Summer Food Service Program (SFSP) Summer 2024

Jamie Sutter

Child Nutrition Coordinator

Child Nutrition Programs

Vermont Agency of Education



Topics Covered

Program Overview
Reimbursement Rates
Site Types
SFSP State Money and Advances
Application Packet Process
Site Caps
Claims for Reimbursement
Meal Counts
USDA Foods
Meal Pattern
Food Safety and Sanitation
Procurement
Food Service Management Companies (FSMC)
Training
Sponsor Monitoring
Administrative Reviews
Serious Deficiency (SD) Procedure
Civil Rights
Subrecipient Annual Report (SAR)
Other Aspects of Program Operation



Program Overview

Purpose of the Program

•The Summer Meals program bridges the gap between school years, providing children with nutritious and delicious meals, giving them the fuel they need to play and grow throughout the summer months and return to school ready to learn.

Children

- Persons 18 years of age and under
- Persons over 18 years of age who are determined by a State educational agency or a local public educational agency of a State to be mentally or physically disabled and who participate in a public or nonprofit private school program established for the mentally or physically disabled.

Governing Regulations

- •7 CFR 225
 - 7 is for the United States Department of Agriculture (USDA)
 - CFR means Code of Federal Regulations
- USDA FNS Policy Memos

SFSP Resources

- VT AOE SFSP webpage
- SFSP Program Guides
 - Administrative Guidance for Sponsors
 - Sponsor Monitor's Guide
 - Nutrition Guidance for Sponsors
 - Site Supervisor's Guide

Structure

- Operates on the federal fiscal year (October 1 to September 30)
- •Federally-funded by the U.S. Department of Agriculture (USDA) Food and Nutrition Service (FNS)
- Country is divided into regions and we report to the Northeast Regional Office (NERO)
- State-administered by Vermont Agency of Education Child Nutrition Programs
- •The program consists of **sponsors**, who are managerially and financially responsible for the program, and **sites**, which are the physical locations where meals are served.



Sponsors

- •Sponsors accept an agreement, "Permanent Agreement", with Vermont Agency of Education Child Nutrition Programs and an annual Application Packet in <u>Harvest Child Nutrition System</u>.
- •Sponsors can be School Food Authorities (SFAs), private nonprofit organizations, government entities, residential camps, or other non-profit organizations.

Multi-State Sponsors

 The Org Info tab of the Organization Application in the Application Packet asks, "Does your program operate in more than one state?" If "Yes", enter the name of the other state(s). Per SFSP 01-2014 Sponsors Operating in Multiple States in the Summer Food Service Program, there are specific requirements for multi-state sponsors.



Sites

- •Per 7 CFR 225.2 "Site" means the place where a child receives a program meal. A site may be the indoor or outdoor location where congregate meals are served, a stop on a delivery route of a mobile congregate meal service, or the distribution location or route for a non-congregate meal service. However, a child's residence is not considered a non-congregate meal site for Program monitoring purposes.
- You must have a separate Site Application for each site where meals are served.
- •There can be multiple programs and activities taking place at a site.



For-Profit Sites

- Must operate under a non-profit sponsor
- Must be an open or restricted open site
- Site operators cannot prepare the meals
- Only sponsor staff/volunteers may distribute meals
- Refer to <u>SFSP 13-2011</u> For-Profit Locations as Meal Sites in the Summer Food Service Program
- •This is addressed in the Tax Status question of the Site Type and Eligibility tab in the Site Application.



CACFP Child Cares in SFSP

•Per <u>FNS Instruction 782-4 Rev. 2</u> Approval of Child Care Institutions for the Summer Food Service Program, CACFP institutions which have sufficient changes in their activities or enrollment or develop a separate food service program for children who are not enrolled in their CACFP, (and meet SFSP requirements), may be approved to participate in the SFSP.

Approval of Sponsors and Sites

- Priority approval to SFA-sponsors
- Prevent duplicate meal service
- Prevent the same population of children from receiving the same meal on the same day

SFSP Waivers

•We can submit state-specific waivers if they do not alter the meal pattern or cost the Federal government more money.

SFSP Press Release

- •The State agency completes the required press release on behalf of all sponsors.
- •Sponsors of open and restricted open sites are still expected to conduct outreach and promotion.

Non-Congregate Meal Service

- Interim Final Rule: Establishing the Summer EBT Program and Rural Non-Congregate Option in the Summer Meal Programs
- •SFSP 07-2024, SP 13-2024 Non-Congregate Meal Service in Rural Areas Questions and Answers
- •SFSP 08-2024, SP 15-2024 Non-Congregate Meal Service in Rural Areas: Questions and Answers #2
- •Please see the <u>Non-Congregate Meal Service in SFSP</u> <u>Training</u> on April 11th, 2024 from 3:00-4:00PM.



Reimbursement Rates

Funding Structure

- SFSP is a reimbursement-based program.
- •Sponsors are reimbursed at a set rate for eligible meals and snacks served to children at approved sites.
- •Funding = # meals x reimbursement rate

2024 SFSP Reimbursement Rates

Meal	Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep	Urban/Vended
Breakfast	\$2.9775	\$2.9225
Lunch/Supper	\$5.2125	\$5.1300
AM/PM Snack	\$1.2350	\$1.2050



2023 SFSP Reimbursement Rates

Meal	Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep	Urban/Vended
Breakfast	\$2.8250	\$2.7725
Lunch/Supper	\$4.9500	\$4.87
AM/PM Snack	\$1.1675	\$1.14



Administrative and Operating Reimbursement

- •SFSP reimbursement is broken into Administrative Reimbursement and Operating Reimbursement.
- •All sites receive the same operating rates for meals, but depending on the site, the administrative reimbursement rate may be different.

Administrative Reimbursement

- Rural/Self-Prep
- Rural/Vended
- Urban/Self-Prep
- Urban/Vended

 Urban/Vended is the only type of site that receives the lower-level of administrative reimbursement.



Urban vs. Rural

- USDA Rural Designation Map
- •Sites can also be determined rural if it is located in a "pocket" within a Metropolitan Statistical Area which, at the option of the State agency and with FNSRO approval, is determined to be rural in character based on other data sources "7 CFR 225.2 Definitions *Rural*."
- •SFSP 04-2024, SP06-2024 Rural Designations in the Summer Meals Programs- Revised

Site Location

- •This is addressed in the Site Location question of the Site Type and Eligibility tab in the Site Application.
- •It is critical that this is accurate because it affects your reimbursement rate.

Self-Preparation vs. Vended

- •Self-preparation means the sponsor prepares the meals that will be served at the site(s) and does not contract with a Food Service Management Company (FSMC), SFA, or other sponsor for the preparation of meals, even if the meals are sent to other sites for service.
- •Vended means an FSMC, SFA, or sponsor prepares the meals, whether the meals are prepared on-site come from a central kitchen, they are considered vended.

Meal Preparation Method

- •In the Meal Preparation question of the Meal Service Information tab of the Site Application, indicate if meals are prepared self-prep/on-site or if they are vended or satellited.
- •It is critical that this information is accurate as it is tied to your reimbursement.

Meal Preparation Facilities

•This tab must be completed for central kitchens and any site with a Food Service Management Company (FSMC) providing meals, even with on-site preparation.

Site Types

Types of Sites

Open

Restricted Open

Closed-Enrolled

Non-Residential Camp

Residential Camp



Open Sites

- Must be area eligible.
- •Stigma-free, barrier-free method of meal service as it is the site that qualifies, not the individual children.
- •All children can receive a meal, no questions asked.
- The sponsor is reimbursed for meals served to all children.
- May serve up to two meals/snacks per day.

Area Eligibility

- •SP 08-2017, CACFP 04-2017, SFSP 03-2017 Area Eligibility in Child Nutrition Programs
- School Data
- Census Data

School Data

- •Site located at or within the attendance area of a 50% or more free and reduced school.
- •Based on the Free and Reduced Eligibility Report 2024.
- •Or if the school reaches 50% or higher in any subsequent month.
- *December CEP implementation



Attendance Area Continued

- •Schools with the same grade levels in the same School Food Authority (SFA), but not the same attendance area, cannot confer eligibility.
- •Some SFAs do not have defined attendance areas and thus only data from the appropriate individual school may be used to establish eligibility.

Attendance Area

- •If a high school with less than 50 percent free or reduced-price enrollment is located in the attendance area of a middle school that has 50 percent or more of the enrolled children eligible for free or reduced-price meals, then the high school would be area eligible.
- •If a middle school with less than 50 percent free or reduced-price school enrollment is located in the same attendance area of an elementary school that has 50 percent or more of the enrolled children eligible for free or reduced-price meals, then the middle school would be area eligible.
- •If the high school is eligible, it makes a school located in the same attendance area as the high school, area eligible.



Medicaid Demonstration Project

- •In School Year 2023-2024, Vermont began participating in a Medicaid Demonstration Project, to directly certify students for free and reduced-price meals through Medicaid data. These households are not required to submit income applications.
- •Income application retention has been very low since the pandemic and since Vermont's adaption of Universal School Meals beginning in School Year 2022-2023.
- •This information has greatly increased the number of schools at or above 50% free and reduced.

Census Data

Census Data Mapping Tools:

- USDA Area Eligibility Mapper
- Share Our Strength No Kid Hungry Averaged Eligibility Map
- Food Research & Action Center (FRAC) Summer Food Mapper



"5-Year Rule" for Area Eligibility

- Area eligibility is established for 5 years.
- This creates consistency and builds trust.
- •However, as possible, update data every year, to extend the 5-year count.
- •This data is good for 5-years, even if the site operates, then does not operate, then operates again and even if the site operates under a different sponsor.

Temporary Site Relocation due to Construction

If an area eligible site cannot operate due to construction, there is the potential to temporarily move the area eligibility of that site to another location in order to serve the population that would have been served. This requires approval from the National Office. Interested sponsors should request this flexibility by emailing with response to the following questions:

- 1. The relocation of the sites will be *temporary* (the new site would only serve children for one summer while construction is being completed);
- 2.the site intends-to serve the same children that were served by the original site;
- 3. there are no other options to serve the children at a site in an eligible area; and
- 4.the temporary site is the available site closest to the original site.
- •Each site transfer request is handled on a case-by-case basis. If any of the above conditions are not met, a waiver request will be required.
- •In the Site Type and Eligibility tab, please answer "Yes" to the question "Are you using an alternate option as instructed by the State agency" and explain in the text box.



Restricted Open

- •Site attendance is limited for safety and security reasons.
- •This should not be to stop area children from participating in the program.

Closed Enrolled

- •For a set population of children.
- •The sponsor is reimbursed for meals served to all the children.
- Sites can be reimbursed for up to two meals/snacks per day.
- •This cannot be to only serve for academic Summer School programs. In the Site Type and Eligibility tab of the Site Application, it asks "Is your site an academic summer school?"



Academic Summer School

•Programs that are operated by the SFA/school that students are required to attend or would result in a grade on the student's transcript.

•Must be open site in SFSP or operate National School Lunch Program (NSLP) in the Summer.

Closed Enrolled Site Eligibility

- Closed enrolled sites can be established through area eligibility
 OR
- •If 50% or more of the children enrolled in the site are eligible for free or reduced-price meals

Area Eligible Closed Enrolled Site Justification

- Area eligible closed-enrolled sites must provide justification as to why they are not open sites.
- Question in the Site Type and Eligibility tab of the Site Application,
 "Explain the reason you are operating a closed-enrolled site."
 Reasons could include limited staff, space, or safety concerns.

Summer Feeding Options

- Summer Food Service Program (SFSP)
- NSLP Seamless Summer Option (SSO)
 - SFAs only
- National School Lunch Program (NSLP) in the Summer
 - o SFAs only



Non-Residential Camp

- •This is where fewer than 50% of the children in a set program qualify for free and reduced-price meals.
- Sponsors are only reimbursed for meals served to eligible children.
- Can serve up to three meals/snacks per day.
- Must provide activities for the children between meal services.

Residential Camp

- •A residential summer camp must offer a regularly scheduled food service as part of an organized program for enrolled children.
- Sponsors are only reimbursed for meals served to eligible children.
- Can serve up to three meals/snacks per day.

Approving Meal Applications

If you are a camp or non-area eligible closed-enrolled site that needs to collection applications, please use these resources:

- Free and Reduced Meals page of VTAOE CNP website
- Eligibility Manual for School Meals
- Application for Free and Reduced Price School Meals 2023-2024
- Summer Food Service Program (SFSP) Income Eligibility Guidelines 2024
- Determining Eligibility for Free and Reduced Price School Meals: Module 3:
 Processing Free and Reduced Price Meal Applications



SFSP State Money and Advances

State Summer Food Service Funds

- •Each year, we receive \$51,386.99 from the state to divide among sponsors.
- Allocation is based on number of meals served at non-residential camp sites in the previous summer or projected number of meals for new sponsors.
- •This money can be used for start-up costs associated with beginning the program each summer.
- •This money has a 3455 revenue code, "State Summer Food Service Program Funds", and you receive it the same way you receive program reimbursement.

Advance Amounts

- •For returning sponsors, the amount is based on a percentage of the prior year's claim for reimbursement from the same month.
- •For new sponsors, the amount is based on the projected number of meals to be served.
- •If the advance provided exceeds the claim for reimbursement, the sponsor must repay the amount.
- May request advances for operating costs and/or administrative costs.



Advances for Operating Costs

- •May request at least 30 days before the payment dates of June 1, July 15, and August 15.
- •Sponsors must provide documentation that non-SFA sponsor personnel have received training prior to receiving the second month's operating advance.
- •Sponsors may not receive advances for operating costs in any month where they operate less than 10 days.



Advances for Administrative Costs

- May request at least 30 days before June 1 and July 15.
- •If sponsors operate less than 10 days in June, but at least 10 days in August, the second month's advance payment will be issued on August 15.
- Sponsors that operate less than 10 days may not receive advances for administrative costs.

Requesting an Advance

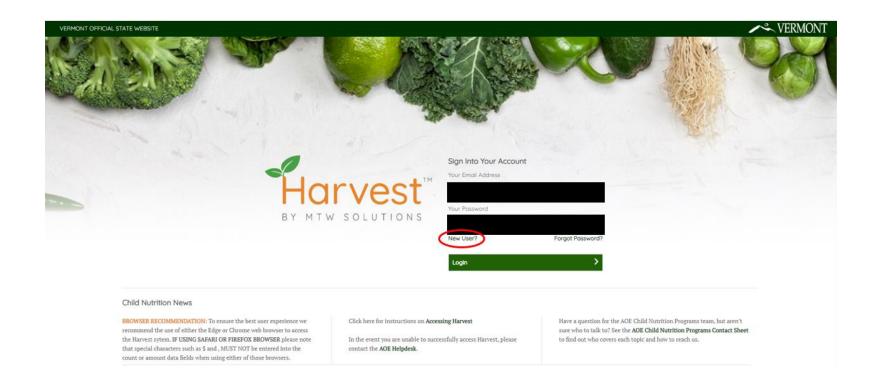
- •Sponsors may request advances through the Advances tab of the Organization Application section of the Application Packet.
- •To be eligible for second and third advance payments, sponsors must certify that it is operating the number of sites for which the budget was approved and that its projected costs do not differ significantly from the approved budget.
- •Non-SFA sponsors must conduct training sessions before receiving the second advance payment. Training sessions must cover Program duties and responsibilities for the sponsor's staff and for site personnel.

Application Packet Process

Online System

- •SFSP Application Packet can be found in the <u>Harvest Child Nutrition</u> <u>System</u>.
- •To request new user access in Harvest, please follow the instructions found in Accessing Harvest. This guidance also addresses name changes, how to request additional access, and forgot password process.

Creating a New User ID



Application Packet Overview

- Refer to the <u>2024 SFSP Application Packet Overview</u>
- SFSP Application Packets are due June 1st
- •Be sure to submit the Site Application(s) and the overall Application Packet.

Updating Sites and Adding New Sites

- •Site information can be updated throughout the summer, however, must be approved in the Application Packet prior to implementation.
- •New sites can be added at any time throughout the summer, however no reimbursement will be received for meals served at these sites prior to the approval of the Site Application.
- •Please allow for a minimum of 3 business days prior to implementation of changes or start of new site.

SFSP Application Packet Approval and Allowable Changes Procedure

- •Please refer to the <u>SFSP Application Packet Approval and Allowable Changes Procedure</u>.
- •This details the requirements for retroactively adding dates of operation which includes submitting meal counts, meal pattern documentation, and eligibility information (if applicable) for the dates in question.

Organization Profile

- •If you are already operating the School Nutrition Program or CACFP, you will need to ensure your Organization Profile has the correct information for SFSP.
- •If only operate SFSP, create Organization Profile before the SFSP Application Packet.
- •In the Organization Profile Page 3 tab, if not an SFA or government, must upload tax exempt status documentation.

SFSP Application Packet

Org Info

Contact Info

Ethnicity and Race Data

Outreach

Training

Advances

General Questions

Meal Preparation Facilities

Management Plan

Site Applications

Budget

Certification



Management Plan

- •This is a new requirement in summer 2024.
- Demonstrate compliance with Viability, Capability, and Accountability (VCA) standards.
- •Refer to <u>SP 03-2023</u> Guidance on Performance Standards, Budgets, and Management Plans in the Summer Food Service Program.

Sponsors in Good Standing

- •Good standing "means the status of a program operator that meets its Program responsibilities, is current with its financial obligations, and, if applicable, has fully implemented all corrective actions within the required period of time."
- •CACFP and School Meals operators in good standing will not be required to complete the Management Plan.

Budget

- •The Site Application(s) must be completed before the Budget.
- •The projected number of meals in the Operating Reimbursement and Administrative Reimbursement sections of the Budget are automatically populated once this information is entered in the Site Application(s).
- •The Budget must be updated any time a new site is added after packet approval.
- •It is an administrative planning tool and it sets boundaries to help ensure financial viability.
- Estimated Operating Costs
- Estimated Administrative Costs



Financial Management in SFSP

•FNS Instruction 796-4, Rev. 4 Financial Management – Summer Food Service Program for Children

Allocating Costs for Camp Sponsors

- •Per <u>FNS Instruction 796-4</u>, <u>Rev. 4</u> Financial Management Summer Food Service Program for Children, camp sponsors must allocate operating costs to distribute those costs between meals served to children eligible for free and reduced-price meals, as well as program adults, and meals served to non-eligible children and others.
- •A recommended way to calculate these operating costs are Number of Program Participants/Total Number Served= Percentage Factor. The camp may apply this percentage factor to the associated operating costs for each session to determine eligible operating costs.

Operating Costs

 Operating costs are those that are directly related to the preparation and service of meals

And the direct supervision of children during serving time

Food Costs

- Maintain vendor invoices and delivery receipts
- Transportation charges
- Storing and distributing USDA Foods, if applicable

Non-Food Supplies

Non-food supplies are non-edible.

- Paper and plastic utensils and service items
- Cleaning supplies

Labor Costs

Salary and Fringe Benefit Costs

- Preparation, delivery, and service of meals, and clean-up
- Direct supervision of children
- Record-keeping



Transportation

- •Bringing children in rural areas to meal sites in rural areas
- Bringing meals to children

Other Direct Operating Costs

- Other potential costs could include the rental of food service preparation and dining facilities
- Equipment for storage, preparation, service, and transportation

Administrative Costs

- Costs related to planning, organizing, and managing the program.
- Administrative Labor related to training, monitoring, and paperwork, like completing the online Application Packet, and filing claims for reimbursement.

Administrative Costs Continued

- Office Space Rental
- Other expenses can include mileage, telephone, office supplies, and audit fees

Allowable Costs

- Staff pay and benefits for operation and administration
- Overtime pay
- Hazard pay
- Food
- Utilities
- Equipment, including extra storage and refrigeration units
- Equipment repair
- Small wares, like coolers, ice packs, and hot carriers
- Packaging materials, such as paper bags, clam shells, other containers
- Kitchen cleaning



Allowable Costs Continued

- Cleaning supplies
- General supplies, like paper goods and utensils
- Printing of informational handouts to accompany the meals
- Personal Protective Equipment (PPE), such as gloves and masks
- Transportation of meals to children or children in rural areas to meal sites in rural areas
- Gas
- Staff to drive buses/vans
- Staff to hand out the meals
- Indirect costs with approved rate from VT AOE



Indirect Costs

- Only allowed for Administrative Costs
- •SFA sponsors must have an approved indirect cost rate from the finance team in Vermont Agency of Education
- Non-SFA sponsors must have an approved indirect cost rate from AOE or their cognizant agency
- In the General Questions tab of the Organization Application, indicate whether indirect costs will be applied.



Unallowable Costs

- Non-program adult meals are not allowable costs.
 - Sponsors may cover the cost with non-federal funds or may charge nonprogram adults for meals.
- •Other unallowable meals, such as dropped meals, are not reimbursable.
- Additional foods.
- Capital expenditures are not allowed.
- Other capital assets, including vehicles.

Other Income to the Program

Any other income to the program, besides reimbursement:

- includes money for non-program adult meals
- donations, monetary or food (estimate monetary value of donated food)
- grants received
- general fund support



Revenues in Excess of Expenses

- Can be used to improve SFSP
 - Improving the quality of the food provided
 - Upgrading meal service sites or food preparation facilities
 - Enhancing monitoring training, and other oversight activities
- Can be put towards the following year's Summer Meals Program
- Can be used for other Child Nutrition Programs

Meal Preparation Facilities

- •If a site receives meals from a central kitchen, a Meal Preparation Facility must be entered for the central kitchen.
- •If a site has a Food Service Management Company (FMSC) or vendor prepare the meals, a Meal Preparation Facility must be entered for that site and include information about the contract or vended meals agreement.

Site Field Trip Data Collection

- Go to Data Collections and select "Field Trip"
- •Field trips are allowed, but sponsors must notify the State agency.
- •All program requirements must be followed, this includes:
 - Point of Service (POS) meal counts
 - The "And Justice for All" poster must be displayed
 - Meals must be kept at safe temperatures
 - Breakfast, lunch, and supper meals offered must include milk
 - Open sites must remain open during field trips



Health Department Notification Waiver

- •We have requested a waiver allow us at the State agency to notify the Health Department of program operation on behalf of sponsors. We have received this waiver for the past few years and anticipate that we will receive it again.
- •The SA will send Health Department site list 3 times for summer 2024, starting June 1st, 2024.

Site Application(s)

- Site-specific information for each meal site.
- Logistical information about location, contact information, and meals served.
- Site Info
- Site Type and Eligibility
- Site Operation
- Ethnicity and Race Data
- Meal Service Information
- Meal Service Operation
- Non-Congregate (if applicable)
- Certification



Days of Operation and Meal Combinations

- Meal types include breakfast, AM snack, lunch, PM snack, and supper
- Non-residential and residential camps
 - up to 3 meals a day, any combination there of
- Open and closed enrolled sites
 - up to 2 meals a day; cannot do lunch and supper in the same day
 - can do different combination of meals on different days
- You can serve weekend meals!



Times

- •Breakfast must be served at or close to the beginning of the day and cannot be served after lunch or supper.
- •A minimum of one hour must elapse between the end of one meal service and the beginning of another. This is applicable for all sites, except for residential camps.

Site Caps

Establishing Site Caps

- •In the Site Application, for each meal offered, sponsors must enter the projected Average Daily Participation (ADP).
- Aim a littler higher than you anticipate for the ADP.
- •Based upon this information, the system will establish a Site Cap that is 20% greater than the projected ADP.

Changing Site Caps

- •If the number of meals served within the claiming period appears as though it might potentially exceed the Site Cap, the sponsor must email the State agency to request to increase the ADP and thus that the Site Cap be increased.
- •This must be done prior to submitting the Claim for Reimbursement. The sponsor will need to revise the Site Application to revise the ADP and re-submit the Application Packet for approval by the State agency. The State agency will increase the Site Cap and approve the Application Packet.
- Afterward, the sponsor can enter the claim without error.

Claims for Reimbursement

Claim Submission Dates

- Claims for Reimbursement must be submitted within 60 days of the last day of the claim month.
- *For deadlines that fall on a Saturday, Sunday, or a Federal Holiday, the due date is the next business day (this is for all programs, except Fresh Fruit and Vegetable Program (FFVP))
- •60-Day Deadline Dates for Claims for Reimbursement
- Claims are paid every two weeks on Thursday.



Late Claims

- •Exceptions for late claims may only be approved once in a 36-month period, by program.
- Child Nutrition Programs Late Claim for Reimbursement Procedure

Claim for Reimbursement Submission

•SFSP Claims Entry Instruction

Claim Submission Procedure

- •Sponsors should have a process in place to ensure that at least two people are involved in entering and submitting the Claim for Reimbursement to help prevent any underclaim or overclaim issues due to human error.
- •The CNP team strongly recommends that a sponsor representative enters the information in the Site Claim Reports and provides the back-up documentation (*Monthly Consolidated Meal Count Sheet* and the *Daily Meal Count Sheets*, if applicable) to another sponsor representative to look over the documents and entered information. This edit check process will help to ensure that the information was entered correctly before the claim is submitted.

Serving Second Meals

- •Serving seconds is an option, however you are only reimbursed for 2% of first meals served.
- Sponsors should not prepare meals with the intention of serving seconds.
- Second meals may only be served after all participating children have been served a first meal.
- •How do you determine who gets a second if there are not enough for those that want them?
- Some only do it on Fridays when leftovers will not last over the weekend.
- •Per 7 CFR 225.15(b)(4), second meals may not be served as part of non-congregate meal service.



Reimbursement for Second Meals

- •You can only be reimbursed for up to 2% of first meals served.
- •This is based on the total number of first meals served by meal type each claiming period.
- The system calculates this number.

SFSP CFDA Number and Revenue Codes

- CFDA Number is 10.559
- Summer Food Service Program revenue code is 4455
- •State Summer Food Service Program Funds revenue code is 3455
- CNP CFDA Numbers with Revenue Codes

Meal Counts

Point of Service (POS) Meal Counts

- •Point of Service (POS) meal counts must be taken at the time each child receives a reimbursable meal.
- Meal counts cannot be taken before the meal is served or counted after the meal service.
- Counts based on pre-order numbers, attendance numbers, or counting trays or number of leftovers is not allowable.

Meal Counts for Camp Sites

- Meals must be tracked by child's name and eligibility status.
- •If using an electronic Point of Service (POS) or paper roster, sites must prevent overt identification of eligibility status by ensuring that the child's status is coded or if using a paper roster, tracked on a separate, secure document.
- •It is critical that we continue to maintain confidentiality and anonymity of eligibility status.

Meal Counts for Open and Closed-Enrolled Sites

•Meal counts do not need to be tracked by child's name because reimbursement is received for meals served to all children.

Daily Meal Count Form Options

Sponsors may use:

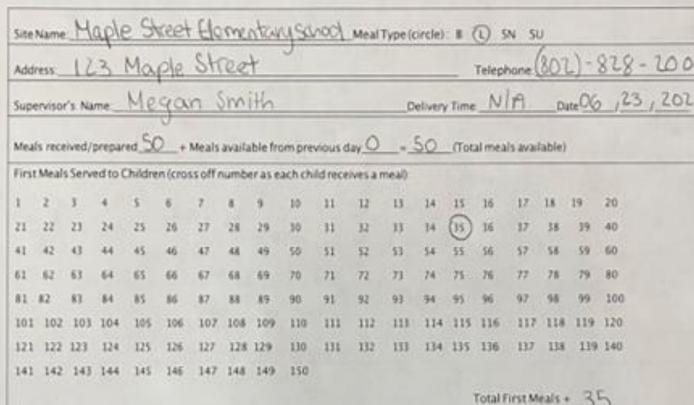
- Electronic POS system
- Some form of electronic spreadsheet
- Paper tic sheet, such as the recommended <u>Template Daily</u> <u>Meal Count Form</u>

Daily Meal Count Form

- If the Daily Meal Count Form is used, it must be completed correctly, with meals hashed off or individually circled.
- Drawing a continuous line through the numbers or served or simply writing a total number, no numbers hashed or circled, is not acceptable.

Example of Incorrectly Completed Daily Meal Count Sheet 1

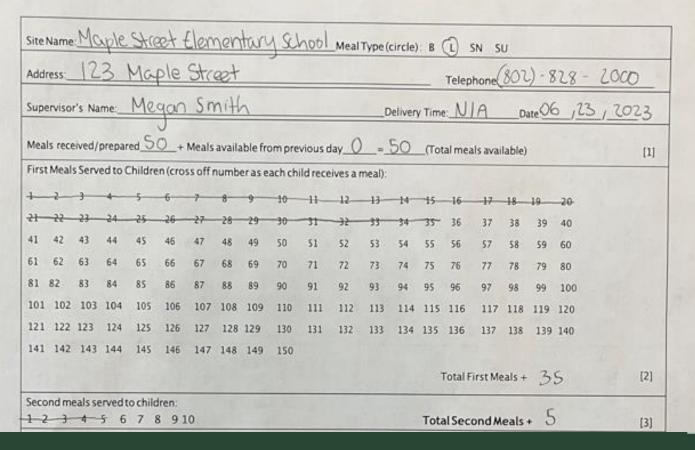
Daily Meal Count Form



- Only the total number was circled.
- The individual numbers were not hashed.

Example of Incorrectly Completed Daily Meal Count Sheet 2

Daily Meal Count Form



The numbers were lined through, the individual numbers were not hashed.



Example of Correctly Completed Daily Meal Count Sheet

Daily Meal Count Form

Site	Nan	ne:	Mo	ple	Stre	zet E	ler	ient	ary	Sch	100	_Meal	Type (c	ircle):	В	C) s	n SI	J				
						le s			J										2)-	828	- 2	000
Supe	ervis	or'	s Nai	me:	Me	2gor	Sn	nith	1				D	elivery	Time	: N1	A	D	ate.0	0 1	23,	2023
						A CONTRACTOR OF THE PARTY OF TH				om prev	Marin II											[1]
First	Me	als	Serve	d to (Childre	n (cros	s off n	umbe	erase	ach chi	ld rece	ives a r	neal):									
y	Z		3	A	8	8	7	6	6	1,6	V	12'	13	14	16	16	Vi	28	19	20		
2/	22		23/	24	2,5	26	27	28	29/	/30	31	32	33	3A	36	36	37	38	39	40		
41	42		43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60		
61	62		63	64	65	66	67	68	69	70 90	71	72	73	74	75	76	77	78	79	80		
81	82		83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100		
101	10	12	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120		
121	12	2	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140		
141	14	12	143	144	145	146	147	148	149	150												
Total First Meals + 35														[2]								
,					to child																	
1 2 3 A 8 6 7 8 9 10 Total Second Meals + 5												[3]										

•The individual numbers are correctly hashed through.



Monthly Consolidated Meal Count Sheets

 Sites may use an Excel document or paper sheet to record and tally meals served for the month.

 Sites may also enter their daily meal counts into their electronic POS system to generate a report showing the meals served for the month.

Adult Meals

- Meals served to adults are not eligible for reimbursement.
- •However, these meals must be tracked and reported on the Claim for Reimbursement.
- Program Adult Meals are an allowable cost.
- Non-Program Adult Meals are not an allowable cost.
 - Can cover the cost with other non-federal funds
 - Can sell meals to non-program adults. Must charge enough to cover the cost of the meal.
 - If you indicate in your Budget that you are providing Non-Program Adult Meals, you will need to enter the price or other source of funds.



Congregate Feeding Requirement

- •Unless otherwise approved to operate non-congregate meal service, must ensure that all meals are consumed on-site.
 - This is for food safety and to ensure the child is the one benefitting from the meal.
 - Meals taken off-site are not eligible for reimbursement.
 - Can take fruit or vegetable or grain with them. This is up to sponsor discretion.

USDA Foods

USDA Foods Contact

Cheryl Rogers

Grants Specialist

(802)-828-1590

cheryl.rogers@vermont.gov



USDA Foods Eligibility

•Self-preparation sponsors, sponsors that contracts with a School Food Authority, or School Food Authorities that contract with their FSMC from the school year are eligible to receive USDA Foods

USDA Foods in Summer 2024

• "Does this Sponsor wish to receive USDA Foods/Commodities? (Eligibility is determined by state agency.)" in the General Questions tab of the Organization Application.

USDA Foods Allocation

- Food will be allocated in June. If you are a new, non-SFA sponsor you will have to set up an account with Performance Food Group (formerly Reinhart) and in FFAVORS
- Allocation is based on meals served in the previous summer or if you are a new sponsor, this figure is estimated.
- If your Fair Share Allocation is more than \$150, you have the option to do DoD Fresh. DoD Fresh is first come first serve. Requests over a ¼ of the total amount will not be considered. The deadline to receive DoD Fresh is September 30th.

USDA Foods Options

- If it is less than \$150, you can receive request foods off of the USDA Foods Extras Request Form.
- USDA Foods Direct Delivery cases will incur a delivery fee.
- \$2.85 per case or \$70 per delivery, whichever is higher.
- Schools can combine their summer and school delivery.
- USDA Foods Direct Delivery Request Form
 - No limit to how much you may order, but orders are delivered on the next truck headed to your site, must have on-site storage available.



USDA Foods Database

- <u>USDA Foods Database</u>, includes component contribution and manufacturer-specific allergen information
- Formerly, <u>USDA Foods Fact Sheets</u>

USDA Foods and Food Service Management Company (FSMC)

- Contract management
- Use what it is available to you

Meal Pattern

Meal Pattern Options for School Food Authority (SFA) Sponsors

- •SFA sponsors may choose to follow the SFSP meal pattern or continue following the school year NSLP, SBP, and NSLP Afterschool Snack Service meal patterns.
- •In the Site Type and Eligibility tab of Site Application, indicate this choice
- SFSP Meal Pattern

SFSP vs. SNP Meal Pattern

Notable Differences	SNP	SFSP
Milk	Unflavored fat-free or 1% milk, flavored fat-free milk Must offer milk choice	Plain or flavored whole milk, low- fat milk, skim milk, and buttermilk No milk choice required
Grains	Must be whole grain-rich	Whole-grain or enriched, or cereals can be fortified
Grain-Based Desserts (GBD)	Up to 2 ounces of GBD at lunch per week	Only allowed at snack and breakfast
Meat/Meat Alternate (M/MA) at Lunch	Daily serving size depends on age/grade group	Always 2-ounce m/ma equivalent at lunch/supper
Vegetable Subgroups	Required	Not required
½ Cup Fruit or Vegetable with OVS meal	Required	Not required



Larger Portions for 12 through 18

- Sponsors have the option to serve more than the minimum serving sizes
- There is no maximum serving size in the SFSP Meal Pattern
- Sponsors have the option to serve CACFP adult meal pattern portion sizes
- CACFP Adult Meal Pattern
- Meals containing larger portion sizes are reimbursed the same amount as regular meals
- •In the Site Type and Eligibility tab of the Site Application, "Will the site be serving CACFP adult meal pattern portion sizes to children 12-18?"



Smaller Portions for 6 and under

- Sponsors have the option to serve CACFP-size portions to children 6 and under
- CACFP Child Meal Pattern
- •In the Site Type and Eligibility tab of the Site Application, "Will the site be serving CACFP-sized portions for children 6 and under?"



Infant Meals

•In the Site Type and Eligibility tab of the Site Application, "Will your site be serving children under one year of age?" If yes, must indicate your plan and must follow the <u>Infant Meal Pattern</u>.

Family Style Meal Service

- Only allowed at camps and closed-enrolled sites
- Indicate use in meal service system question in Site Operation tab in Site Application
- <u>FNS Instruction 783-3 Rev. 1</u> Family Style Meal Service in the Summer Food Service Program
- Family Style Dining Tips
- Family Style Meal Service with Children in the CACFP



Serve or Offer vs. Serve (OVS)

Serve

- All meal components must be taken.
- You can offer entrée choices within the 'Serve'.

Offer vs. Serve (OVS)

- All meal components must be offered, but some can be declined.
- Offer vs. Serve (OVS) could be implemented through a preorder system.

OVS for Non-SFA Sponsors

- •The <u>Final Rule</u> limits OVS to SFA sponsors, however we received a waiver to allow non-SFA sponsors to continue to implement OVS. This is only for congregate meal service. It is not allowed for non-SFA sponsors operating non-congregate meal service.
- •We are going to track waiver use outside of the Harvest Child Nutrition System.
- •Sponsors must watch the Brighton Training Group <u>Course</u> Planning and Administering the SFSP 2023 (VTAOE-178) Lesson 2 Meal Service Planning, specifically Topic 2, and then email the State agency to request the waiver.

Unitized Meals

- All meal components are packaged, delivered, and served as a unit. Milk may be packaged and provided separately, but must be served with the meal and only such complete meals are reimbursable.
- Sponsors contracting for meals must provide unitized meals or upload a <u>Unitized Meal Requirement Waiver</u> in the Site Operation tab of the Site Application.



Delivery Receipts

- •Satellite sites and vended programs which deliver meals must support the number of meals delivered with a signed delivery receipt.
- Delivery Receipt for Vended Satellite Meal Service
- This is to support the proper amount of food was prepared and delivered as agreement in the FSMC contract or vendor agreement
- Delivery Receipt for Satellite Meal Service

Meal Pattern Components

- Milk
- Vegetables and/or Fruit
 - Juice must be 100%
- Grains
 - Whole-grain or enriched, or cereals can be fortified.
- Meat/Meat Alternate (M/MA)
 - Nuts and seeds may fulfill the whole component requirement for snack, but no more than ½ of the requirement for lunch/supper.



Milk

- •The serving size of milk is always 8 ounces.
- No fat-content restrictions.
- Milk can be flavored or unflavored.
- •Milk must be provided at breakfast, lunch, and supper. If operating OVS, children may decline the milk.
- No milk choice requirements, as is required in the school year.



Unavailability of Milk

•Per 7 CFR 225.16(f)(6) if emergency situations prevent a sponsor from receiving a sufficient supply of milk, the State agency may approve the service of meals without milk during that time.

Breakfast

- •Milk- 8 ounces/1 cup
- •Vegetables and/or Fruit 1/2 cup
- •Grains-1 serving
- Meat/Meat Alternate is optional at breakfast
 - meat, fish, cheese: 1 ounce
 - nut butters: 1 ounce/2 tablespoons



OVS at Breakfast

- •A minimum of four required food items must be offered.
- Three must be from the required components (fruit/vegetable, milk, grain).
- •The fourth may be a different item from the fruit/vegetable or grain components or a meat/meat alternate.
- •Children must select three of the four required food items to have a reimbursable meal. The three items must be <u>different</u>.

"Different"

Unlike the School Breakfast Program...

- A large item cannot count as two
- Two pieces of toast are not two items
- At breakfast and lunch/supper: apple juice and apples are not different



Lunch/Supper

- •Milk- 8 ounces/1 cup
- •Vegetables and/or Fruit:

3/4 cup total, 1/8 is minimum serving size

- 1 vegetable and a different vegetable
- 1 fruit and a different fruit
- fruit and vegetable
- •up to ½ of the total requirement may be met with 100% juice



Salad

- Fruit salad only counts as 1 fruit
- •Garden salad only counts as 1 vegetable

Grains at Lunch and Supper

-Bread - 1 serving

-Tortillas – 1 serving

-Pasta or rice- ½ cup cooked



Meat/Meat Alternate at Lunch and Supper

- -Meat, poultry, fish, cheese 2 ounces
- -Eggs 1 large egg
- -Nut Butters 4 tablespoons; this is **a lot** of nut butter, often sponsors will offer 2 tablespoons and include a 1-ounce cheese stick.
- -Yogurt 8 ounces/1 cup

Remember, it is always 2 ounces of m/ma at lunch/supper!



Tofu

- Per <u>SP 02-2024</u>, <u>CACFP 02-2024</u>, <u>SFSP 02-2024</u> <u>Revised</u>: <u>Crediting Tofu and Soy Products in the School Meals Programs</u>, <u>Child and Adult Care Food Program</u>, and <u>Summer Food Service Program</u>, tofu is now creditable in SFSP!
- It must be commercially prepared.
- •2.2 ounces by weight or ¼ cup by volume provides 1 ounce meat/meat alternate



OVS at Lunch/Supper

- Must offer 5 items from the 4 components
- Child must select 3 components for a reimbursable meal.
- •For example, if the child is offered a turkey sandwich, watermelon, carrot sticks, and milk and they choose watermelon, carrot sticks, and milk, this is not a reimbursable meal because watermelon and carrots sticks are from the same component. If they choose the sandwich and the milk, they have a reimbursable meal because they have the m/ma from the turkey, the grain from the sandwich, and the milk.

Snack - Two Different Components

Milk - 8 ounces/1 cup

Vegetable and/or Fruit – 3/4 cup

Grains-1 serving

Bread: 1 serving

Meat/Meat Alternate - 1 ounce

- Meat and cheese 1 ounce
- Nut butter 2 tablespoons
- Nuts-1 ounce
- Yogurt- 4 ounces/ ½ cup



Snack

- Snack cannot be just a milk and juice
- •This is a "liquid" snack and kids need something more substantial

•No OVS at snack.



Grain-Based Desserts (GBD)

- Defined by the 3 and 4 superscripts on the <u>Grain Crediting Chart</u>
- •Includes foods like pies, cookies, and cakes
- Are only allowed at snack and breakfast
- Not allowed at lunch and supper

Additional Foods

- •Foods that may not be served as part of the reimbursable meal are not allowable costs.
- •Condiments served with a creditable food are exempt from this restriction.
- •Sites wishing to serve additional foods, that do not meet SFSP meal pattern standards, must use non-Program funds.

Chips

- •Pretzels and chips made from wholegrain or enriched meal or flour can be used to meet the grain requirement.
- •Chips, such as potato chips, that do not meet the meal pattern requirements cannot be purchased with SFSP funds.



Popcorn

- •Per <u>SP 23-2019</u>, <u>CACFP 10-2019</u>, <u>SFSP 09-2019</u> Crediting Popcorn in the Child Nutrition Programs, popcorn can credit towards the grain component.
- •3 cups of popped popcorn credits as 1 serving of grain.



Crediting

- •Dried fruit and raw leafy greens credit as is.
- •¼ cup of dried fruit = ¼ cup of fruit
- •½ cup of raw leafy greens = ½ cup of vegetable

Crediting Resources

- Food Buying Guide
- Using the Food Buying Guide in CNP
- Exhibit A: Grain Requirements for Child Nutrition Programs

Meal Pattern Documentation

- Production Records are highly recommended, but not required
- Use standardized recipes
- Maintain receipts and invoices
- •Use products with Child Nutrition (CN) labels or Product Formulation Statements (PFS) as appropriate
 - The USDA maintains a <u>CN Label Verification Report</u> which is a list of CN-labeled products.



Examples of CN-Labels





Examples of Product Formulation Statements

	Description of Food Buying Guide		Ounces per Raw Po Ingredient	rtion of C	reditable	Multiply	FBG Yield	Creditable Amount *
Chicken	BONELESS CHICKEN W/SKIN IN NAT PROPORTION	URAL	0.3862820			x	0.70	0.27039740
Total								0.27039740
the prod scribed De	ate Protein Product (APP) hart contains APP, please fill out the chart belo in Attachment A for each APP used. escription of APP, Manufacture's name, dCode Number		ine the creditable amount Ounces Dry APP Per Portion	of APP. If Multiply	APP is used, y % of Protein As-Is *		e by	Creditable Amour
	ROFAM 981, ADM	Isolate	0.027352	x	86	+ by	8	0.1306817
otal Cr	editable APP Amount							0.1306817
otal wei	ight (per portion) of product as purchased	3.45 oz.						
		2.00 oz.						
eminde	r. Total creditable amount cannot count for mo	re than the t	otal weight of product.)					
	at the above information is true and correct an t meat/meat alternate when prepared according			above prod	lact (ready for	serving) o	ontains	2.00 ounces of
quivalen I further o		to direction	S	-				
quivalen further of	t meat/meat alternate when prepared according sertify that any APP used in the product confo	to direction	S	-		ts 210, 22		
quivalen further o lemonstr	rment/ment alternate when prepared according certify that any APP used in the product confor ated by the attached supplier documentation.	to direction	S	-	nus (7 CFR Par	ts 210, 22		
quivelen further of lemonstr Kavu lignature	treast beart alternate when prepared a coording centrily that any APP used in the product confinently that any APP used in the product confinent by the attacked supplier documentation. The state of the attacked supplier documentation. The state of the attacked supplier documentation.	to direction	S	-	nns (7 CFR Par Director	Nutrition	0, 225,	

Tyson Product Formulation Statement

Formulation Statement for Documenting Grains in School										
	Name: FC, Whole Grain Breade charer: Tyson Foods, INC	d CKN Breast Chunk-Shaped Patties Case/Pack/Count/	with RMT Portion/Size: / 250 / 5 (0.69 oz.) Chunk	Code No: 002378-0928						
II. Does III. Use: to determings standard	o SP 30-2012 Grain Requirements the product contain non-credital Policy Memorandum SP 30-2012 mine if the product fits into Grou of grain component based on cre	in-Rich Criteria? Yes X No; for the National School Lunch Proble grains? Yes X No Hon P. Grain Requirements for the Nation ps A-G, Group H or Group I (Ple ditable grains. Groups A-G use the ro age and Group I is reporting	gram and School Breakfast Program) s many grams: 0.31 g snal School Lunch Program and School Bi sze be aware that different methodologies; a standard of 16 grains creditable grain per	re applied to calculate						
	Description of Food Buying Guide	Portion Size of Product as Purchased	Weight of one ounce equivalent as listed 30-2012	in SP Creditable						
Grains	BATTER TYPE COATING	1.00	1.00	1.00						
Total C	reditable Amount			1.0000000						
Total cri	I further certify that non-creditable	tion) 1.00 oz. s true and correct and that a 2.45 ours grains are not above the 0.24 oz eq. p.	Director-Nutritio							
Signatur			Title							
Karen S Printed 3	hank, MS, RDN		7/7/2016 Date	(479) 290-3659 Phone Number						

RFS#L3494 This is a Child Nutrition equivalent statement. This item does not have a Child Nutrition label Product Formulation Statement (Product Analysis) for Meat/Meat Alternate (M/MA) Products Product Name: GC RED SOD OR TKY BRST Code No.: 831702 Manufacturer: <u>Jennie-O Turkey Store</u>

I. Meat/Meat Alternate Case/Pack/Count/Portion/Size: 2/7-9 LB Please fill out the chart below to determine the creditable amount of Meat/Meat Alternate Description of Creditable Ounces per Raw Ingredients per Portion of Creditable Food Buying Guide Ingredient **Guide Yield** 2.8634 Turkey Boneless Fresh or Frozen 2.0044 w/ Skin in Natural Proportions A. Total Creditable Amount *Creditable Amount - Multiply ounces per raw portion of creditable ingredient by the Food Buying Guide yield.

II. Alternate Protein Product (APP) If the product contains APP please fill out the chart below to determine the creditable amount of APP. If APP is used, you must provide documentation as described in Attachment A for each APP used. Description of APP, % of Creditable manufacture's name Dry APP Protein 18** Amount APP*** and code number Per Portion As-Is* ÷ by 18 B Total Creditable Amount C. TOTAL CREDITABLE AMOUNT (A + B rounded down to nearest ¼ oz) Percent of Protein As-Is is provided on the attached APP documentation. **18 is the percent of protein when fully hydrated. "Creditable amount of APP equals ounces of Dry APP multiplied by the percent of protein as-is divided by 18. Total Creditable Amount must be rounded down to the nearest 0.25oz (1.49 would round down to 1.25 oz meat equivalent). Do not round up. If you are crediting both M/MA and APP, you do not need to round down in box A until after you have added the creditable APP amount from box B. Total weight (per portion) of product as purchased 2.98 oz Total creditable amount of product (per portion) 2.0 oz. (Reminder: Total creditable amount cannot count for more than the total weight of product) I certify that the above information is true and correct and that a <u>2.98</u> ounce serving of the above product (ready for serving) contains <u>2.0</u> ounces of equivalent meat/meat alternate when prepared according to directions. I further certify that any APP used in the product conforms to the Food and Nutrition Service Regulations (7 CFR Parts 210, 220, 225, 226, Appendix A) as demonstrated by the attached supplier documentation.. andlald VP Foodservice Jennie-O Turkey Store Sales, LLC 2505 Willmar Avenue SW Willmar, MN 56201 (320) 235-2622



Recipe Resources

- Vermont New School Cuisine Cookbook : Nutritious and Seasonal Recipes for School Cooks by School Cooks
- Fresh From the Farm: The Massachusetts Farm to School Cookbook
- USDA Standardized Recipes for Schools
- Washington State Schools "Scratch Cooking" Recipe Book
- Team Nutrition



Leftovers, Donations, and Share Tables

- All sponsors must plan, prepare, and order meals with the objective of providing one meal per child at each meal service.
- Second meals are allowed, but please see the "Serving Second Meals" slide for more information.
- Sponsors should regularly monitor and compare site reports on the number of meals served to reduce waste and cost.
- Additionally, all alternatives permitted by Program regulations and State and local health and sanitation codes should be exhausted before discarding food.
- •When it is not feasible to reuse leftovers or store food, FNS encourages sponsors to consider donating it to non-profit organizations working to address hunger in the community, such as homeless shelters, food banks, and food pantries. The Bill Emerson Good Samaritan Food Donation Act protects donations to non-profit organizations. These meals cannot be claimed for reimbursement.
- SP 11-2012, CACFP 05-2012, SFSP 07-2012 Guidance on the Food Donation Program in Child Nutrition Program
- Vermont Guidance for Food Donation: Businesses and Institutions
- <u>SP 41-2016, CACFP 13-2016, SFSP 15-2016</u> The Use of Share Tables in Child Nutrition Programs
- Vermont Food Sharing Tables-Guidance for Schools



Inventory

- Sponsors must conduct inventory of food and non-food supplies at the beginning and end of operation
 - It must include a list of the items and assigned values
- •Sponsors with fixed-price FSMC contracts do not have to conduct inventory as such, but should manage the contract by ensuring other assets owned by the sponsor are accounted for

Food at the End of School and End of Summer

Food leftover at the end of SFSP operation may be put toward operation of other Child Nutrition Programs or given to registered 501(c)(3) organizations, like food shelves.

Open Sites: How many meals to prepare?

- Was it a site last year? Look at ADA.
- •How many kids live in the town; proximity to the site? Can they easily walk or bike?
- •Any programming taking place, summer school, recreation?
- •Prep a few extra, make something that can be re-used the next day if there are leftovers.
- •Base it on first few days!



Food Safety and Sanitation

Follow State and Local Health Standards

- •Must meet applicable State and local health standards during all aspects of food receiving, storage, and preparation, service of meals, and the handling of leftovers.
- Vermont Food Code

Food Safety Training

- <u>Foodservice Employee Training Videos</u> from the Iowa State University Extension and Outreach
- Institute of Child Nutrition Food Safety for Summer Meals
- USDA FNS Office of Food Safety
- Videos: Food Safety Flashes
- VT Child Nutrition Improving Food Safety at SFSP Sites

Sanitation

- Have a plan for trash removal, recycling, and composting
- Use gloves while preparing and/or serving meals
- Use proper serving utensils, such as tongs for ready to eat fruit, including apples
- Wear proper hair restraints, such as hats or hairnets, while preparing and serving meals
- Be temperature aware.
 - Keep cold food COLD and hot food HOT.
 - Map your routes carefully. Take the temperature of food when it leaves and the temperature again when it arrives.



Keeping it Cold or Hot

- •With coolers, use enough ice packs to keep the food cold. Put food right back in coolers after meal service. Don't take everything out of the coolers until it is needed. Leave the lid closed during service.
- •Clean out your coolers regularly. Think of them as any other utensil that you would wash.
- Use warmers, restaurant heating bags, and do not open them unnecessarily.



Temperatures

- Monitor and record temperatures for:
 - All cold storage units, including walk-in refrigerators, walk-in freezers, chest freezers, milk coolers, and standing refrigerators
 - Dishwashers
 - Cooked foods, at least after cook, start of service and end of service recommended



Procurement

Procurement Questions

Please direct procurement questions to:

Shawna Coutu Grants Management Specialist 802-828-2093

Shawna.Coutu@vermont.gov

Procurement 101 Training



Methods of Procurement

Informal Procurement Methods

- Micro-purchase: \$0-\$50,000
 - Spread out equitably
 - No solicitation of price quotes, if the Sponsor considers the price reasonable.
- Small Purchase: \$50,001-\$250,000
 - Price or rate quotations must be obtained from an adequate number of sources.

Sponsors who are a Public School **MUST** follow the guidelines of the Vermont Bid Law **16 V.S.A. § 559**: https://legislature.vermont.gov/statutes/section/16/009/00559



Methods of Procurement, Cont.

Sponsors contracting with a Food Service
Management Company must use the VT AOE's
Contract Template:
https://education.vermont.
gov/documents/edunutrition-FSMC-contracttemplate

Formal Procurement Methods

- Invitation For Bid (IFB)
 - Used when price is the only factor
 - Must choose lowest cost
- Request for Proposal (RFP)
 - Used when there are multiple factors being evaluated
 - Must have a written method of evaluation



Procurement Documentation

- A Procurement Documentation Form must be completed for each purchase/contract regardless of method used.
 - Consider the volume of products you are purchasing and consolidate procurements when possible
 - Example, if you estimate you are going to buy 100 cases of apples throughout the year at \$50 per case, for a total of \$5,000, do one micro-purchase procurement documentation form. It doesn't matter if you receive the entire amount at once or not.
- VASBO Template Procurement Documentation Form
- Keep all documentation of quotes for Small Purchases.
 - If the quotes are phone calls, write down the date of the call and price for each vendor you called.
- Make sure to check SAM.gov to ensure vendor is not barred from receiving federal funds.



Written Procurement Procedures

- •Sponsors must have a written procurement plan on how to handle purchasing, outlining the applicable method(s) of procurement.
 - -VASBO Template Procedure

- •The procurement plan must include Conflicts of Interest and Codes of Conduct.
 - -VASBO Template Conflict of Interest



Annual Procurement Threshold Determination

- SFSP Annual Procurement Threshold Determinations
- •If written Procurement Procedures are updated annually, this form does not need to be completed.

Buy American Provision

- Not required in SFSP unless you also operate NSLP, so SFA sponsors must follow it.
- •SFAs must, to the maximum extent practicable, purchase domestic commodities or products.
- Include the Buy American Provision in procurement solicitations and contracts.
- •This promotes the dual nature of the programs, which is to provide children with healthy meals and to support American agriculture.



Buy American Continued

"Domestic" is a product produced in the United States and is processed in the United States substantially using agricultural commodities that are produced in the United States. Products from Guam, American Samoa, Virgin Islands, Puerto Rico, and the Northern Mariana Islands are allowed under this provision as US territories.

"Substantially" means that over 51% of the final processed product consists of agricultural commodities that were grown domestically. The provision should be included in bid specifications to ensure compliance.



Buy American Provision Exceptions

There are two exceptions which allow the purchase of foreign products.

- •Availability: when the product is not produced or manufactured in the U.S. in sufficient and reasonable available quantities of a satisfactory quality.
 - Example: There are no domestic bananas available. You may continue to serve foreign bananas.
- •Cost: the cost of a U.S. product is significantly higher than the cost of a comparable foreign product. "Significantly" is not federally defined, but it is a best practice that it be defined by the SFA within its required written procurement procedures.
- Buy American Provision Exception Sheet



Minority Businesses

Per 7 CFR 225.17(d) The State agency shall ensure each sponsor is aware of the following practices specified in 2 CFR Part 200, subpart D and USDA implementing regulations 2 CFR part 400 and part 415, as applicable with respect to minority business enterprises:

- Include these businesses on solicitation lists.
- •Solicit these businesses whenever they are potential sources.
- •When economically feasible, divide requirements into smaller tasks or quantities for maximum participation.
- Establish schedules to assist them with meeting deadlines.
- •Use the Small Business Administration and the Office of Minority Business Enterprise of the Department of Commerce as required. (7 CFR Part 225.17(d))
- •Vermont Agency of Administration: Buildings and General Services maintains <u>a list</u> of Minority and Women Owned Business Enterprises



Food Service Management Companies (FSMC)

Food Service Management Companies (FSMC) Contact

Conor Floyd

Grants Program Manager

802-828-0310

conor.floyd@vermont.gov



Payment Structure

- •For SFSP, the sponsor is responsible for paying the FSMC for the number of meals delivered/prepared as opposed to the number of meals served.
- •The sponsor must try to be accurate as possible in determining the number of meals for the FSMC to prepare.
- •All FSMC contracts are fixed price per meal contracts.

Procuring FSMC Services

- If you are an SFA that operates NSLP, you may have the same FSMC manage your SFSP if SFSP was included in the original bid
- •If only operate SFSP, then you will need to go out to bid to obtain FSMC services. You should plan to begin the bidding process **two months** prior to when you need the contract to begin
- Reach out to conor.floyd@vermont.gov

Procuring FSMC Services Cont.

- •If you do not properly procure FSMC services, all payments made to your FSMC will be deemed unallowable costs and you will need to pay those costs using non-federal funds
- •Instructions for bidding for a Food Service Management Company contract as a SFSP Sponsor are on the AOE website.

Training

Sponsor Training

- At least one representative from the sponsor organization must participate in the annual required sponsor training from the State agency.
- FSMC employees are welcome, but cannot count as the sponsor representative.
- This annual training is being recorded to view at an alternative time. The registration link can be used to access the recording.
- Must ensure everyone else involved in the program receives SFSP training and Civil Rights training, prior to undertaking program duties.



Application Packet Training Tab

- In the Training tab of the Organization Application:
 - indicate that someone from the sponsor-level has received training.
 - indicate the name(s) of person(s) responsible for conducting training sessions for staff



Training Resources

- Summer Meals Sponsor Training 2024 Recorded Webinar
- In <u>Administrative Guide for SFSP Sponsors</u>
 - "Training Checklist for Administrative Staff" on page 175
 - "Training Checklist for Site Staff" on page 177



Personnel Training

- Sponsors must provide training for anyone involved in any program operations.
- Training must include:
 - Program Overview for all employees/volunteers
 - Meal Pattern Requirements for employees/volunteers preparing meals
 - Point of Service (POS) meal counting for employees/volunteers responsible for the meal count
 - Food Safety and Sanitation for all employees/volunteers
 - <u>Civil Rights Training</u> for all employees/volunteers (if already taken for this calendar year, do not need to take again)
 - Program Monitors must understand all requirements
 - Logistical information and sponsor specifics- such as the plan for handling leftovers, whether a fruit or vegetable or grain can be taken off-site, paperwork collection and retention process, etc.
- Staff training must be documented; through sign-in sheets or certificates.



Additional Training Opportunities

Brighton SFSP Training has 9 training modules:

- SFSP Annual Refresher
- Planning and Administering the SFSP
- Supporting SFSP Recordkeeping Excellence
- Exploring the Purchasing of Meals for SFSP
- Budgeting for SFSP Success
- Promoting and Marketing the Summer Meals Program
- Improving Food Safety at SFSP Sites
- Boosting Menu Appeal in the SFSP
- SFSP Meal Planning for Summer Success



Sponsor Monitoring

Sponsor Monitors

- Monitoring must be conducted by a sponsor-level representative and cannot be an FSMC employee.
- •Must be different than the SFSP Director and not the Site Supervisor for the site receiving the review. This is an important separation of duties.
- Must be trained on program requirements.

Required Sponsor Monitoring

- Pre-Operational Review (if applicable)
- •First Two Weeks Review (if applicable)
- Site Review

Pre-Operational Review

- •Must be completed prior to site operation for all new sites, existing sites new to non-congregate meal service (even if it operated as a congregate site in the previous summer), or problem sites.
- •New sites are any sites that did not operate in the previous year. Problem sites can be determined by the State agency, such as based on findings from a previous year review, or by a sponsor.
- SFSP Pre-Operational Review Form Summer 2024



First Two Weeks Review

- •Must be completed prior to site operation for all new sites, existing sites new to non-congregate meal service (even if it operated as a congregate site in the previous summer), or problem sites.
- •If your site is an existing site in good standing, you may request a waiver of the First Two Weeks Review, in the question "Are you requesting a waiver for the First Two Weeks Visit?" in the Site Operation tab of the Site Application.
- •SFSP First Two Weeks Review Form Summer 2024



Site Review

- •This review must be conducted within the first 4 weeks of site operation for all sites.
- •SFSP Site Review Form Summer 2024

Race and Ethnicity Data Form

- SFSP Race and Ethnicity Data Form
- This form must be completed once during operation for all sites, except residential camps must complete each session.

 Per <u>CACFP 11-2021</u>, <u>SFSP 07-2021</u> Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Recission, Race and Ethnicity Data cannot be collected by visual observation.



Race and Ethnicity Data Collection

For SFA sponsors:

 Please use the data that is collected by the registrar of the SFA when students enroll in school for school sites and for non-school sites, use the school in that area.

For non-profit organization sponsors:

The State agency will provide the information from the local SFA.

For residential and non-residential camps:

 Please use the information provided on the back of the meal applications or if getting F&R information from the local SFAs, the State agency can provide the race and ethnicity information.



Administrative Reviews

Sponsor and Site Selection

- Reviews will be conducted for new sponsors, sponsors who experienced significant problems in summer 2023, and sponsors up for their 3-year review.
- We will observe one meal service at 1 site if you have 1 to 10 sites, 2 sites if you have 11 to 20 sites, and 3 sites if you have 21 to 30.

Site Selection

- •Sites will be selected based on a number of criteria per 7 CFR 225.7(e)(5), including:
- •If rural, type of meal service, congregate vs. non-congregate, non-congregate meal service will be given priority
- Maximum number of meals approved to serve
- Method of obtaining meals (self-preparation vs. vended)
- Last time they were reviewed by the State agency
- Site type (open, closed-enrolled, camp)
- •Type of physical location (school vs. non-school, etc.)
- Rural or urban designation
- •If non-congregate, meal distribution method (meal pick-up, delivery)
- Affiliated or unaffiliated
- Recommendations from the sponsor
- •Findings of other program reviews or audits
- Indicator of any potential error in meal counts (suspicious meal counts or similar numbers from day to day)
- Problems in the prior year



2024 Reviews

 Coming Soon "SFSP Administrative Review Overview Summer 2024"

Sponsor Reviews in 2024

This is the list of sponsors up for their 3-year cycle. This list is subject to change.

Addison Central School District
Bennington-Rutland Supervisory Union
Bethany Birches Camp
Boys & Girls Club of Rutland County
Colchester Town School District
Essex North Supervisory Union
Green Mountain Farm to School
Maple Run USD
New Hope Bible Church & Ministries, Inc.
Orleans Central Supervisory Union
Orleans Southwest Supervisory Union
Rutland Northeast Supervisory Union
Springfield Town School District
Washington Central Unified Union School District
Windham Southwest Supervisory Union
Winooski School District



Paperwork Reviewed 1

- Inventory
- Site eligibility documentation for camps
- Menu
- Production records (highly recommended, but not required in summer), recipes, CN-Labels and Product Formulation Statements (PFS)
- Invoices/receipts/documentation of food costs
- Daily Meal Count sheets
- Monthly Consolidated Meal Counts used for claims for reimbursement
- Delivery receipts for vended and satellite sites



Paperwork Reviewed 2

- Pre-operational review form (if applicable)
- •First two week review form (if applicable)
- Site Review/"4 week" Review Form
- Race and Ethnicity Data Form
- Documentation of staff training
- Employee time attributed to the program
- Relevant procurement documents



Paperwork Reviewed 3

- Civil Rights Complaint Procedure
- Copy of most recent Health Inspection Report (if applicable) and picture of it posted
- Copies of cold storage, hot food, and dishwasher temperatures
- Additional information requested if meals prepared at production kitchen

Common Review Findings

- Lack of training and documentation of the training
- Not updating Site Application(s) to reflect actual operation
- Non-discrimination statement missing, particularly from program webpage
- Insufficient meat/meat alternate (M/MA) amount
- Required reviews not completed and/or thoroughly documented
- Food safety and sanitation violations
- Meal count sheets not filled out thoroughly or completely
- Meals not consumed on site, (unless approved to operate noncongregate meal service)



Meal Disallowances

- Missing and/or inadequate components
- Meals consumed off-site (unless approved to operate non-congregate meal service)
- Non-unitized for vended/FSMC meals (without unitized-meal waiver)
- Served to adults, but included in count of reimbursable meals
- Meal count documentation does not support Claim for Reimbursement
- •If fiscal action is assessed, sponsors will have the right to submit an appeal, refer to the <u>SFSP Appeals Process</u>. Sponsors will receive an email from Harvest Child Nutrition System with the amount of fiscal action and the link to this procedure.



Review Report & Corrective Action

- •After the review, you will receive a write up of the findings and the expected corrective action and documentation to submit, if applicable.
- Once any applicable corrective action has been submitted and assessed, you will receive a closure email.
- •*Note: SFSP is a very short program so sometimes corrective action will be to implement changes for the following summer.



Serious Deficiency (SD) Procedure

Proposed Rule for Serious Deficiency Process in the CACFP and SFSP

 Serious Deficiency Process in the Child and Adult Food Care Food Program an Summer Food Service Program Proposed Rule

Summary of the Proposed SD Rule

- •The Serious Deficiency process provides a systematic way for state agencies and sponsors to correct serious management problems, and when that effort fails, protect child nutrition program integrity through due process.
- •USDA proposes to add clarity to the serious deficiency process by defining key terms, establishing a timeline for full correction, and establishing criteria for determining when the serious deficiency process must be implemented.
- •This rulemaking will also address termination for cause and disqualification, implementation of legal requirements for records maintained on individuals on the National Disqualified List, and participation of multi-state sponsoring organizations.



SD Proposed Rule Request for Comments

Written comments must be received on or before May 21, 2024 to be assured of consideration.

- Federal eRulemaking Portal: Go to https://www.regulations.gov. Follow the online instructions for submitting comments.
- Mail: Send comments to: Navneet Kaur Sandhu, Program Integrity and Innovation Division, USDA Food and Nutrition Service, 1320 Braddock Place, Alexandria, VA 22314.

All written comments submitted in response to the provisions of this proposed rule will be included in the record and will be made available to the public. Please be advised that the substance of the comments and the identity of the individuals or entities submitting the comments will be subject to public disclosure. USDA will make the written comments publicly available on the internet via https://www.regulations.gov.



Civil Rights

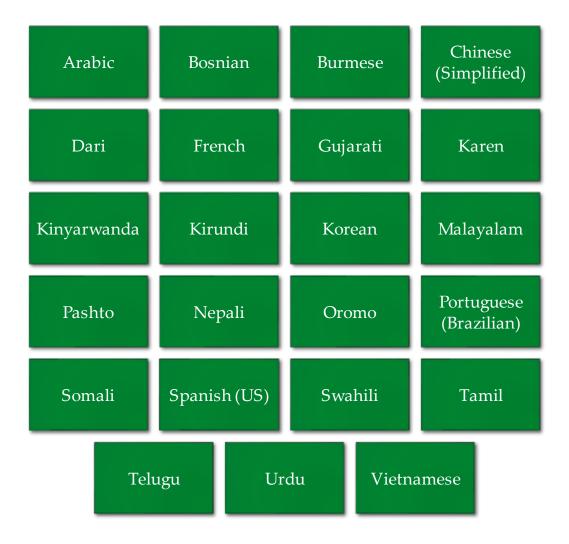
Civil Rights Training

- Everyone involved in program operation and administration must receive annual Civil Rights training.
- They must receive this training prior to their participation in the program.
- If they already received training in the calendar year for participation in School Meals or CACFP, it does not need to be taken again for SFSP.
- This can be accomplished through the <u>Child Nutrition Programs</u> <u>Civil Rights Training PowerPoint</u> or the <u>Child Nutrition Programs</u> <u>Civil Rights Training Recorded Webinar</u>
- Document with names, dates, and signatures through sign-in sheets or certificates.



Translation of SFSP Outreach Statements

<u>Translation of SFSP Outreach Statements</u>





Translation of SFSP Outreach Statements, cont.

Outreach Statements in English:

- Meals are free for children, 18 and under.
- This institution is an equal opportunity provider.
- For meal locations call 2-1-1.
- Free for kids and teens, 18 and under.
- For more information, call 2-1-1 or go to https://www.fns.usda.gov/meals4kids
- Join us for free Summer Meals
- You must take three different items!
- The adult meal price is \$_____.
- Call 2-1-1 or go to <u>https://www.fns.usda.gov/meals4kids</u>
- We offer free, nutritious meals for children, 18 and under.
- We offer free breakfast and lunch.

- There is no pork in this meal.
- We offer vegetarian options.
- We offer pork-free options.
- Milk is part of the meal, but you may decline it.
- Let us know if your child has any allergies.
- This meal is vegetarian.
- We are closed on July 4th.
- There is no beef in this meal.
- We offer beef-free options.

Subrecipient Annual Report (SAR)

Reporting Requirements for Federal Grants

- •Using federal grant dollars in a fiscal year requires that you report the grant name and amount spent to the State of Vermont on a form called the Subrecipient Annual Report (SAR).
- •This report will be sent, through the mail, annually from the Vermont Agency of Administration, Department of Finance and Management.
- •This form must be completed and submitted back to the state within 45 days of the close of your fiscal year.

For more information on the Subrecipient Annual Report

Common Subrecipient Annual Report (SAR) Questions

•The <u>State of Vermont Subrecipient Annual Report</u> is now an online form.



Single Audit Requirement

- •Per 2 CFR §200.500, if your organization expends \$750,000 or more in federal funds in a fiscal year, you must comply with the requirement to have a single or program-specific audit completed for that fiscal year.
- •Single Audits must be completed by a licensed Certified Public Accountant (CPA) and must be uploaded to the <u>Federal Audit Clearinghouse</u> within six (6) months of the close of your fiscal year.



Consequences of Non-Compliance

- •Failure to comply with the requirements of the Subrecipient Annual Report and/or the Single Audit may subject your organization to be considered "high-risk" and subject to increased programmatic and fiscal monitoring by the Vermont Agency of Education.
- •Your organization will also not be eligible for any non-Child Nutrition related state grants/funds while in delinquent status.



For Questions On Completing the Subrecipient Annual Report

Contact:

Statewide Grants Administrators

Vermont Department of Finance & Management

fin.subrecipient@vermont.gov

(802)-828-3201 or (802)-828-1643

Other Aspects of Program Operation

Food Insecurity Resources

- Vermont Foodbank Food Shelf and Meal Site Locator
- •Refer to the Hunger Free Vermont resource: <u>Stretch Your Budget with Vermont Food Programs</u>
- •For information on open meal sites, call 2-1-1, the United Way-run resource hotline, or go to the <u>USDA</u> <u>Meals For Kids Site Finder</u>. All sites listed are open to all children, 18 and under. Any necessary changes to the above information are made on a weekly basis.
- Summer Meals Site Finder Texting Number is 914-342-7744 (previously 97779)



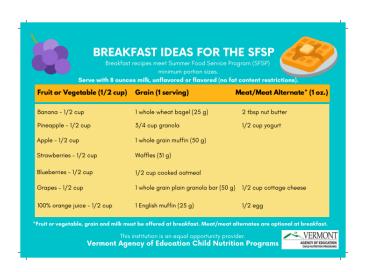
State Level Outreach and Promotion

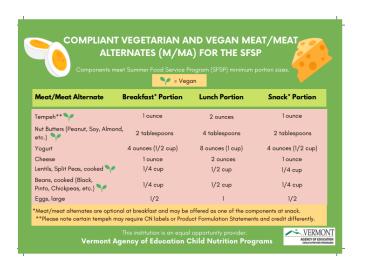
- •We advertise all open meal sites on the national website Meals for Kids Site Finder, and the United Way-run resource hotline Vermont 211, and Hunger Free Vermont website
- •It is extremely important for you to update your Site Applications to reflect actual program operation.



Outreach Materials

- Lawn signs and stakes
- Banners
- Meal Pattern Cards
 - SFSP Breakfast Ideas & SFSP Vegetarian M/MA







Farm to Summer

- Increase the availability of local foods in meals
- Connect with local farmers, farmers' markets
- Gardening and farm-related enrichment activities

Farm to Summer Resources

- NOFA-VT/VT FEED- Lauren Griswold
 - laureng@nofavt.org
 - 802-434-7189
- Vermont Farm to School Network, <u>Regional Support</u>
 <u>Orgs</u>
- New England Dairy & Food Council- Jill Hussels
 - (802)-863-5416
 - jhussels@newenglanddairy.com
- UVM Cooperative Extension
 - https://www.uvm.edu/extension/contact_us_
 - Master Gardener Program



Hunger Free Vermont

Outreach, promotion, and technical assistance

Keely Agan

Child Nutrition Initiatives Specialist kagan@hungerfreevt.org / 802-448-4396

Tim Morgan

Program Data & Child Nutrition Manager tmorgan@hungerfreevt.org / 802-333-0428



Title 16: Education Chapter 027: Transportation and Board Subchapter 002: School Food Programs §1264. Food Program

16 V.S.A. § 1264

- (2) Each school board operating a public school shall offer a summer snack or meals program funded by the Summer Food Service program or the National School Lunch Program for participants in a summer educational or recreational program or camp if:
- (A) at least 50 percent of the students in a school in the district were eligible for free or reduced-price meals under subdivision
 (1) of this subsection for at least one month in the preceding academic year;
- (B) the district operates or funds the summer educational or recreational program or camp; and
- (C) the summer educational or recreational program or camp is offered 15 or more hours per week.



Maintaining Program Integrity

- Site eligibility
- Promotion/advertising
- Serving all children equally
- Ensuring access
- Accurate record keeping
- Conducting required reviews

Requesting Training Certificates

Child Nutrition Certificate Request Form

Record Retention

•All records must be maintained on file for 3 years, plus the current year.

Local rules may require records be maintained longer.



SFSP ListServ

 Make sure you are signed up for the SFSP ListServ with your correct email address

•Please email Marc Grimes at marc.grimes@vermont.gov to sign up

Poll Question

- USDA has rebranded the programs that serve children in the summer time to be called SUN Programs: USDA's Summer Nutrition Programs for Kids.
- SUN Meals: In-person summer meal sites; group summer meal service
- SUN Meals To-Go: To-go or home-delivered meals in certain rural areas



•How do sponsors feel about incorporating these names and logos into our outreach materials, particularly any lawn signs?

Questions?

Jamie Sutter

Child Nutrition Coordinator jamie.sutter@vermont.gov (802)-828-2010

Sarah Bangs
Child Nutrition Coordinator
Sarah.bangs@vermont.gov

(802)-828-2025



Non-Discrimination Statement

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

mail:

U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; or

fax:

(833) 256-1665 or (202) 690-7442; or

email:

Program.Intake@usda.gov

This institution is an equal opportunity provider.

