

Q & A's from SFSP Sponsor Training

Below are the answers to the questions raised during the Summer Food Service Program (SFSP) Sponsor Training on June 9, 2020.

The [Summer Meals Training 2020](#) is available on the Vermont Child Nutrition Programs SFSP webpage.

1. **Question:** Are we able to provide a pickup of breakfast and lunch during two different time slots during a day to accommodate peoples' work schedules?

Answer: Sponsors may offer a pickup of breakfast and lunch during two different time slots, however program operators must have an integrity plan in place to ensure program accountability is maintained and that duplicate meals are not distributed. Examples of integrity plans include signage and information that accompany meals explaining program requirements.

2. **Question:** If a site qualifies as area eligible by census block data, does the sponsor have the choice of making it an open site or closed-enrolled site?

Answer: Yes, sponsors can use census data to establish an open site or a closed-enrolled site.

3. **Question:** How will sponsors receive the additional state money?

Answer: The state money fund code is 3455 and it will be paid the same way organizations receive monthly program reimbursement.

4. **Question:** With congregate service waived, are camp or closed-enrolled sites required to provide an activity?

Answer: Closed-enrolled sites are not required to provide an activity. Non-residential and residential camps are required to provide an activity per 7 CFR 225.2 "Camps means residential summer camps and nonresidential day camps which offer a regularly scheduled food service as part of an organized program for enrolled children. Nonresidential camp sites shall offer a continuous schedule of organized cultural or recreational programs for enrolled children between meal services." USDA waived the congregate feeding requirement, not the requirement to provide activities.



5. **Question:** For the purposes of determining the site’s level of administrative reimbursement, is it the county in which the sponsor or the site is located?

Answer: Yes, the county the site is physically located in will determine which level of reimbursement sites receive.

6. **Question:** Is there a decision on the area eligibility waiver?

Answer: Yes, on June 10th, 2020 the USDA extended the area eligibility waiver until August 31st, 2020. During the live recording of the SFSP Sponsor Training on June 9th, we had not yet heard from the USDA, so the version of the PowerPoint in the recording does not include this information. The SFSP Sponsor Training PowerPoint has been updated to reflect the receipt of this waiver, please review the updated “Area Eligibility Waiver” slide.

7. **Question:** When do we use the short non-discrimination statement vs. the long one?

Answer: The complete non-discrimination statement must be used on the press release any free and reduced-price meal application materials. The short non-discrimination statement must be used on program promotional materials, such as flyers and signs, calendar menus, and the informational sheet accompanying meals. Please see the updated “Short Non-Discrimination Statement” slide in the SFSP Sponsor Training PowerPoint.

8. **Question:** Where do CACFP At-Risk programs fit in?

Answer: Under the CACFP At-Risk Afterschool Meals component, meals and snacks may only be served during the regular school year. The USDA did not waive this requirement, therefore any CACFP At-Risk sites currently operating can only operate under this program until June 30, 2020. It is the intention that CACFP At-Risk sites will transition to SFSP when the school year ends.

9. **Question:** Can we sell a la carte?

Answer: Yes, SFSP programs may sell a la carte. Programs must be able to track Non-Program and Program components of food service operation, accounting for the receipt, obligation, and expenditure of all SFSP funds. The sponsor must maintain accounting records documenting proper allocation between Program and Non-Program components of its food service operation. The Smart Snacks standards do not apply in the SFSP unless the SFSP is operated at a school during the day when summer school NSLP meals are being served on campus. Please see [SP 10-2017, SFSP 06-2017 Meal Service Requirements in the Summer Meal Programs, with Questions and Answers – Revised](#) and [SP 23-2014 \(V. 3\) Questions and Answers Relate to the “Smart Snacks” Interim Final Rule](#).

10. **Question:** Do we need to have Procurement Procedures for SFSP if we have them for NSLP?

Answer: If you are a School Food Authority (SFA) and your Procurement Procedures for the school year include the necessary pieces per Child Nutrition Program requirements, including codes of conduct and conflicts of interest, then you do not need separate procedures for SFSP. If you have questions about procurement or would like help assessing your Procurement Procedures, please reach out to Michael Carr at Michael.carr@vermont.gov or (802)-828-2093.

11. **Question:** Are we able to revise the current SFSP site application to update information and extend the dates of operation or do we need to create a new site application?

Answer: Yes, you can revise the current SFSP Site Applications to extend the dates of operation. Be sure to change the end date before the current end date indicated in the Site Application. For sites that are changing the method of non-congregate feeding, such as switching from delivery to grab-and-go, please indicate this and the date of the switch in question 43 of the Site Application.

12. **Question:** Does transportation staff need Civil Rights training? Even if they are community volunteers?

Answer: Yes, all staff involved in the implementation of SFSP must receive Civil Rights training. We have the [Annual Civil Rights Training Recorded Webinar](#) and [Child Nutrition Programs Civil Rights Training](#) slides available on our website. Either can be used to accomplish the training requirement. Civil Rights training must be documented in some format, use of the [Child Nutrition Programs Civil Rights Training Documentation](#) is recommended.

13. **Question:** Does the training for Civil Rights carry over to the NSLP?

Answer: If you have already completed Civil Rights training this calendar year as part of your involvement in SNP or CACFP, you do not need to take it again.

14. **Question:** How often can we serve full-strength (100%) juice?

Answer: Juice can be served to meet no more than half of the fruit/vegetable component requirement.

15. **Question:** Are we required to accommodate certain health/dietary restrictions? Example- gluten-free?

Answer: You are required to continue making meal modifications to accommodate disabilities. For modifications that fall outside the meal pattern requirements, obtain a medical statement from a State licensed medical professional. Please see the

“Modifications to Accommodate Disabilities” section of the [Child Nutrition Programs Civil Rights Training](#) and the [Policy Memorandum on Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program](#).

16. **Question:** What is the recommended form/document for recording a meal count during food service for a Closed-Enrolled Camp?

Answer: There are residential camps, non-residential camps, closed-enrolled sites, and open sites. There are no Closed-Enrolled Camps. For a camp site, it is recommended that a roster, such as an Excel sheet is used, with all the children’s names and meals served. If eligibility status is included, it must be coded for confidentiality purposes. For closed-enrolled and open sites, the Daily Meal Count Sheet provided by VTAOE CNP is recommended.

17. **Question:** Do we need to replace the old ‘And Justice for All’ posters if we still have last year’s?

Answer: The “And Justice for All” non-discrimination posters need to be the current, updated version with the United States Department of Agriculture building, not the Statue of Liberty. CNP understands it will take time to update the posters, please reach out to Ailynne Adams at Ailynne.adams@vermont.gov or (802)-828-1626 to receive updated posters.

18. **Question:** I sent the letter to the health department and sent the press release before adding a site application? Do I need to update and resend both of these?

Answer: You do not need to send updated versions of the health department letter or the press release. However, if the additional site is an open site, you must advertise it in some way to the community, whether that is through school channels, social media or another press release.

19. **Question:** If the training that we give occurs online how do we collect signatures? Also, as we do desk audits how do we get signatures?

Answer: Online training can be documented by collecting signatures, including e-signatures, or by issuing certificates of completion. CNP has asked our USDA Regional Office if the signature requirement can be waived or if an e-signature is sufficient.

20. **Question:** May we offer Monday-Friday meal service and allow folks to take home multiple days’ worth of meals on Tuesdays and Thursdays?

Answer: Sponsors may offer Monday-Friday meal service and allow folks to take home multiple day’s worth of meals on Tuesdays and Thursdays, however program operators must have an integrity plan in place to ensure program accountability is maintained and

that duplicate meals are not distributed. Examples of integrity plans include signage and information that accompany meals explaining program requirements.

21. **Question:** You said you are working on a document for desk audits? A desk audit is different than the SFSP emergency closure 4-week review form?

Answer: CNP has updated the sponsor review forms and created accompanying guidance on how reviews will be conducted in summer 2020, [SFSP Desk Audit Guidance for Sponsors During Summer 2020](#).

22. **Question:** Is the subrecipient grant report a new requirement?

Answer: The Subrecipient Report is not a new requirement. It is required for recipients of federal funds. It is a process predominantly handled by Vermont Department of Finance & Management. Please see the “For more information on the Subrecipient Annual Report” slide of the SFSP Sponsor Training PowerPoint, which includes the link to a blank [State of Vermont Subrecipient Annual Report](#) and [Common Subrecipient Annual Report \(SAR\) Questions](#).

23. **Question:** Do program adult meals get counted with the child meals?

Answer: Program adult meals do not get counted with the child meals. Program adult meals must be counted and tracked separately from participant meal counts. These meals are reported in a separate section on the claim for reimbursement. Meals served to Program adults are an allowable cost, but are not eligible for reimbursement.

24. **Question:** The system does not have FY21 for the summer application?

Answer: SFSP is operated on the federal fiscal year which runs from October 1st to September 30th. Therefore, this summer 2020 is part of FY2020, not FY2021. Please see updated “Structure” slide of the SFSP Sponsor Training PowerPoint.

25. **Question:** Consolidated Federal Programs (CFP) at AOE says “2 bids and a buy” and you say “3 bids and a buy”?

Answer: Technically, you must compare at least two prices, but it is highly recommended to compare three prices, to ensure you are receiving the best price and promoting equal competition to receive federal dollars.

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