Summer Food Service Program (SFSP) Summer 2023

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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
- Training
- Sponsor Monitoring
- Administrative Reviews
- Serious Deficiency (SD) Procedure
- Civil Rights
- Subrecipient Annual Report (SAR)
- Other Aspects of Program Operation



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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 Harvest Child Nutrition System.
- Sponsors can be School Food Authorities (SFAs), private non-profit 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 <a>SFSP 01-2014 Sponsors Operating in Multiple States in the Summer Food Service Program, there are specific requirements for multi-state sponsors.



Sites

- 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 FNS Instruction 782-4 Rev. 2 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



End of USDA Broad Waiver Authority

- Congress did not extend USDA's waiver authority. This means no nationwide waivers and no waivers that alter the meal pattern or cost the Federal government more money.
- We can submit state-specific waivers.



Streamlining Requirements and Improving Integrity in the SFSP Final Rule

- Streamlining Program Requirements and Improving Integrity in the SFSP
- Streamlining Requirements and Improving Integrity in the SFSP Final Rule- Comparison Table



Key Changes of the Final Rule

- Must confirm tax exempt status at time of application through documentation
- Statewide press release completed by State agency (SA)
- First Two Weeks Site Review rather than First Week Site Review
- One hour must elapse between the end of one meal service time and the beginning of another meal service time for all sites, except for residential camps
- Area eligible closed-enrolled sites must provide justification as to why they are not open sites
- Non-SFA sponsors must request waiver to implement OVS



Management Plan and Viability, Capability, and Accountability (VCA) Standards

- Note: in Summer 2024, there will be a Management Plan section of the SFSP Application Packet and sponsors will be required to 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



FY2023 Consolidated Appropriations Act

- Consolidated Appropriations Act, 2023
- Established permanent non-congregate meal service and Summer-EBT



Non-Congregate Meal Service

- <u>SFSP 01-2023, SP 05-2023 Implementation Guidance</u>: Summer 2023 Non-Congregate Meal Service in Rural Areas-Revised
- <u>SFSP 07-2023, SP 14-2023 Questions and Answers #2</u>: Summer 2023 Non-Congregate Meal Service in Rural Areas
- Allows sites in rural areas to provide non-congregate meals when there is no congregate meal service available. Different options for area eligible vs. nonarea eligible sites.
- Please see the Non-Congregate Meal Service SFSP Training, that was held on Thursday, April 20th, 2023.



Summer EBT

- EBT stands for Electronic benefit transfer.
- This is a permanent program, similar to P-EBT, that will go into effect for summer 2024 and provide funds to children in the summer.
- More information to come.



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



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



2022 SFSP Reimbursement Rates

Meal	Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep	Urban/Vended
Breakfast	2.6050	2.5550
Lunch/Supper	4.5625	4.4875
AM/PM Snack	1.0775	1.0525



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
- Chittenden, Franklin, and Grand Isle counties are considered urban. The rest of the counties are rural.
- 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 concurrence, is determined to be geographically isolated from urban areas as per "7 CFR 225.2 Definitions *Rural*."



Summer 2023 Rural Flexibility

- In Summer 2023, the following sites may be considered Rural and should indicate that as such in the county question in the Site Application:
 - Alburgh Community Education Center
 - Bellows Free Academy- Fairfax
 - Berkshire Leaps
 - Enosburg Elementary School
 - Enosburg LEAPS
 - Enosburg Library
 - Enosburg Middle/High School
 - Enosburgh Opera House
 - Fairfield Center School
 - Fletcher Elementary School
 - Franklin Elementary School
 - Georgia Elementary and Middle School
 - Grand Isle School
 - Highgate Elementary School
 - Missisquoi Valley Union High School
 - Montgomery Rec Center
 - North Hero School
 - Notch
 - Notch Richford
 - Richford Elementary Leaps
 - Richford High School
 - Swanton Elementary School



County Determination

 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 Facility

 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

- 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.
- Stigma-free, barrier-free method of meal service as it is the site that qualifies, not the individual children.
- Qualification through area eligibility:
 - 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 2023.
- Or if the school reaches 50% or higher in any subsequent month.



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.



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.



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
- Studies show it takes about 3 years for a Summer Meals site to be well-established in a community
- 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:

- 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;
- 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?"



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 reducedprice meals



Area Eligible Closed Enrolled Site Justification

- Beginning in summer 2023, as a State agency, we have to establish criteria for approving area eligible closed enrolled sites to ensure operation does not limit program access.
- "Explain the reason you are operating a closed-enrolled site." Reasons could include limited staff, space, or safety concerns.



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 or operate National School Lunch Program (NSLP) in the Summer



Summer Feeding Options

Summer Food Service Program (SFSP)

- NSLP Seamless Summer Option (SSO)
 - SFAs only
- National School Lunch Program (NSLP) in the Summer
 - 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.
- Must provide activities for the children between meal services.
- Sponsors are only reimbursed for meals served to eligible children.
- Can serve up to three meals/snacks per day.



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 closedenrolled 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 2022-2023
- Summer Food Service Program (SFSP) Income Eligibility Guidelines 2023
- Determining Eligibility for Free and Reduced Price School Meals: Module
 3: <u>Processing Free and Reduced Meal Applications</u>



SFSP State Money and Advances



State Summer Food Service Funds

- Each year, we receive \$51,386.99 from the state to divide among returning sponsors and new 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 fund code and you receive it the same way you are paid 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.



Application Packet Process

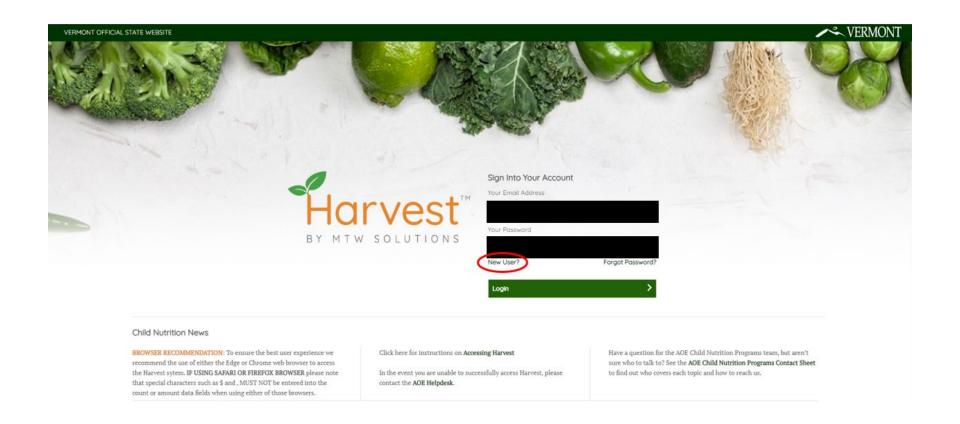


Online System

- SFSP Application Packet can be found in the <u>Harvest Child Nutrition System</u>.
- To request new user access in Harvest, please follow the instructions found in <u>Accessing Harvest</u>.



Creating a New User ID





Application Packet Overview

"2023 SFSP Application Packet Overview" 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
- Ethnic and Racial Data
- Outreach
- Training
- Advances
- General Questions
- Meal Preparation Facilities
- Site Applications
- Budget
- Certification



Budget

 Complete the Site Applications before the Budget.

• It is an administrative planning tool and it sets boundaries to help ensure financial viability.

- Estimated Operating Costs
- Estimated Administrative Costs



Total Meals Projected

- The Site Application(s) **must** be completed prior to 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).



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

- Administrative Labor
 - Program administrator/food service director
 - Site supervisors
 - Clerical support (claim filers)
- 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 non-program 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



Leftover Funds: Revenues in Excess of Expenses

- Can be used to improve SFSP
- Can be put towards the following year's Summer Meals Program
- Can be used for other Child Nutrition Programs

If sponsor ceases program operation, excess funds must be returned to the Vermont Agency of Education 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

- On March 14th, 2023, USDA approved our waiver to allow the State agency to notify the Health Department of program operation on behalf of sponsors, in effect until September 30th, 2023.
- The SA will send Health Department site list 3 times for summer 2023, starting June 1st, 2023.



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
- Ethnic and Racial 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.
- But who gets a second?
- Some only do it on Fridays when leftovers will not last over the weekend.

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



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 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.



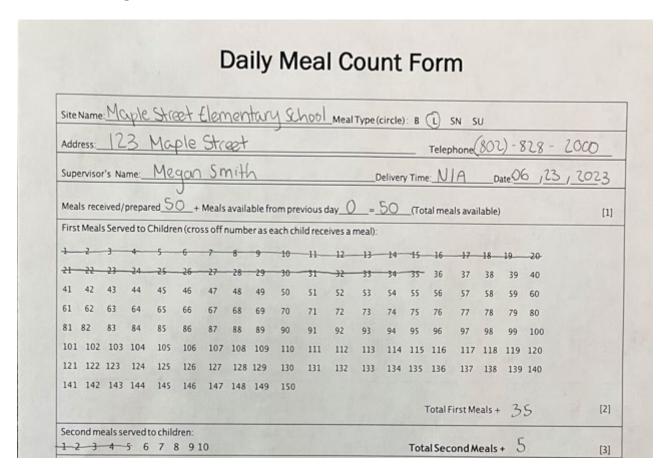
Example of **Incorrectly** Completed Daily Meal Count Sheet 1

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101			124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140		
	122	123	124	123																	

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



Example of **Incorrectly** Completed Daily Meal Count Sheet 2



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



Example of **Correctly** Completed Daily Meal Count Sheet

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The individual numbers are correctly hashed through.

AGENCY OF EDUCATION

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 noncongregate 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 2023

• "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 Foodservice (formerly Reinhart).
- 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 \$100, you have the option to do DoD Fresh.



USDA Foods Options

- If it is less than \$100, you can receive deli turkey breast, shredded cheddar cheese, mozzarella string cheese, fine ground beef, raw beef patties, and pollock fish sticks.
- You can choose to accept or decline your allocation.
- For "brown box" there are storage and delivery fees.
- \$4.15 a case for storage, \$7.90 or \$125 per delivery, whichever is higher. *As of July 1st, 2023:

 Storage fee (for first 120 days): \$1.25 per case
 Extended storage fee (charged every 30 days after initial 120 days): \$1 per case
 Delivery fee: \$2.85 per case
 Minimum delivery fee: \$70
- Schools can combine their summer and school delivery.



USDA Foods Database

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



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 CACFPsize 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 Infant Meal Pattern.



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



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 pre-order system.



OVS for Non-SFA Sponsors

- The <u>Final Rule</u> limits OVS to SFA sponsors, however we requested 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-congregate meal service.
- We are going to track waiver use outside of the Harvest Child Nutrition System.
- Sponsors must watch the Brighton Training Group Course 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</u> <u>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 ½ 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 different.



"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 $\frac{1}{2}$ 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
- Tofu is not creditable in in the SFSP.

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



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 ¾ 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.

• $\frac{1}{4}$ cup of dried fruit = $\frac{1}{4}$ 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



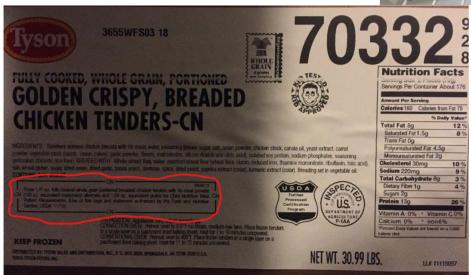
Meal Pattern Documentation

- 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</u>
 <u>Report</u> which is a list of CN-labeled products.



Examples of CN-Labels



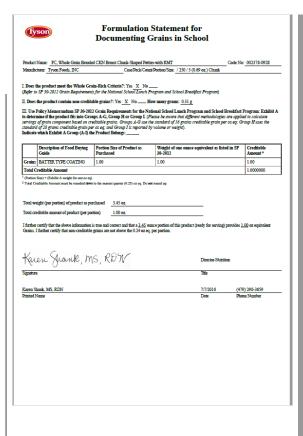


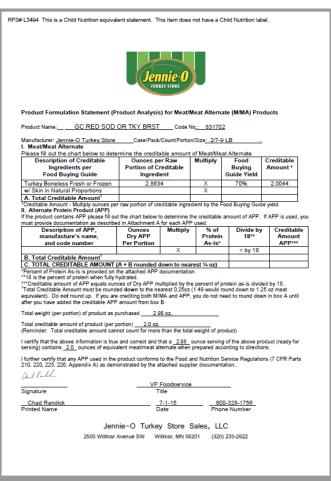


Examples of Product Formulation Statements

	Description of Food Buying Guide		Ounces per Raw Po	rtion of Cr	editable	Multiply	FBG	Creditable
		- TO A T	Ingredient				Yield	Amount *
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Total								0.27039740
if the pro describe	mate Protein Product (APP) oduct contains APP, please fill out the chart belo d in Attachment A for each APP used.			of APP. If				
	Description of APP , Manufacture 's name , and Code Number	Soy Type	Ounces Dry APP Per Portion	Multiply	% of Protein As-Is *	Divid 18 * *	e by	Creditable Amo APP * * *
APP I	PROFAM 981, ADM	Isolate	0.027352	X	86	÷ by l	18	0.1306817
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Tyson Product Formulation Statement







Recipe Resources

- <u>Vermont New School Cuisine Cookbook</u>: 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.
- <u>SP 11-2012, CACFP 05-2012, SFSP 07-2012</u> 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 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



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.

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

Sponsors contracting with a Food Service Management Company must use the VT AOE's Contract Template:

https://education.vermont.gov/documents/edu-nutrition-FSMC-contract-template



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 micropurchase procurement documentation form. It doesn't matter if you receive the entire amount at once or not.
- 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.

• The procurement plan must include Conflicts of Interest and Codes of Conduct.



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.
- 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)

Conor Floyd Grants Program Manager 802-828-0310

conor.floyd@vermont.gov



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.
- Must ensure everyone else involved in the program receives SFSP training and Civil Rights training.



Application Packet Training Tab

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



Training Resources

- Summer Meals Sponsor Training 2023 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
- Staff training must be documented
 - This can be accomplished with 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 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 2023



First Two Weeks Review

- 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.
- Problem sites can be determined by the State agency, such as based on findings from a previous year review, or by a sponsor.
- SFSP First Two Weeks Review Form Summer 2023



Site Review

- This review must be conducted within the first 4 weeks of site operation.
- SFSP Site Review Form Summer 2023



Racial and Ethnic 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, Racial and Ethnic Data cannot be collected by visual observation.



Racial and Ethnic 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 racial and ethnic information.



Administrative Reviews



Sponsor and Site Selection

- Reviews will be conducted for new sponsors, sponsors who experienced significant problems in summer 2022, and sponsors up for their 3-year review.
- Paperwork will be reviewed for all sites.
- 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.



2023 Reviews

- *Coming soon*
- "SFSP Administrative Review Overview Summer 2023"



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)
- Ethnic and Racial Data Form
- Site Review/"4 week" Review Form
- Documentation of staff training
- Employee time attributed to the program
- Relevant procurement documents



Paperwork Reviewed 3

- Civil Rights Complaint Procedure
- Picture of the JFA poster at the Sponsor's office
- Picture of the JFA poster at the selected site
- Copy of most recent Health Inspection Report (if applicable) and picture of it posted
- Pictures of cold and dry storage
- 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 information missing
- 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 non-congregate meal service)



Meal Disallowances

- Missing and/or inadequate components
- Meals consumed off-site (unless approved to operate noncongregate meal service)
- Non-unitized for vended/FSMC meals (without unitizedmeal 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 SFSP Appeals Process.



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.



Serious Deficiency (SD) Procedure



Serious Deficiency Findings

 Discovered during an administrative review, serious deficiency findings are egregious errors that rise above standard findings.



Serious Deficiency (SD) Process

SFSP Serious Deficiency Procedure



Serious Deficiency Sponsor Findings

- Sponsor is not in compliance with applicable bid procedures and contract requirements.
- Submission of false information to AOE.
- Failure to return advance payments in excess of claims for reimbursement.
- A significant portion of the sponsor's sites have program violations including:



Serious Deficiency Site Findings

- noncompliance with approved meal service time restrictions set forth in 7 CFR 225.16(c);
- failure to maintain adequate records;
- failure to adjust meal orders to conform to variations in the number of participating children;
- Inflated meal counts, the meals claimed always equals the number of meals ordered/planned
- simultaneous service of more than one meal to any child;
- claiming of program payments for meals not served to participating children;
- Claiming meals delivered/planned for as meals served to participants;
- Inflating meal counts
- Claiming nonexistent and nonparticipating sites;
- Knowingly claiming dual participation sites;
- service of a significant number of meals that did not include the required quantities of all meal components;
- Excess instances of off-site meal consumption (unless approved for non-congregate meal service); and
- continued use of food service management companies that are in violation of health codes.



Serious Deficiency Findings Continued

- Noncompliance with the requirements in 7 CFR 225.l4(c), demonstrating financial and administrative capability and responsibility.
- Noncompliance with the requirements found in 7 CFR 225.14(d) *Requirements specific to sponsor types*.
- Imminent threat to the health and safety of participating children.



Imminent Threat to Health or Safety

• We will immediately terminate the participation of a site if during a review the health or safety of the participating children is imminently threatened



Serious Deficiency Notice

- If a finding has risen to the level of serious deficiency, this will be indicated in the Review Report provided to the sponsor after the Administrative Review.
- This will include the necessary corrective action and allotted time frame for completion.
- Serious Deficiency Corrective Action is due within 10 calendar days after the report is sent.



Termination

- If required corrective action is not completed correctly and within the allotted timeframe, a termination notice will be issued.
- This could be for the sponsor or site, depending.



Appeals

- Sponsors and sites may appeal termination, except in the case of imminent threat to health and safety of participating children.
- Outside of SD process, sponsors and sites may appeal denial of program participation and other findings, including fiscal action.



Civil Rights



Civil Rights Training

- Everyone involved in program operation and administration must receive Civil Rights training
- This can be accomplished through the Vermont Child Nutrition Programs <u>Civil Rights Training PowerPoint</u> or the <u>Civil Rights Training Recorded Webinar</u>
- Document with names, dates, and signatures



Civil Rights Topics to Cover

- Collection and Use of Data
- Effective Public Notification Systems
- Complaint Procedures
- Compliance Review Techniques
- Resolution of Noncompliance
- Requirements for Reasonable Modifications to Accommodate Disabilities, including Meal Modifications
- Requirements for Language Assistance
- Conflict Resolution
- Customer Service



Federally-Protected Bases

- 1. Race
- 2. Color
- 3. National Origin
- 4. Sex (including gender identity and sexual orientation)
- 5. Age
- 6. Disability



Vermont Agency of Education Protected Bases

- Includes all federal bases and:
- 1. Religion
- 2. Marital/Civil Union Status



Collection and Use of Data

- All income application information is confidential
- Information can be shared with other sponsors; food service directors can share eligibility information with Summer Meals sponsors
- Can share aggregated data, like percentages, with the public



Effective Public Notification System

- Press Release- sent out by SA
- Website
- "And Justice for All" non-discrimination poster
- Civil Rights Complaint Procedure



Press Release by State agency

• The State agency will complete the press release on behalf of all sponsors. Open sites still must advertise their sites.



Program Webpage

- Webpages must contain the non-discrimination statement or the direct hyperlink.
 - include it on site and sponsor-level webpages
 - The one exception would be if the meals program is not referenced in absolutely any way, but that is unlikely and not recommended, as websites are a great way to promote the program and increase participation.
 - USDA Non-Discrimination Statement (English)
 - USDA Non-Discrimination Statement (Spanish)



Short Non-Discrimination Statement

- Any free and reduced-price meal applications must be sent out with the complete non-discrimination statement.
- All other program materials, including flyers, calendar menus, signs, and informational statements accompanying meals are required to have the short non-discrimination statement:
 - "This institution is an equal opportunity provider."
- This statement must be no smaller than the smallest font used throughout the rest of the document.



"And Justice for All" (AJFA) Poster

• Prominently display the official, no local reproduction is allowed, "And Justice for All" non-discrimination poster at the sponsor office, all sites, and field trip locations where meals are consumed (this can be accomplished by taping it to a cooler).



Ordering Non-Discrimination Posters

This is a picture of the required poster.

To get posters, please contact Marc Grimes at marc.grimes@Vermont.gov





Civil Rights Complaint Procedure

- Establish a procedure for documenting and reporting complaints of discrimination
 - SFA or Sponsor Civil Rights Complaint Procedure Template
- Capture details including date, names, contact information
- Refer the person to USDA website to log complaint
- Submit complaint to FNS Regional Office of Civil Rights
- Notify Vermont Agency of Education Child Nutrition Programs
- Follow required timelines



Types of Civil Rights Reviews

- Pre-Award, Post-Award (Administrative Reviews), and Special Civil Rights Reviews.
- New sponsors receive a pre-approval visit, which includes a Civil Rights pre-award questionnaire.
- Civil rights compliance is assessed as part of the Administrative Review.
- Special Civil Rights Reviews may take place at any time should the need arise.



Resolution of Noncompliance

- Civil rights findings must be addressed on-site and/or in Corrective Action.
- State agencies must report significant findings in writing to the reviewed entity and FNS.



Reasonable Modifications to Accommodate Disabilities

- This topic is covered more thoroughly in the Child Nutrition Programs Civil Rights Training
- Physical accessibility
- Modifications to Accommodate Disabilities in CACFP and SFSP
 - Make sure you know what it is in the food and can communicate that information
 - Alternative meal options



Treat All Students Equally

 No separation by protected bases in seating arrangements, serving lines, services and facilities, or eating periods

• Allergy-free tables, such as peanut-free tables, are acceptable, as long as they are not also "punishment" tables.



Language Assistance

- Limited English Proficiency (LEP)
 - Individuals who do not speak English as their primary language and who have a limited ability to read, speak, write, or understand English.
- Consider the needs of your community and the number or proportion of LEP persons in your service area



Translation Resources

- <u>Free and Reduced-Price Meal Applications</u> are available in Nepali, Russian, Spanish, or Ukrainian on our Free and Reduced Meals webpage
- <u>Translated Application</u> in a number of languages
- <u>"And Justice for All" Nondiscrimination Poster</u> language is available in a number of languages
- <u>Nondiscrimination Statement</u> is available in a number of languages
- Other program materials may need translation.
- Foreign language teachers, community organizations, and volunteers may be used.
- Make sure they understand the confidentiality requirements.
- Interpreter hotlines are another option.
- Children should not be used to translate program requirements.



Translation of SFSP Outreach Statements

Translation of SFSP Outreach Statements

Statement 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 http.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 http.www.fns.usda.gov/meals4kids to free meals in your community.
We offer free, nutritious meals for <u>children</u> , 18 and under.
We offer free breakfast and lunch.
There is no pork in this meal.
We offer pork-free options.
We offer vegetarian 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 is this meal.
We offer beef-free options.

- Arabic
- Bosnian
- Burmese
- Chinese (Simplified)
- Dari
- French
- Gujarati
- Karen
- Kinyarwanda
- Kirundi
- Korean
- Malayalam

- Pashto
- Nepali
- Oromo
- Portuguese (Brazilian)
- Somali
- Spanish (US)
- Swahili
- Tamil
- Telugu
- Urdu
- Vietnamese



Conflict Resolution

- It is possible to avoid a potential civil rights complaint with conflict resolution techniques.
 - Remain calm; ask about the situation.
 - Listen and repeat back to be sure you understand.
 - Be empathetic.
 - Ask questions to gather information.
 - Get help from authority figures if there are threats or if violence is possible.



Customer Service

- Good customer service reduces chances of discrimination.
 - Be courteous and thoughtful.
 - Be patient and listen carefully.
 - Treat all children equally.
 - Know and be able to explain any requirements that must be followed.



Anonymity and Confidentiality

- Keep all eligibility documentation confidential
- Prevent overt identification of child's status
 - Coded rosters for meal counting at nonresidential and residential camp sites



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> can be printed if you have lost your copy.



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 Federal Audit Clearinghouse 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 increased programmatic and fiscal monitoring by the Vermont Agency of Education.



For Questions On Completing the Subrecipient Annual Report

Contact:

Jordan Black-Deegan

Statewide Grants Administrator

Vermont Department of Finance & Management

Jordan.Black-Deegan@vermont.gov

(802)-828-3201



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 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)



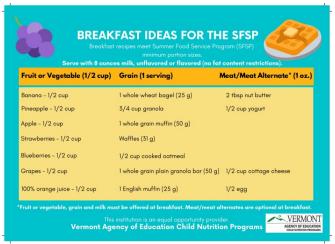
State Level Outreach and Promotion

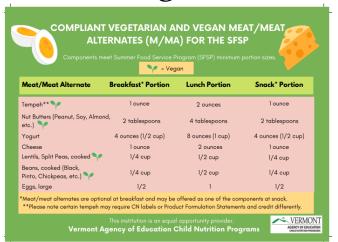
- We advertise all open meal sites on the national website <u>Meals for Kids Site Finder</u>, and the United Way-run resource hotline Vermont 211, and Hunger Free Vermont website
- It is extremely important for you to update your Site Applications to reflect actual program operation.



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- Helen Rortvedt
 - -(802)-828-1589
 - helen@nofavt.org
- 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



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 <u>marc.grimes@vermont.gov</u> to sign up



Questions?

Jamie Curley
Child Nutrition Coordinator
jamie.curley@vermont.gov
(802)-828-2010

Sarah Bangs
Child Nutrition Consultant
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:

1. mail:

3. email:

U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; or 2. fax: (833) 256-1665 or (202) 690-7442; or

program.intake@usda.gov

This institution is an equal opportunity provider.

