact the welfare office and carefully explain what kind of information is needed. The welfare office might provide such information as median income for an area or census tract and the average household size of that area. The sponsor must then apply the formula on page 6 of the Sponsor Handbook to the data provided to convert the income for SFSP purposes.

9. Q. If a field trip is sponsored by an organization other than the SFSP sponsor, can the SFSP sponsor allow meals to be taken off site in order for the children to participate in the field trip?

A. Yes, as long as one (or more) of the SFSP sponsor's site supervisors go with the meals to ensure proper counting and sanitation procedures are followed. This arrangement would, of course, need prior SA approval.
Questions and Answers

10. Q. A sponsor wants to drive a truck around to homeless congregating spots and provide meals from the truck. Can this be considered a site?

    A. No. A homeless feeding site means a feeding site whose primary purpose is to provide shelter and one or more regularly scheduled meal services per day.

11. Q. A sponsor has two sites in elementary school buildings and only preschool and elementary school aged children will eat at these locations. Because of safety, security, and control reasons, they do not want middle and high school aged children in the elementary school buildings. Therefore, these older children will be bussed to a middle or high school location for their meals. Across the street from one of the open enrolled middle/high school sites is a regular open site operated by the same sponsor. Is this allowable?

    A. Yes, as long as adequate controls are in place to ensure that youth from the open enrolled site do not go across the street and are also served a meal at the open site.

12. Q. Is there a waiver of the time limit requirements for breakfast and lunch meal services of one and two hours, respectively, for people who have disabilities that keep them from eating quickly enough to finish a meal in the Regulatory time frames allotted for these meal services?

    A. No time waiver is listed in the Regulations, policy, or Instructions for participants with disabilities.

13. Q. Is a sponsor required to list every site with the type(s) of meal service, and the time of each meal service in its media release?

    A. It is sufficient for a sponsor to simply list the site locations. The sponsor address and telephone number in this case would be provided so that persons interested may contact the sponsor directly. Telephone numbers for all sites could be listed so that persons can call for specific information.

14. Q. The Boys and Girls Club wants to sponsor the SFSP as an open site that qualifies based on school data and will be open to everyone. It charges an enrollment fee of $5.00 but will not deny an SFSP meal to anyone even if they have not paid the fee. However, if the fee is paid the children will be allowed to use the facilities year-round. Can the site participate in the SFSP?

    A. Yes, however, the site must be open to all children in the area regardless if they pay the fee or participate in other Boys and Girls Club activities.
15. Q. A potential PNP sponsor wants to apply to participate in the SFSP but does not have its tax exempt status from IRS. Can it be approved if it has submitted its tax exempt application to IRS?
A. No, unlike the CACFP, an SFSP applicant must have already been approved for tax exempt status prior to being approved for the SFSP.

16. Q. Can a camp program charge the transportation costs to bus children to and from camp to the SFSP?
A. No, this is not an allowable cost because it is transporting for the whole day's activities, not just the meal service.

Q. Can the sponsor charge all or a portion of its costs to rent the campground to its SFSP operating budget?
A. If it is a self preparation sponsor, it can charge only the portion of the costs relevant to the period during the meal service.

17. Q. A migrant SFSP sponsor wants to open up its Program to other children in the area. The majority of the children in the area are migrants. Is this acceptable?
A. If the sponsor opens up the Program to all children, site eligibility must be based on area/school data for the area from which it is drawing its participants. A second option would be to have two sites, one for migrants and another for the other children. Additionally, where the migrant site is eligible for up to four meals, the regular site would only be eligible for up to two meals.

18. Q. A camp sponsor has children in attendance four days but the adult staff is on site for five days. Can meals be claimed for five days?
A. No.

19. Q. Can a PNP site be self preparation for the breakfast meal service but vended for lunch?
A. Yes. Nothing in the Regulations prohibit this type operation although the accounting becomes more difficult.

20. Q. Is it allowable for two PNP sponsors to service the same site on different days? Both sponsors will operate open sites.
A. Yes.
21. Q. Are soft pretzels creditable in the SFSP if they were the same ones used in the National School Lunch Program?

A. Yes, if the pretzels weigh 25 grams for one serving and the main ingredient is whole-grain or enriched flour or meal.

22. Q. Can an SFSP sponsor with an enrolled site use data collected during the school year to document eligibility? The SFSP sponsor, in this case, is the city and not the school district.

A. No, this violates the confidentiality of income information collected by the school district. Only when the school district is the SFSP sponsor can the school’s F/RP information be transferred.