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

To: STATE AGENCY DIRECTORS (Child Nutrition Programs) - Colorado ED, Iowa, Kansas, Missouri DH, 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-239, dated June 16, 1994. 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  
May 1995

1. Q. Can a nonprogram adult who paid for a meal take a component off site?
   A. The Regulations do not address this issue for nonprogram adults. However, it may be best to discourage this so children would not want to take meals or components off site. The purpose of children not taking meals or components off site is to prevent others from consuming the meal.

2. Q. Can a SA prohibit sponsors from serving or claiming second meals?
   A. No. Sponsors have the option of whether to serve and claim seconds within regulatory limitations.

3. Q. During a site review at a Boys and Girls Club, it was noted that the children stand in lines together to receive their meals. However, the boys and girls then eat in separate rooms. Is this a civil rights violation?
   A. No. The Regulations exempts from coverage certain organizations which are exempt from taxation under section 501(a) of the Internal Revenue Code of 1964, which include YMCA, YWCA, Girl Scouts, Boy Scouts and Camp Fire Girls. Also exempt from coverage are voluntary youth service organizations of which the membership has traditionally been limited to one sex and principally to persons less than nineteen years of age. Boys and Girls Clubs are considered voluntary youth service organizations and are therefore exempt from Title IX coverage of Title VI of the Civil Rights act of 1964.

4. Q. How is average daily attendance (ADA) calculated?
   A. ADA is the number of FIRST meals served to attending children divided by the number of days of operation.

5. Q. What is the difference between ADA and average daily participation (ADP)?
   A. ADP is the average number of meals served to children, which would include second meals. ADA is the number of actual children involved. ADA and ADP could be the same if no second meals are served.
6. Q. Do camps have to do point-of-service meal counts?
   A. Yes. Page 60 of the Sponsor’s Handbook, and page 6 of the Monitor’s Handbook indicate a point-of-service count is required.

7. Q. Children at a rural feeding site are beyond reasonable walking distance. Are costs of transporting these children an allowable operating cost?
   A. Yes.

8. Q. A residential child care institution (RCCI) that participates in the National School Lunch Program wants to apply for the SFSP in order to receive reimbursement for supper and snacks. Can this be done?
   A. No. The RCCI is not expanding its program to additional children and not changing activities.

9. Q. Does a sponsor have to report income collected for nonprogram adult meals, or could the sponsor use the cost adjustment form and deduct the cost of the meals?
   A. Unless the SA specifies differently to the sponsors, the sponsors could use either method; either reporting the income and having it deducted from the costs reported, or using the cost adjustment form to remove nonprogram costs. However, the SA must ensure that nonprogram costs are not included in program costs.

10. Q. A school district is proposing a site at a school that does not have 50% eligibility. However, they bus children in during the school year. For the SFSP, the school wants to serve the area children which would be predominantly children living in trailer courts. Can the school district pull the applications for the children in the area around the school to establish eligibility?
    A. Yes. If they can identify and pull applications for the area children.