Reply to: SFSP-486

Attn of: SFSP-486

Subject: Summer Food Service Program (SFSP): Questions and Answers (Q & As) Including Follow-up Questions on Seamless Summer Feeding Waivers

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

For your information, attached is a list of policy Q & As on the SFSP and Seamless Summer Feeding Waivers that we have compiled based on questions raised by State Agencies since our last Q & A memorandum SFSP-464, issued December 23, 2002.

As you know, we periodically review questions asked by State Agencies and issue a Q & A policy memorandum such as this. We will continue to transmit any national policies as the need arises.

If you have any questions, please contact our office.

Mary Lucero
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Regional Director
Special Nutrition Programs

Attachment
Summer Food Service Program (SFSP)
Questions and Answers
July 2003

Health Department Notification

1. Q. Section 225.16(a) requires that sponsors notify the appropriate health department that a food service will be provided to children at specific sites for a specific period. Is it allowable for the State Agency (SA) to notify the appropriate health department instead of the sponsor?

A. Yes, as long as the SA has the ability to ensure that the correct local health department is notified and provided with the pertinent site information.

Seamless Summer Feeding Waivers Site Eligibility

2. Q. Does a site sheet need to be completed every year under the waiver?

A. In keeping with the National School Lunch Program (NSLP), a site sheet is not required annually under the waiver as it is under the SFSP. This is an SFSP requirement that is waived as explained in Revision 1 of the Prototype: Seamless Summer Feeding Waiver Request, Part B, transmitted under SFSP-478/SP 03-15.

3. Q. Does the SFA need to reestablish eligibility annually for a closed enrolled site in a non-eligible area?

A. Closed enrolled site eligibility does not need to be reestablished before the waiver expires in 2004. This is one of the SFSP requirements that are waived in the Prototype Waiver and listed in Part B, that was transmitted under SFSP-478/SP 03-15

Cost Allowability

4. Q. Is it allowable for a sponsor to claim the cost of a bicycle awarded to a child at an SFSP site? Could the bicycle be considered an administrative cost?

A. Costs must be necessary and reasonable for proper and efficient administration of the Program and chargeable within the guidelines of FNS Instruction 796-4, Rev. 4. Section (X A B) of this Instruction describes allowable administrative costs as including the costs
necessary for planning, organizing and managing a food service under the Program. A bicycle would not be a necessary component for administering the SFSP as explained.

5. **Q.** A school wants to charge rent for its SFSP facilities. This will maximize its costs. Is this allowable?

   **A.** No, an institution/sponsor may not rent space or facilities to itself. In addition, a sponsor cannot charge itself rent or costs for leasing vehicles or equipment that it owns. To reflect the value of the space, the school could depreciate the portion of the space used by the SFSP if the building has not already been fully depreciated. A use allowance could be used for the portion of space used for the SFSP if the building had already been fully depreciated before the school began operating Child Nutrition Programs. Or, the school could track costs for the SFSP directly if those costs are not already included in an indirect cost pool.

**Meal Service Time Restrictions**

6. **Q.** Could a breakfast last longer than the 1-hour requirement as explained in Section 225.16(c)?

   **A.** States were given flexibility through SFSP-443 to extend the meal service time frames to prevent barriers at SFSP feeding sites. However, SAs must ensure that appropriate procedures are in place to ensure that food safety and oversight are not compromised. These requests may be made as part of the application process.

**Sponsor Training**

7. **Q.** Is the sponsor required to attend SFSP training provided by the SA?

   **A.** No. The SA is required to offer training to sponsors as explained in Section 225.7(a). Remember, the sponsor is required to ensure that administrative and site personnel receive at least one SFSP training session before a site may operate as noted in Section 225.15(d)(1).

**Field Trips**

8. **Q.** Must the site supervisor accompany children on their field trip before those SFSP meals are eligible for reimbursement?

   **A.** No. There is no Regulatory requirement that the site supervisor must go on the field trip. The SA must ensure that correct meal counting and sanitary practices are being followed before field trip meals are
allowable. However two older policies, SFSP-159 #13 and SFSP-171 #9 both require that the site supervisor must go on the field trip and ensure that all meal service requirements are met. This question and answer rescinds the above individual policy Questions and Answers, SFSP-159 #13 and SFSP-171 #9.