Food and Nutrition Service

Park Office Center

3101 Park Center Drive
Alexandria
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SUBJECT: 2017 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option

TO: Regional Directors
Special Nutrition Programs
All Regions

State Agencies
Child Nutrition Programs
All States

This memorandum consolidates the recent policy changes in the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Summer Food Service Program (SFSP) that affect the implementation of the Seamless Summer Option (SSO). This memorandum and its attachment supersede SP 37-2015, *2015 Edition of Questions and Answers for the National School Lunch Program's Seamless Summer Option*, May 22, 2015.

The SSO offers school food authorities (SFAs) operating the NSLP or SBP a streamlined option for providing summer meals by continuing to follow several of the same operational requirements, such as the NSLP/SBP meal patterns and procedures for filing claims and determining student eligibility. For other aspects of the summer meal operation, SFAs implementing the SSO must follow the SFSP requirements, such as site determination. SSO operators may generally use the toolkits and resources developed for the Summer Meal Programs, with the exception of those designated for SFSP use only. Guidance and clarification on all summer meal options available to schools is provided through SP 07-2013, SFSP 04-2013, *Summer Feeding Options for School Food Authorities Revised*, November 23, 2012, available at http://www.fns.usda.gov/sites/default/files/SP07_SFSP04-2013.pdf.

Increasing access to USDA's Summer Meal Programs, including the SSO and the SFSP, is an important priority for the Food and Nutrition Service (FNS). FNS has developed resources for use by State agencies administering the Programs and for organizations participating in these Programs. Summer Meal Programs rely on innovative and collaborative efforts to provide summer meals to children in need. The "Summer Meals Toolkit" is designed for individuals and organizations interested in serving as summer meal champions in their communities at any level of program administration. It is a valuable resource for partner organizations on how they can best support and participate in the Summer Meal Programs. The toolkit includes information on meal service at open sites, partner collaborations, vendor relations, nutrition education resources and other best practices. This online resource is available at http://www.fns.usda.gov/sfsp/summer-meals-toolkit.

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State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at http://www.fns.usda.gov/cnd/Contacts/StateDirectory.htm. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

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Attachment

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National School Lunch Program's Seamless Summer Option
Questions and Answers FY 2017 Edition

All new or significantly revised Q and A's are noted with [New/Revised] at the beginning of the question.

General

1. *[Revised]* What is the Seamless Summer Option?

The Seamless Summer Option (SSO) allows school food authorities (SFAs) to provide free summer meals in low income areas during the traditional summer vacation periods and, for year-round schools, during school vacation periods longer than 10 school days. At year-round schools that have breaks for shorter periods of time, the State agency may waive the 10-day requirement to allow for SSO participation. The SSO is designed to encourage more SFAs to provide meals during summer and other school vacation periods. This option combines features of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and Summer Food Service Program (SFSP).

2. What organizations may participate in the SSO?

Only SFAs administering the NSLP or SBP may participate in the SSO. However, with State agency approval, SFAs may sponsor non-school feeding sites under SSO.

3. Are States required to allow SFAs to operate under the SSO?

Yes, the SSO is an option for SFAs. States cannot "opt out" of SSO.

4. *[Revised]* What eligibility requirements must a site meet in order to be eligible to participate as a meal service location sponsored by an SFA under the SSO?

Site eligibility requirements are the same as for SFSP. The following types of sites may participate and may be located in schools or at non-school facilities: buildings, parks or other outdoor locations, and mobile feeding sites.

Open

- On a first-come, first-served basis, serves all children age 18 and under at a site that is located within an area where at least 50 percent of the children are certified eligible for free or reduced price school meals based on school or census data.
- Meals are reimbursed at the appropriate NSLP or SBP free rates for all attending children.
- If a Community Eligibility Provision (CEP) school offers summer school to students, all of whom are enrolled at the school, the school may operate CEP in the summer school. The school may:
  - Apply the CEP claiming percentages for the NSLP to summer school; or

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    - Establish an identified student percentage (ISP) and CEP claiming percentage for summer school operations and use "summer school" claiming percentages in subsequent years.
- If a CEP school offers summer school to students who, during the regular school year, are enrolled in a different school (CEP or non-Provision), the school may:
    - Offer standard program operations to summer school students (i.e., standard application and meal counting and claiming procedures); or
    - Establish an ISP and CEP claiming percentage for summer school operations and use "summer school" claiming percentages in subsequent years for the summer school session's meal counting and claiming process.

  See http://www.fns.usda.gov/school-meals/community-eligibility-provision and Q22 for more information about CEP.

Restricted open

- On a first-come, first-served basis, serves children age 18 and under at a site that is located within the geographical boundaries of the attendance area of a school where at least 50 percent of the children are certified eligible for free or reduced price school meals or based on other data as discussed in Q17.
- Attendance is limited for reasons of security, safety, or control.
- Meals are reimbursed at the appropriate NSLP or SBP free rates for all attending children.

Area eligibility is based on the percentage of enrolled children approved for free or reduced price meals as of the last day of operation of the most recent school year or other month designated by the State agency or other data as discussed in Q16. The most recent guidance on the use of school and census data for area eligibility determinations in SSO is SP 08-2017, CACFP 04-2017, SFSP 03-2017, *Area Eligibility in Child Nutrition Programs*, December 1, 2016, available at: http://www.fns.usda.gov/area-eligibility-child-nutrition-programs. For information on area eligibility and Community Eligibility, please refer to Q22.

Closed enrolled

- Serves only an identified group of children through age 18 who are participating in a specific program or activity.
- Meals are reimbursed for all children in attendance at the appropriate NSLP or SBP free rates when:
    - At least 50 percent of the children enrolled at the site are approved for free or reduced price school meals; or
    - Documentation indicates that the site is located within the geographical boundaries of a school attendance area with at least 50 percent of its children approved for free or reduced price school meals or other data as discussed in Q17.

Please note: a closed enrolled site that does not meet one of the above criteria is not eligible to participate unless it is qualified to participate as a day camp. Summer school is not a closed enrolled site under the SSO.

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- Enrolled children's eligibility status may be determined by:
  - Information obtained from their schools; or
  - Applications submitted and approved by the sponsoring school or local educational agency (LEA); or
  - Direct certification conducted by the sponsoring school or LEA.

Camps

- May be residential or non-residential (day camp).
- Must offer regularly scheduled food service as part of an organized program for enrolled children.
- Eligibility must be established for each enrolled child.
- Each enrolled children's eligibility status may be determined by:
  - Information obtained from their schools.
  - Applications submitted and approved by the sponsoring school or LEA.
  - Direct certification conducted by the sponsoring school or LEA.
- Area eligibility cannot be used to establish camp site eligibility under SSO.
- Meals are reimbursed at the appropriate NSLP or SBP free rates for eligible children in attendance.
- Meals served to ineligible children are not reimbursed; camps may charge ineligible children for meals.

Migrant

- Primarily serves children of migrant families through age 18, as certified by a migrant coordinator.
- Meals are reimbursed for all children in attendance at the appropriate NSLP or SBP free rates.
- Sites determined eligible based on information from migrant organizations are subject to annual redetermination. For more information on migrant site eligibility, refer to SP 08-2017, CACFP 04-2017, SFSP 03-2017, *Area Eligibility in Child Nutrition Programs*, December 1, 2016, available at: http://www.fns.usda.gov/area-eligibility-child-nutrition-programs.

5. *[New]* When determining area eligibility of a school site, can the percentage of children eligible for free or reduced price school meals at another school in the same attendance area be used?

Yes. For example, if a high school does not have 50 percent or more of enrolled children eligible for free or reduced price meals, it can look at other schools in the same area to qualify. If a middle school in the same attendance area has 50 percent or more of enrolled children meeting the free or reduced price meals eligibility criteria, the high school could use the middle school to meet the area eligibility requirements for SSO. In other words, school sites establish area eligibility the same as any other site.

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6. ***[Revised]*** **What is categorical eligibility and how does it apply to children participating in the SSO?**

Categorical eligibility is determined by the receipt of benefits by any household member from certain assistance Programs. The receipt of benefits from these Programs conveys categorical eligibility for free school meals to all children in the household. The determination is made through an application with appropriate case numbers or through "direct certification for assistance programs." The assistance Programs include the Supplemental Nutrition Assistance Program (SNAP), the Food Distribution Program on Indian Reservations (FDPIR), and the Temporary Assistance for Needy Families (TANF). Please note, TANF is a Federal designation; each State has its own name and acronym for the Program.

Children may also be categorically eligible if they are documented as: homeless, runaway, or migrant; a foster child, or enrolled in a federally-funded Head Start or comparable State-funded Head Start or pre-kindergarten programs. More information can be found in the *Eligibility Manual for School Meals: Determining and Verifying Eligibility* at http://www.fns.usda.gov/2016-edition-eligibility-manual-school-meals.

State Agency Approval of SSO Participation

7. ***[Revised]*** **What are the criteria for SFA participation in the SSO?**

The SFA must be able to demonstrate administrative capability and financial viability to properly operate the meal service during school vacation periods. The State agency should not approve applications from SFA that have significant problems operating either the NSLP or SBP. Previous participation in the SFSP is not a requirement for participating in the SSO.

8. ***[New]*** **What are the requirements for schools serving community children?**

If an SFA plans to offer summer meals to the community, the SFA may participate in either the SFSP or SSO as a sponsor. Both programs allow SFAs to feed children in eligible areas during the traditional summer vacation periods and, for year-round schools, school vacation periods longer than 10 school days. Only SFAs administering the NSLP or SBP may participate in the SSO. Under both programs, SFAs may sponsor school and non-school sites.

9. **What are the requirements for SSO site (including schools) applications?**

At a minimum, SFAs must submit the following information for each site to the State agency for application approval:

- Name, address, and phone number of each site.
- An indication of whether the site would operate for schools that have a year-round school calendar and provide services for the duration of vacation periods.
- Type of site (see Q4).

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- Name of the organization(s) that will operate the site for the SFA (if applicable).
- Types of meals, including day(s) of week and time(s) of day, served.
- Additional information listed below for the particular type of site.

For open sites and restricted open sites:

- Documentation indicating that the site is a school that has at least 50 percent of children enrolled in the school approved for free or reduced price meals; or, if the site is located within the geographical boundaries of the attendance area of a school where at least 50 percent of the children are certified eligible for free or reduced price school meals or based on other data as discussed in Q17.
- For restricted open sites, an explanation of why the SFA is restricting attendance on the basis of security, safety, or control.

For closed enrolled sites:

- Documentation indicating that the site is a school, that at least 50 percent of children enrolled in the school are approved for free or reduced price meals; or, if the site is located within the geographical boundaries of the attendance area of a school where at least 50 percent of the children are certified eligible for free or reduced price school meals or based on other data as discussed in Q17. If individual children's eligibility is the basis for eligibility, the source of the documentation (from their regular schools, applications submitted to the site and approved by the sponsoring school or LEA or a combination of both sources).
- An explanation of why the SFA is sponsoring a closed enrolled site.

For camps:

- Indicate type of camp
  - Residential or
  - Non-residential (day camp)
- For non-residential camps, a brief description of the organized program for participating children.
- An explanation of why the SFA is sponsoring camps instead of establishing other, more conventional SSO sites.
- The source of the documentation for individual children's eligibility (from their regular schools, applications submitted to site and approved by the sponsoring school or LEA or a combination of both sources).
- Certification that the camp will only claim reimbursement for children who are eligible for free or reduced price meals.

For migrant sites:

- Certification from the migrant organization sponsoring the site that the site serves children of migrant worker families and that it primarily serves migrant children if it also serves non-migrant children.

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10. The regulations define a school year as July 1 through June 30, and the new income eligibility guidelines (IEGs) become effective on July 1. Since SSO sites may be operational across two school years (SY), can eligibility information from the prior school year continue to be used and which IEG should be used?

Yes. The income eligibility information from the SY that ended on June 30 may be used to determine area eligibility for the entire summer. If an application is submitted to determine an individual child's eligibility, the SFA would use the IEGs in effect at the time an application was processed.

11. Are State agencies required to provide training to SFAs approved to operate SSO?

There is no mandatory training, but FNS strongly encourages State agencies to provide training and technical assistance to SFAs based on their assessment of the need for training. It is especially important for State agencies to properly train SFAs that sponsor non-school sites on the appropriate procedures for operating SSO at a non-school location.

Site Eligibility

12. Can an SFA sponsor a site that is located outside of its district?

Yes, with State agency approval.

13. Can an SFA sponsor non-school sites operated by other non-profit organizations?

Yes, with State agency approval.

14. Can an SFA sponsor a mobile feeding site?

Yes, with State agency approval SFAs may use Program funds to operate a mobile feeding site. For more information about the mobile feeding model, refer to SP 02-2014, SFSP 02-2014, *Mobile Feeding Options in Summer Feeding Programs*, November 8, 2013 available at http://www.fns.usda.gov/sites/default/files/SP02_SFSP02-2014os.pdf.

15. Can a State agency approve SFA operation of SSO sites (school or non-school) at for-profit locations?

Yes. State agencies may approve SFAs operating SSO sites at for-profit locations if the site meets the criteria outlined in policy memo SFSP-13-2011, *For-Profit Locations as Meal Sites in the Summer Food Service Program*, April 8, 2011 available at http://www.fns.usda.gov/sites/default/files/SFSP-13-2011.pdf.

16. *[New]* Can a location serve as both an SSO site and an SFSP site?

A sponsor cannot serve both SSO and SFSP at one site, on the same day. It is not the intent of the programs to be used in conjunction, but rather a sponsor should choose the

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program that is most compatible with the needs of the site. Sponsors should refer to the *Seamless Summer and Other Options for Schools* Web site to help select the meal service that is most appropriate for each site at http://www.fns.usda.gov/sfsp/seamless-summer-and-other-options-schools.

There have been rare situations where a single meal site location is serviced by more than one sponsor. For example, a school site could be serving SSO breakfast during the week and a separate SFSP sponsor could offer lunch or a snack at the same site, serving the same children, on Saturday or Sunday. As long as the two sponsors combined do not provide more than the allowed number of meals each day to the same children, this scenario would be allowed.

17. Can sites qualify for participation in the SSO by using data other than a school's percentage of free or reduced price enrollment?

Yes. SFAs may document the area eligibility of their proposed open or restricted open sites on the basis of census data. SSO sites that choose to establish eligibility using census data are required to use the most recent data available. Fifty percent or more of the children in a Census Block Group (CBG) or census track must be eligible for free or reduced price school meals to establish eligibility. For guidance on the census data for area eligibility determinations in SSO, refer to SP 08-2017, CACFP 04-2017, SFSP 03-2017, *Area Eligibility in Child Nutrition Programs*, December 1, 2016, available at: http://www.fns.usda.gov/area-eligibility-child-nutrition-programs.

The Area Eligibility Mapper (http://www.fns.usda.gov/areaeligibility) is a tool that can help State agencies and sponsors determine area eligibility in both SSO and SFSP using census data. The Area Eligibility Mapper utilizes the most recent census data available. Instructions for determining area eligibility and using the data are available at: http://www.fns.usda.gov/sites/default/files/Census%20Instructions%202014_0.pdf.

See Q22 for more information about the use of ISP percentages.

18. Are there flexibilities available in the use of census data?

Yes. The SFA may use census block group (CBG) data or census tracts. With State agency approval, up to three adjacent CBGs may be averaged, using a weighted average, to determine eligibility. When averaged, the site is considered eligible if 50 percent or more of the children are approved for free or reduced price meals. Each of the combined CBGs must have at least 40 percent or more children approved for free or reduced price meals for an SSO site to qualify using combined CBG data. Unlike CBGs, census tracts may not be combined.

A more detailed description of the definition of CBG data is available in SP 08-2017, CACFP 04-2017, SFSP 03-2017, *Area Eligibility in Child Nutrition Programs*, December 1, 2016, available at: http://www.fns.usda.gov/area-eligibility-child-nutrition-programs.

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19. Once approved to operate the SSO, must site eligibility be re-determined each year?

Any SSO sites that participate on the basis of area eligibility using school or census data (as described in Q17 and Q18) are certified under that data for 5 years. State agencies are prohibited from requiring more frequent area eligibility redeterminations unless the State agency is aware of significant economic changes in the area.

Sites that participate on the basis of individual children's eligibility, such as closed enrolled sites and camps, must re-determine their eligibility each year.

20. *[New]* If a sponsor leaves the program for a year, and returns, may it use its prior 5-year area eligibility determination or must it be re-determined?

The 5-year area eligibility determination must be reassessed upon a sponsor's return to the program. However, if the sponsor transitioned from another Child Nutrition Program (for example, they transitioned from SSO to SFSP and then returned to SSO) the sponsor may maintain its eligibility. See SP 08-2017, CACFP 04-2017, SFSP 03-2017, *Area Eligibility in Child Nutrition Programs*, December 1, 2016, available at http://www.fns.usda.gov/area-eligibility-child-nutrition-programs.

21. If the site is either a school using Provision 2 or 3 or is within the attendance area of a school using Provision 2 or 3, what eligibility data may be used?

Data from the school's base year may be used to determine area eligibility. As discussed in Q17 and Q18, the SFA may also use census block group data as approved by the State agency.

22. *[Revised]* What site eligibility data is required if the site is a community eligibility school or is within the attendance area of a school using community eligibility?

The product of the ISP multiplied by 1.6 should be used for community eligibility purposes. If the result is equal to or greater than 50 percent, meal sites located in the attendance area of the school are area eligible. Schools in LEAs electing to use the CEP for the entire LEA or as part of a group of schools electing CEP with a shared ISP must still use the individual school CEP percentage.

To determine area eligibility for a CEP school, the individual school's ISP is multiplied by a factor of 1.6. If the result is at least 50, meal sites within the school's attendance area are area eligible. Individual school data must be used to determine area eligibility, even if the school is participating in CEP as part of a group or district claiming with a shared ISP. If the school's ISP is at least 31.25, meal sites located in the attendance area of the school are area eligible (i.e., 31.25 x 1.6 = 50). ISP data may only be used to determine area eligibility for schools electing CEP. If a school electing CEP collects alternate household income information to be used for other purposes, school data based on these applications may not be used to determine area eligibility. School districts electing CEP must continue to provide to the NSLP State agency a list of schools under its jurisdiction in which

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50 percent or more of enrolled children have been determined eligible for free or reduced price meals, using the ISP multiplied by 1.6 for CEP schools. For more information on CEP, see http://www.fns.usda.gov/school-meals/community-eligibility-provision.

23. Can an SFA limit its sponsorship just to school sites?

Yes. An SFA should match its sponsorship of sites with its financial and administrative capabilities. Where feasible, an SFA could expand its SSO participation to serve more children in the community by sponsoring non-school sites.

24. Under what circumstances may a school operate an academic summer school and also serve as an SSO site?

Schools located in eligible areas and offering meals to summer school students are encouraged to expand to serve as an SSO open site by opening the meal program to other children in the community. Schools operating SSO use the same meal pattern required under NSLP and SBP and can maintain the same staff and vendors.

25. Can a school or site participating under the SSO as an open site serve meals at staggered times for community children and school children attending summer school?

Yes. Schools or sites participating under the SSO must ensure community children have the same access to meals as children enrolled in summer school. If meal service times are staggered, the same meal service must be provided to both groups, meaning the same food is served for the same length of time.

26. Can a year-round school with off-track breaks participate in the SSO?

Yes, as long as the school is on a year-round/continuous schedule and the off-track breaks are officially part of the school schedule. Typically, the off-track breaks are at least 10 school days; however, SSO service during shorter periods may be approved by the State agency.

Periods of Operation

27. What are the months of operation for schools operating under a traditional school calendar?

The months of SSO operation for these schools are:

- May through September when school is not in session.
- October through April for non-school sites only that are responding to an unanticipated school closure (see Q29).

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28. When may the SSO be operated in year-round schools?

The SFA may operate the SSO during any scheduled break of 10 or more school days. SSO service during shorter periods can be approved by the State agency. In addition, the SSO may operate any time during the year for non-school sites that are responding to an unanticipated school closure.

29. What is an unanticipated school closure?

An unanticipated school closure is defined as a natural disaster, unscheduled major building repair, court order relating to school safety or other issues, labor-management dispute, or other similar cause as approved by the State agency. As mandated by the Richard B. Russell National School Lunch Act, meals provided during an unanticipated school closure must be served at non-school sites. Under these circumstances, schools cannot offer meals at school site affected by an unanticipated school closure under the SSO except as noted in Q30.

30. *[Revised]* Can schools operating on a traditional school calendar operate the SSO during winter or spring breaks or at other times when school is closed?

Schools following a traditional school calendar may not offer meals under the SSO during winter or spring breaks, unless the break is longer than 10 days. A school operating on a traditional school calendar may operate the SSO only during the approved summer months or during an unanticipated school closure (see Q29). Schools may wish to consider participating in the At-Risk Afterschool Meals component of the CACFP to provide additional meals to students during winter or spring breaks.

For more information, refer to SP 06-2014, CACFP 03-2014, SFSP 06-2014, *Available Flexibilities for CACFP At-risk Sponsors and Centers Transitioning to Summer Food Service Program*, November 12, 2013, available at http://www.fns.usda.gov/sites/default/files/SP%2006_CACFP%2003_SFSP%2006-2014os.pdf.

31. Can a school or site operate SSO sites after a disaster?

Yes. SFAs with current permanent agreements with their State agency may be approved to open emergency feeding sites when schools are closed due to a disaster. SFAs should work with their State agencies to become pre-approved to operate emergency feeding sites during unanticipated school closures during their initial application process. For more information, refer to SP 46-2014, CACFP 12-2014, SFSP 18-2014 *Disaster Response*, May 19, 2014, available at http://www.fns.usda.gov/disaster-response-0.

The FNS RO may waive the Program requirements that SFAs document that each site is serving an area that is 50 percent or more free or reduced priced eligible for existing eligible sites located in the area damaged by a natural disaster that must relocate to areas that are not eligible based on school or census data.

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Additionally, State agencies may allow school sites to operate the SSO during an unanticipated school closure. Although schools may be closed, some school buildings may be unaffected by the disaster and may be approved as the most appropriate location for emergency feeding.

32. *[New]* If a school SSO site is operating a summer enrichment program for part of the summer break, can they also offer SSO meals without the enrichment program to close the gaps between the school year and the summer program?

Yes. FNS' goal is to ensure that children who rely on the NSLP and SBP continue to have access to nutritious meals when the school year ends. Although encouraged, there is no requirement to offer an enrichment or educational program when operating SSO.

Meal Service

33. *[New]* Where can I find information about how to make summer meals more nutritious?

Summer meal sites play a valuable role in helping children learn, grow, and stay healthy. By offering nutritious foods at summer sites, children learn how to build a healthy plate and establish healthy eating habits that may continue into adulthood. SSO sponsors must plan meals using the meal patterns established for NSLP and SBP, which are based on the recommendations of the Dietary Guidelines for Americans (Dietary Guidelines). These meal patterns help operators to plan summer meals with nutrient-dense foods like whole grains, whole fruits and vegetables, and fat-free/low-fat milk. FNS provides an abundance of menu planning resources for summer meals.

A new meal quality handout available under USDA's Team Nutrition initiative, entitled "*Offering Healthy Summer Meals That Kids Enjoy*," is available at http://www.fns.usda.gov/tn/offering-healthy-summer-meals. This resource provides practical ideas for small changes that sites can implement to improve the nutritional quality of meals they serve, and ways to make foods more appealing to children and teens. Schools participating in the SSO may request free printed copies of this resource in Spanish and in English. State agencies may also request these materials. Questions about bulk ordering may be sent to TeamNutrition@fns.usda.gov.

34. *[New]* How can schools encourage kids to consume healthy food offerings?

Schools participating in the SSO may request free printed nutrition education resources under USDA's Team Nutrition initiative at: http://www.fns.usda.gov/tn/summer-food-summer-moves.

Summer Food, Summer Moves is a fun, hands-on resource kit designed to get kids and families excited about healthy eating and physical activity during the summer months. The kit is designed for use by summer meal site operators and focuses on using music, games, art, and movement to motivate kids and families to choose more fruits and

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vegetables, choose water instead of sugary drinks, get enough physical activity every day, and to limit screen time. The kit includes an *Operator Activity Guide*, educational posters, promotional fliers, family handouts, and an activity placemat. All materials are available in English and Spanish. State agencies may also request these materials. Questions about bulk ordering may be sent to TeamNutrition@fns.usda.gov.

35. *[New]* Should SFAs incorporate local foods in the meals at an SSO site?

Yes! FNS encourages SFAs to use local foods as a means to provide high quality summer meals. Serving local foods can add variety and appeal to meals, and also serves as a gateway to complementary activities that keep children interested and engaged in summer programming. Summer is often a time of agricultural abundance. Incorporating local foods into meals can reduce meal costs and support regional economic development. By offering local products in summer, sponsors can introduce children to the growing seasons and may introduce new products, or familiar items in their freshest state. Summer is also a great time to involve children in gardening and other hands-on learning activities that reinforce the healthy habits they learn throughout the school year. USDA's Team Nutrition initiative offers many free nutrition education and gardening resources: http://www.fns.usda.gov/tn/team-nutrition-garden-resources.

For more information on how to get started, see the USDA guide *Procuring Local Foods for Child Nutrition Programs* at http://www.fns.usda.gov/farmtoschool/procuring-local-foods, and visit the Office of Community Food Systems' Farm to Summer website at http://www.fns.usda.gov/farmtoschool/farm-summer. Note that the SFAs must procure all goods and services following the procurement regulations [7 CFR 225.17 and 2 CFR 200.317-326].

36. What is the age requirement for children participating in the SSO?

All persons in the community who are 18 years of age and under and those persons over age 18 who meet the State agency's definition of mentally or physically disabled may receive meals under the SSO.

37. If a closed enrolled site employs staff who are 18 or younger, can the meals served to those staff members be claimed under the SSO?

Meals served to site employees 18 or under may not be claimed because it is a closed enrolled site. In closed enrolled sites, only those meals served to the enrolled children may be claimed. Even though staff members may meet the age requirement, they are not enrolled at that site and the meals they receive are not eligible for reimbursement.

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38. If an open or restricted open site employs staff who are 18 or younger, can the meals served to those staff members be claimed under the SSO?

Yes. Meals served to site employees 18 or under may be claimed under SSO because it is an open or restricted open site. In open and restricted open sites, meals served to all attending children may be claimed under SSO.

39. Can an SSO site charge for meals served to participating children?

Meals at all approved SSO sites, except for camps, must be served free of charge to all children. SFAs that sponsor camps may charge for the meals served to children who are not eligible to receive free or reduced price meals.

40. *[Revised]* Can an SSO site serve meals to adults? How much should an SSO site charge for meals served to adults?

SSO sites are allowed to serve meals to adults under certain circumstances. How the meal is reported and claimed depends on whether the adult is a Program Adult or a Non-Program Adult.

Program Adults work directly with the meal service at the summer site as either a volunteer or an employee. Meals may be served free to Program Adults. Meals served to Program Adults cannot be claimed for reimbursement but they may count as an operating cost.

Non-Program Adults do not work in any direct way with the meal service at the site. For example, parents or guardians are Non-Program Adults. Sponsor may choose to serve meals to Non-Program Adults at no charge or charge the full cost of the meal.

If a sponsor chooses to serve meals to Non-Program Adults, he/she cannot use SSO funds to cover Non-Program Adult meals. When serving meals to Non-Program Adults, the sponsor must either charge the adult the full cost of the meal or use other non-Program funds to cover the full cost of the meal (such as the general fund account).

The cost of meals served to Non-Program Adults may be counted as part of the sponsor's operating costs if the adult pays the full cost of the meal. When using non-Program funds to cover the cost of these meals, the sponsor may include those funds as Program income and pay for the meal cost from its nonprofit food service account.

The calculation of the meal costs should be based on the full cost of preparing the meal, including the food, supplies, labor and other costs paid for by the sponsor. Sponsors should also include the value of the U.S. Department of Agriculture (USDA) Foods used to prepare the meal or this value may be based on the current year entitlement per meal value of USDA Foods. For additional information, please refer to FNS Instruction 782-5, Rev. 1, *Pricing of Adult Meals in the National School Lunch and School Breakfast Programs* and SP 10-2017, SFSP 06-2017, *Meal Service Requirements in the Summer*

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Meal Programs, with Questions and Answers - Revised, December 05, 2016, available at http://www.fns.usda.gov/meal-service-requirements-summer-meal-programs-questions-and-answers-%E2%80%93-revised.

41. How many meals are reimbursable under the SSO per day?

The number and type of meals that may be reimbursed depends on the category of site. At open, restricted open, and closed enrolled sites: a maximum of two meals, such as lunch and breakfast, or lunch and one snack, breakfast and one snack, or one snack and supper may be claimed per child per day. Open, restricted open and closed enrolled sites cannot claim lunch and supper meals served to the same children on the same day.

At camps (residential and non-residential): only the meals served to children eligible for free or reduced meals (based on approved applications or direct certification) may be reimbursed; a maximum of three meals, such as breakfast, lunch, and supper, may be claimed per child per day.

At migrant sites: a maximum of three meals, such as breakfast, lunch, and supper, may be claimed per child per day.

Only camps and migrant sites may claim both lunch and supper served to the same children on the same day.

42. *[Revised]* What meal pattern requirements are SSO sites required to follow?

SFAs offering the SSO must follow the NSLP and SBP meal pattern requirements established in 7 CFR 210.10 and 7 CFR 220.8, respectively. In addition, SSO sites must provide meal accommodations consistent with the policy established in SP 59-2016, policy memorandum on *Modifications to Accommodate Disabilities in the School Meal Programs*. See http://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs.

43. *[New]* Do SSO sites have to follow the Smart Snacks in Schools standards?

No. The Smart Snacks in Schools (SSIS) standards do not apply to SSO. However, if the site is also operating summer school and serving NSLP meals on campus, SSIS standards apply. These standards apply to all food sold to students on campus, throughout the school day. Please visit: http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks for details.

44. *[Revised]* Do SFAs operating SSO have to follow the age/grade group requirements?

SFAs offering SSO must follow the established NSLP or SBP meal pattern for the age/grade groups at the site. However, SFAs operating open and restricted open sites that have difficulty implementing the age grade/group requirement may work with their State agencies to make accommodations. These accommodations may include using a single

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age/grade group meeting the minimum meal pattern requirements for the most common age/grade group attending the site. This holds true for both school and non-school sites. All accommodations must possess a reasonable justification for the need to deviate from age/grade group requirement and be added as an addendum to the agreement between the SFA and State agency. Additionally, these accommodations only apply to open and restricted open sites where meals are served to all children in the community on a first come/first served basis. All other sites that serve an identified group of children, including closed enrolled sites and camps, must follow meal pattern for each age/grade established in 7 CFR 210.10 and 7 CFR 220.8.

While SSO closed enrolled sites and camp sites may not offer meals under a single age/grade group, these sites do have some menu planning flexibility. For example:

- At breakfast, meal requirements for all 3 age/grade groups could be combined into a single K-12 menu. This weekly menu would have to offer the milk and fruit minimum requirements (same for all grade groups) as well as at least 9 ounce equivalent of grains per 5-day week. The average weekly meal would need to stay within a range of 450-500 calories, and below the sodium limit for the K-5 group.

- At lunch, meal requirements for grades K-8 can be combined into a single menu. This menu would have to offer 8-9 ounce equivalent of grains and 9-10 ounce equivalent meats/meat alternates per week. The average weekly meal would need to stay within a range of 600-650 calories and stay below the sodium limit for the K-5 group. This menu could be adjusted for grades 9-12 by adding slightly more grains, vegetables and fruit, and meat/meat alternates for the older children.

More suggestions on how to create menus that meet the requirements of multiple age/grade groups can be found in SP 10-2012 (v.9), *Questions & Answers on the Final Rule, Nutrition Standards in the National School Lunch and School Breakfast Programs*, August 3, 2015, available at http://www.fns.usda.gov/sites/default/files/cn/SP10-2012v9os2.pdf.

45. Do the flexibilities regarding weekly maximum limits for grains and meat/meat alternate apply to SSO sites?

Yes. Menus that exceed the maximums will be considered compliant as long as the daily and weekly minimums are met. Menus are subject to weekly calorie, saturated fat, and sodium limits [7 CFR 210.18(g)(2)(vi)].

46. Can meals be served on weekends under the SSO?

Yes, with State agency approval. An SFA that plans to serve weekend meals in the SSO must include this information in its application.

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47. *[Revised]* How should SFAs operating SSO sites more than five days per week implement the meal pattern weekly quantities requirements?

SSO sites operating more than five days a week should increase the weekly grains quantity by approximately 20 percent (1/5) to account for each additional operating day.

For more information, see SP 10-2012 (v.9), *Questions & Answers on the Final Rule, Nutrition Standards in the National School Lunch and School Breakfast Programs,* August 3, 2015, available at http://www.fns.usda.gov/sites/default/files/cn/SP10-2012v9os2.pdf as well as the short and long week calculations found online at http://www.fns.usda.gov/sites/default/files/SP10-2012r2a.pdf.

48. *[Revised]* How should SFAs operating SSO sites less than five days per week implement the meal pattern sub group requirements?

SSO sites operating on a limited schedule should follow the calculation of meal pattern requirements during short weeks as required in SP 10-2012 (v.9), *Questions & Answers on the Final Rule, Nutrition Standards in the National School Lunch and School Breakfast Programs,* August 3, 2015, available at http://www.fns.usda.gov/sites/default/files/cn/SP10-2012v9os2.pdf as well as the short and long week calculations found online at http://www.fns.usda.gov/sites/default/files/SP10-2012r2a.pdf.

49. What meal pattern must be used for a supper meal under the SSO?

SFAs must use the NSLP meal pattern for lunches established in 7 CFR 210.10 when serving supper meals.

50. Are there designated meal periods for SSO sites?

Yes. Meal times for breakfast and lunch must follow the designated times in the SBP and NSLP regulations. According to 7 CFR 220.2(b), breakfast must be served to a child in the morning hours. Lunch must be offered between 10:00 am and 2:00 pm, as provided in 7 CFR 210.10(f) (see Q 51 for exception). Snacks must be evenly and adequately spaced between other meal service times to minimize food waste and ensure good nutrition practices. Supper meal times must be established for each site. SFAs must gain approval of their established supper meal time from their State agency.

State agencies may establish supper meal time restrictions. Any State restrictions will be considered additional State requirements and should be handled using the same approval process used for SFSP as required in SFSP 06-2013, *Additional State Agency Requirements in the Summer Food Service Program*, January 24, 2013, available at http://www.fns.usda.gov/sites/default/files/SFSP06-2013_0.pdf.

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51. ***[Revised]*** **Can a SFA operate meal service outside of the formal 10 am-2 pm lunch time?**

Yes. State agencies may approve SSO sites to operate open or restricted open meal service outside the formal lunch time of 10 am-2 pm. However, the State agency has the authority to approve or deny the SFA's proposed SSO meal times.

52. ***[Revised]*** **In year-round school sites, must a school differentiate between meal counts for children receiving meals through NSLP or SBP (on-track) and children receiving meals through SSO (off-track)?**

Yes. Year-round school sites must keep separate meal counts for on-track children and off-track children. This is because 1) off-track children may receive meals free of charge regardless of their eligibility status and the on-track children may be paying reduced or full prices for their meals, and 2) off-track meals may be reimbursed at the free rate and the on-track meals are reimbursed at the free, reduced price or paid rates if the site is considered open.

53. ***[Revised]*** **Are SSO sites required to notify the State agency prior to a field trip?**

There is no Federal requirement in the NSLP or SBP that SFAs obtain permission prior to serving meals on a field trip. However, SFAs operating SSO sites should check with their State agency because some may require prior notification of field trips.

54. ***[Revised]*** **Is Offer versus Serve (OVS) allowed at SSO sites?**

Yes. OVS is allowed but not required at SSO sites. If an SSO site chooses to do OVS for lunch and/or breakfast, it would follow the requirements in the OVS manual. This would apply regardless of the ages of the children served. The differences would be portion sizes but the OVS requirements are the same for all ages.

For more information, see 7 CFR 210.10(e), 7 CFR 220.8(e), and refer to SP 41-2015, *Updated Offer versus Serve Guidance for the National School Lunch Program and School Breakfast Program Beginning SY 2015-16*, July 21, 2015, available at: http://www.fns.usda.gov/updated-offer-vs-serve-guidance-nslp-and-sbp-beginning-sy2015-16.

55. ***[Revised]*** **Are second meals reimbursable at SSO sites?**

All SSO sites must plan for and prepare one meal per child per meal service. However, FNS recognizes that fluctuation in attendance at breakfast makes it difficult to precisely estimate the number of meals needed. As a result, FNS allows SSO sites to offer eligible children a second breakfast and claim it for reimbursement in accordance with the requirements in 7 CFR 220.9(a). SSO sites may not claim second lunches or snacks for reimbursement under the SSO (see 7 CFR 210.10(a)(2)).

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56. Can an SSO site serve meals family style?

Camps and closed enrolled sites in the SFSP and SSO have the option to serve meals using family style meal service. Both camps and closed enrolled sites provide the stable environment required for a successful family style meal service to provide nutritious meals to children and promote healthy eating habits through the personal example provided by supervising adults. Family style meal service is still prohibited at open and open restricted sites in the SFSP and SSO.

57. *[New]* Are share tables in SSO allowed?

Yes. SSO sites may create a "sharing table" or stations where children may return whole items that they choose not to eat. Sites must check that "share tables" are in compliance with State and local health and safety codes first. Unopened, unused, whole food items left on the share table are then available to other children who may want additional helpings. This practice may be facilitated by serving meal components that can be easily "recycled." For example, if an apple is served as part of a meal, a child can return the apple to the share table.

When equipment is available, complete meals and nonperishable components that remain on a share table may be appropriately stored for later service. All recycled food items must be stored in accordance with State and local health and safety codes and must be documented. Please check with your State and local health department or food service codes regarding sharing tables. (See SP 10-2017, SFSP 06-2017, *Meal Service Requirements in the Summer Meal Programs, with Questions and Answers - Revised*, December 05, 2016, available at http://www.fns.usda.gov/meal-service-requirements-summer-meal-programs-questions-and-answers-%E2%80%93-revised and SP 41-2016, CACFP 13-2016, SFSP 15-2016, *The Use of Share Tables in Child Nutrition Programs*, June 22, 2016 http://www.fns.usda.gov/use-share-tables-child-nutrition-programs.)

58. *[Revised]* Can food be taken off-site?

Meals offered in the SSO are intended to be consumed onsite in a designated foodservice area during the established meal service period. However, sponsors may allow a child to take one fruit, vegetable, or grain item offsite for later consumption provided this is in compliance with State and local health and sanitation codes. In addition, schools may also wish to set up sharing tables for appropriate items to minimize food waste. Food items taken offsite must be from the child's own meal or left on a "share table" by another child who did not want it.

For more information, please refer to SP 10-2017, SFSP 06-2017, *Meal Service Requirements in the Summer Meal Programs, with Questions and Answers Answers - Revised*, December 05, 2016, available at http://www.fns.usda.gov/meal-service-requirements-summer-meal-programs-questions-and-answers-%E2%80%93-revised and SP 41-2016, CACFP 13-2016, SFSP 15-2016, *The Use of Share Tables in Child Nutrition*

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Programs, June 22, 2016 http://www.fns.usda.gov/use-share-tables-child-nutrition-programs.

59. *[New]* What do SFAs need to do to meet the requirements of the Buy American provision at SSO sites?

Under the Buy American provision in the National School Lunch Act, USDA requires that SFAs purchase, to the maximum extent practicable, domestic commodities or products. This provision applies to SSO and can be accomplished by including the Buy American provision in solicitations, contracts, and product specifications. For more information, please refer to SP 24-2016, *Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program*, February 3, 2016, available at http://www.fns.usda.gov/compliance-and-enforcement-buy-american-provision-nslp.

Local Level Monitoring

60. When must SSO sites be reviewed by the SFA?

Each year, SFAs are required to review each SSO site at least once during its operation. The SFA must review the site's compliance with meal counting, claiming, menu planning, and food safety requirements.

61. Does SSO have different food safety guidelines than NSLP?

No, the guidelines are the same. Schools are required to obtain a minimum of two food safety inspections during the year; sites participating in more than one Child Nutrition Program are not required to obtain more than these two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals. With SSO, there is no requirement for the SFA to obtain an additional food safety inspection.

62. *[Revised]* To ensure that the meal pattern requirements are met, should the school/site have records of food purchases?

Food purchasing records (e.g., solicitation documents, contracts, invoices, receipts) are records to support the history of the procurement (2 CFR 200.318(i) not evidence that meal pattern requirements are met. As set forth in 7 CFR 210.10(a)(3) and 220.8(a)(3), schools must keep production records and menu records for the meals they produce, including those offered under the SSO. The production records must allow the State agency to evaluate how the meals contribute to the required food components or food items.

However, records for food purchases (invoices, receipts) are necessary to document the expenditure of funds from the nonprofit foodservice account for compliance with determining the proportion of program and non-program food expenditures in relation to revenues. For SFAs with cost reimbursable SFA-Food Service Management Company

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(FSMC) contracts, food invoices are required to determine the value of discounts, rebates, and credits received by the FSMC, and credited to the SFA. This requirement helps to ensure the return of the full value of credits to the nonprofit foodservice account.

63. Do SFAs have to conduct edit checks, as required under 7 CFR 210.8 of the NSLP regulations, for sites operating under the SSO?

Edit checks are not required for SSO sites during the period of time that the SFA is operating the sites under the SSO policies. However, SFAs must ensure that meal counts match actual participation and claims reflect the number of meals served. If a school is operating the NSLP/SBP for academic summer schools, edit checks are required as outlined in 7 CFR 210.8.

State Level Monitoring

64. *[Revised]* Are State agencies required to review SSO sites during the School Year (SY)?

Yes. State agencies must review at least one SSO site in operation at all SFAs scheduled for administrative review. The review may be conducted in the summer prior to or following the scheduled administrative review, although FNS encourages State agencies to monitor the SSO site the summer after the Administrative Review. For example:

Administrative Review Schedule	SSO site review
SY 2016/2017	Summer of 2016 or 2017
SY 2017/2018	Summer of 2017 or 2018

This may involve a second visit to the SFA to evaluate the SSO in operation.

State agencies are not required to conduct annual reviews of SFAs that operate under the SSO or to conduct any special reviews for these SFAs beyond the normal administrative review requirements of reviewing all SFAs during a 3-year cycle and reviewing at least one SSO site as a part of the review. However, State agencies are encouraged to review SSO sites even if an administrative review is not scheduled for that SFA, especially if there are significant operational problems.

65. Can an administrative review be scheduled during the summer to avoid making the second visit to the SSO site?

Yes, if the school is operating the NSLP on a year-round basis and both NSLP schools and SSO schools will be operating at the time of the review.

66. *[Revised]* How should State agencies review SSO sites for administrative review purposes?

The Administrative Review manual and accompanying forms provide guidance on reviewing SSO. The manual, *Supplemental Seamless Summer Option Administrative*

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Review Form and additional information on the administrative review process is available on PartnerWeb.

67. Should reviewers include findings from an SSO review in the annual FNS-640, *Administrative Review Data Report*?

No. Reviewers must not include findings from a review of an SSO site review into the annual FNS-640, Administrative Review Data Report. The State agency must issue a separate report of SSO findings to the SFA as an addendum to the Administrative Review report. FNS encourages State agencies to issue a report to the SFA of any SSO problems identified, as soon as possible, and provide a mechanism for corrective action.

While fiscal action for the SSO is computed separately from administrative review findings, the amount of fiscal action for the NSLP and the SSO must be combined to determine if the $600 disregard in 7 CFR 210.19(d) can be applied to any over-claim.

Program Access

68. How can SFAs operating an academic summer school attract children from the community who are not attending summer school?

Both in the approval process and in the review of sites, State agencies should ensure that schools approved as SSO sites make a reasonable effort to promote the availability and location of free meals to children in the community who will not be attending summer school.

SFAs applying to participate in the SSO must describe how each site will promote the availability of meal services to children in the community. The SFA should provide enough detail in its application so the method of promoting meal services to the public can be documented and confirmed later during a review. For example, if the SFA stated that an SSO site's meals would be advertised in a publication, a copy of the advertisement should be available. Also, documentation of public service announcements by radio or television stations, and copies of flyers provided to students or mailed to students' parents should be available.

Additionally, SFAs should ensure that their sites are welcoming and ensure that site staff understand that free meals are available to children in the community and not only to the children attending the academic program.

SSO sites seeking guidance on how to create outreach materials can use the Summer Meals Toolkit available at http://www.fns.usda.gov/sfsp/summer-meals-toolkit. Summer Meals materials include PowerPoint files, informational sheets, letters and marketing materials that can be modified and used to suit your specific needs.

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69. Once a summer school session has ended, can an SFA sponsor continue operating SSO to serve meals to the community?

Yes. SFAs are encouraged to continue to sponsor SSO school and non-school sites once summer school sessions have ended and offer meals to the community through the end of the summer. SFAs can also serve as a vendor to other sponsors in the community. If an SFA decides to discontinue all SSO operations at the conclusion of summer school but before the end of the summer, the SFA is encouraged to partner with another sponsor in the area (either another SFA or a sponsor under SFSP) to ensure that meals are available to children in the community through the end of the summer. SFAs may work with the State agency operating SFSP to coordinate such partnerships.

Reimbursement Rates

70. *[Revised]* Which reimbursement rates are used in the SSO?

Meals served under the SSO are reimbursed at the "free" rates prescribed by USDA for the NSLP, afterschool snacks served in afterschool care programs, and for the SBP. Supper meals are reimbursed at the NSLP's free lunch rate.

At camps operating the SSO, only those meals served to children who are eligible for free or reduced price school meals may be reimbursed at the free rate. Meals served to children at the camp site who are ineligible for free or reduced price meals are not reimbursable.

71. Will qualifying schools continue to receive the severe need breakfast rates under the SSO?

Yes.

72. Will eligible schools participating as SSO sites continue to earn the USDA Foods entitlement under NSLP?

Yes. Schools will receive the full USDA Foods allotment for both lunches and suppers.

73. Will schools participating in the SSO still receive the extra $.02 differential for lunch and supper meals?

Yes. In addition, lunches claimed under SSO may count toward the determination of the SFA's eligibility for the extra $.02 differential and the school's eligibility for the severe need breakfast rate.

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74. What rates will non-school sites receive?

In most cases, the SFA will receive the same reimbursement rates for non-school sites as for the school sites. When different schools within the SFA's jurisdiction qualify for different rates, such as the severe need breakfast rate, then the non-school site will earn the same reimbursement rates as the school within which attendance boundary the site is located. If the SFA is sponsoring a school site that is outside of its jurisdiction, the SFA will receive the same NSLP reimbursement rates that the school site earns during the regular school year.

75. Will SFAs certified to receive the performance-based reimbursement (6 cents) receive the additional reimbursement for lunches or suppers served under the SSO?

Yes.

76. Do SFAs serving summer meals under the SFSP receive higher reimbursement rates?

Yes. SFAs that serve meals as sponsors under the SFSP will receive slightly higher rates than schools operating the SSO. In addition, schools operating in an area with a rural designation receive an additional rate differential. For more information on rural designations, refer to SFSP 04-2015 v. 3, *Rural Designations in the Summer Food Service Program – Revised*, April 21, 2015, available at http://www.fns.usda.gov/sites/default/files/SFSP04-2015v3os.pdf. SFSP reimbursement rates are available at http://www.fns.usda.gov/sfsp/federal-register-documents/notices/view-all.

Reporting

77. How will SFAs report the meals served in the SSO to the State agency?

SFAs follow the requirements established by their State agency for reporting and claiming meals served under the SSO.

78. How will meals served under the SSO be reported to FNS by State agencies?

Meals will be counted as the number of reimbursable free meals served monthly under the SSO. State agencies must report the number of meals served by type on the FNS-10 electronic report as follows: include lunches and suppers served under the SSO in the meals reported on line 5a and on lines 5b1 and 5b2, if applicable, of the FNS-10. Please note lunch and supper meals cannot be reimbursed for the same day by the same site, except for camp and migrant sites.

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79. On which FNS-10 reports should State agencies include SSO activity?

SSO activity must be reported on both the 30-day and 90-day reports for each month that meals are served under the SSO. For the 30-day, report the total of actual and estimated meals; for the 90-day, report actual meals only.

80. Since the new NSLP and SBP rates for the upcoming SY are effective in July, how would the claims for June and July be handled?

SFAs and State agencies should refer to the NSLP regulations, at 7 CFR 210.8(c)(1), for combining claims of months with SSO activity. Since the NSLP rates change on July 1, the June and July claims cannot be combined. June meals served under the SSO would be included in the same claim as regular NSLP meals for June. If the SFA did not operate the regular NSLP in June but operated the SSO for 10 days or less, it could combine the June SSO meals on the May claim. Similarly, if it operates the SSO for 10 days or less during August, it could combine the July and August claims.

81. How will State agencies report meals served under the SSO on the FNS-777 report?

Since SSO meals are claimed under the NSLP and SBP on the FNS-10, financial activity related to these meals must also be reported under these programs on the FNS-777. SSO meals must be reported on the FNS-777 as follows:

- Report Status of Funds for lunches, suppers, and snacks in Column 14 - School Lunch;
- Report Status of Funds for breakfasts in Column 15 - School Breakfast.

82. Can a FSMC under contract with an SFA for NSLP/SBP meal service conduct the same administrative tasks for meals served under the SSO?

Yes. Assuming that the contract includes the SSO meal service, FSMC personnel must follow the regulations at 7 CFR 210.16, which describe permissible administrative tasks that the company can perform on behalf of the SFA. Further, all procurement requirements in 7 CFR 210.21 and 7 CFR 220.16 must be followed when contracting out operation of the SSO.

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