

Summer Food Service Program During the School Year

Frequently Asked Questions



Child Nutrition Program Waivers and Implementation

1. What waivers are currently in place for school year 2020-21 for the Summer Food Service Program (SFSP)?

The U.S. Department of Agriculture nationwide [waivers](#) were extended on August 31, 2020 for the Summer Food Service Program. The waivers allow for the following flexibilities for the SFSP through December 31, 2020, dependent on available funding:

- **Summer Food Service Program and Seamless Summer Program Operations through December 2020:** Allows the SFSP and the SSO to continue to operate through December 31, 2020, dependent on available funding.
- **Area Eligibility:** allows meals to be served at open sites in areas that do not meet the 50 percent eligibility requirement.
- **Non-congregate Feeding in the Summer Food Service Program and Seamless Summer Option:** Allows for off-site consumption of meals and serving models like grab-n-go, curbside pick-up, mobile/bus routes, and home delivery.
- **Meal Service Time Flexibility:** Provides flexibility for serving times for SFSP and SSO. Allows for serving multiple meals at once and/ or serving meals for multiple days at the same time. Sponsors must still establish meal service times or delivery times
- **Parents and Guardians to Pick Up Meals for Children:** Allows parents/guardians to pick-up meals and bring them home to their children.
- **Meal Pattern Flexibility in the Child Nutrition Programs:** Allows sponsors to claim for reimbursement even if a meal does not meet all meal pattern requirements or include all meal components. Sponsors must contact CDE School Nutrition for approval to use this waiver for school year 2020-21. Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-19.
- **Offer Versus Serve Flexibility in the Summer Food Service Program:** Allows offer versus serve to be used with the SFSP meal pattern. All SFSP sponsors have the option to implement offer versus serve.
- **Allow Area Eligibility for Closed Enrolled sites in the Summer Food Service Program and Seamless Summer Option:** Closed enrolled sites may determine eligibility through area eligibility rather than collecting income eligibility applications.
- **First Week Site Visit waiver for the Summer Food Service Program:** Sponsors are not required to visit each of their sites at least once during the first week of operation. This waiver applies to sites that successfully operated the SFSP in the previous year and SFSP sponsors in good standing that participate in the CACFP or NSLP.

Child Nutrition Program Options During School Year 2020-21

1. Are sponsors required to participate in the Summer Food Service Program?

Under the [COVID 19- Child Nutrition Response #56](#), school food authorities may choose to serve meals through the SFSP or SSO or may opt to participate under the National School Lunch and School Breakfast Programs. This waiver does not require school food authorities to transition to SFSP or SSO operations. Based on current funding, the SFSP or SSO is available to operate through December 31, 2020.

2. Where can sponsors learn more about the SFSP requirements?

More information about the SFSP can be found on the School Nutrition [SFSP webpage](#). For claim questions, contact: free&reducedpriceschoolmeals@cde.state.co.us. For general SFSP questions, contact: summermealprogram@cde.state.co.us.

3. What is the difference between the Summer Food Service Program and the Seamless Summer Option?

The main differences relate to the reimbursement rates and meal pattern requirements. A summary of program requirements for each program can be found in this [comparison chart](#).

SSO: All eligible meals provided are reimbursed at the NSLP/SBP applicable free rate and the NSLP/SBP meal pattern must be followed.

SFSP: All eligible meals provided under the SFSP are reimbursed at the established [SFSP rate](#). School Food Authority sponsors have the option to follow the NSLP/SBP meal pattern or the SFSP meal pattern. All other sponsors must follow the SFSP meal pattern.

4. Can sponsors operate the Summer Food Service Program for remote learning and the National School Lunch Program for in-person learning?

Awaiting USDA guidance.

5. Can sponsors operate the Afterschool Snack Program at sites serving meals under the Summer Food Service Program?

No. The Afterschool Snack Program is part of the National School Lunch Program and can only be operated at sites serving meals under the National School Lunch Program.

6. Can sponsors operate the Fresh Fruit and Vegetable Program at the same time as the Summer Food Service Program?

Awaiting USDA guidance.

7. Can sponsors operate the Special Milk Program at the same time as the Summer Food Service Program?

No. The Special Milk Program cannot operate at the same time as the SFSP.

8. Can sponsors operate the Child and Adult Care Food Program At-Risk Afterschool Meals Program at the same time as the Summer Food Service Program?

Yes. A sponsor may operate both programs as long as detailed records are kept on each program.

Meal Site Eligibility

1. What types of meal sites can be operated under the SFSP?

Sponsors may operate the SFSP at one or more sites, which are the actual locations where meals are served. There are three common types of sites: open sites, closed enrolled sites and camp sites. Based on the USDA [COVID-19: Child Nutrition Response #52](#), open sites are not required to meet the 50 percent eligibility requirement when need is identified in the community.

2. What type of SFSP sites should the sponsor apply for?

Sponsors have the option to determine which type of site will work best to meet the needs of their students and community. Sites that meet the area eligibility requirements may apply as closed-enrolled and provide meals only to students enrolled at the meal site. For example, a closed-enrolled site may be beneficial for schools offering in-person learning only. Sponsors may also apply for open or restricted open sites when implementing hybrid meal services, such as meals in the classroom and parent pick-up. Open and restricted open sites do not need to meet the 50 percent eligibility requirement when need is identified.

3. How are sites approved when competing for the same geographical area?

When determining which sites are approved to serve an area, state agencies are required to give priority to:

- Local SFA sponsors
- Government and private non-profit sponsors that have successfully operated in the prior year
- New government sponsors
- New private non-profit sponsors

Menu Planning

1. What meal patterns must be followed for the SFSP?

School Food Authority sponsors have the option to follow the [SFSP meal pattern](#) or the NSLP/SBP meal patterns. All other sponsors must follow the SFSP meal pattern.

2. Are sponsors able to apply for a meal pattern exemption waiver?

Yes. Sponsors that are unable to meet the SFSP meal pattern can apply for a meal pattern exemption by contacting [School Nutrition](#). Requests must be targeted and justified based on plans to support access to meals while minimizing potential exposure to COVID-19.

Civil Rights/Special Dietary Needs

1. Is the And Justice for All Poster required to be in each classroom if meal service is not taking place in the cafeteria?

The And Justice for All Poster is not required to be in each classroom. The poster must be visible to participants in the school building. If participants will not have access to the poster in the cafeteria (e.g. meal service only in the classroom), best practice would be to have the poster visible at the school building entrance. A pdf printable version of the poster can be found on [CDE School Nutrition website](#). As a best practice this school year, the poster should be printed in color and the correct size (11"x17").

2. Is the And Justice for All Poster required to be visible at each mobile stop or at an outdoor grab-and-go station?

Yes. The And Justice for All Poster is required to be visible at each meal site location. As a best practice this school year, the poster should be printed in color and the correct size (11"x17").

3. If meals are being served in the classroom, do teachers need to complete civil rights training?

Yes. Teachers must complete Civil Rights training and the sponsor must track this information. Training formats, such as the Meals in the Classroom Teachers Training memo, self-study guide and PowerPoint slide deck can be found on [CDE School Nutrition website](#).

4. Are schools required to accommodate special dietary needs when meals are served in the classroom or there are grab and go options?

Sponsors are required to continue to accommodate special dietary needs regardless of the meal service model. Best practices to consider include:

- Use a consistent process to separate and identify special dietary meals and communicate to all who will be involved with meal service; for example, teachers serving meals in the classroom.
- Assess menus to make sure accommodations can be made within a modified cycle menu, if applicable. For example, if the salad bar was previously used to accommodate many special diets, different products may need to be added to the menu.
- Assess the district's special dietary needs policy to ensure it still meets the needs of the sponsor and families. For example, if you did not allow special dietary needs forms to roll over from year to year previously, you could consider allowing it to streamline paperwork.
- Identify communication needs with school administrators, teachers, and parents. Resources can be found on the [special dietary needs webpage](#).

Procurement

1. What procurement flexibilities are available to purchase new food and supplies for the 2020-21 school year?

- Informal procurement methods (small purchase and micro-purchase) may be used if district/sponsor purchasing policies allow. For more information on methods of procurement, visit the [CDE School Nutrition Unit's Procurement Web Page](#).
- Work with your purchasing department or cooperative purchasing group to add new products to existing contracts if possible. New products can be added if adding those products is not a material change to the contract.
- Procurement without a competitive process may be used when a public emergency will not permit a delay resulting from a competitive solicitation (when you need the goods or services immediately). For non-competitive procurement, the district can negotiate directly with one vendor instead of soliciting multiple quotes, bids, or proposals. Non-competitive contracts cannot be longer than one year in length.

2. How do sponsors communicate with food vendors when they are unsure what products are needed for the 2020-21 school year?

- Be upfront and establish an open line of communication with your distributors, vendors, and brokers about your upcoming needs and unknowns.
- Use participation data from this past spring and summer to estimate quantities needed for the fall.
- Consider procuring products from local producers to shorten the supply chain.

3. Can sponsors purchase vended meals to use to supplement meals prepared by staff or if staff are sick and unable to prepare meals?

- Yes, vended meals (unitized meals with or without milk) can be purchased only from a vendor that is registered with the CDE School Nutrition Unit.

- Sponsors may use a noncompetitive, one-year contract to purchase vended meals for the 2020-21 school year.
- Contact Megan Johnson at johnson_m@cde.state.co.us for more information or to obtain the contract template.
- For more information on vended meals, visit the [FSMC and Vended Meals Web Page](#).

Meal Counting and Claiming

1. Are sponsors allowed to feed all kids for free or do meals need to be claimed based on the student's eligibility status?

Under the SFSP, all reimbursable meals served are free. Sponsors do not need to track meals based on the student's eligibility status.

2. How do sponsors accurately record and claim meals under the SFSP?

Sponsors must establish a point of service and record meals as they are served. Sponsors may use a [paper form](#) or their electronic point of service system to record meals by meal type each serving day.

3. If sponsors use an electronic point of service system, how do sponsors ensure the point of service system meets SFSP claim requirements?

Sponsors may use an electronic point of service system for SFSP but must ensure that students are not charged for a meal and count and claim all student meals at the free rate. Additionally, SFSP is open to all children age 0-18 and a child cannot be denied a meal if they are not in the system. The sponsor must determine a way to count and claim these meals (e.g. student visitor meal option).

4. How do sponsors record meals when multiple meals are distributed?

Sponsors can count meals on the day they are distributed for each meal type served. Sponsors are not required to have separate meal count forms for the days meals are intended to be eaten. For example, if 3 days' worth of meals are served, a sponsor will have one breakfast meal count form and one lunch meal count form that shows 3 days' worth of meals distributed at that site.

5. Is the USDA waiver to allow SFSP through December 31 retroactive to the beginning of the school year?

Awaiting USDA guidance.

6. What methods can sponsors use to track student meals for meals in the classroom?

Teachers may complete the [SFSP daily meal count form](#) or sponsors may use their point of service program. If a point of service program is used, a best practice is to provide a laminated classroom sheet with a dry erase marker for teachers to mark meals and then return to school nutrition staff to enter meal counts into the electronic POS.

7. Can intended days come before the operating day in which meals are served? For example, can meals provided on a Friday be counted and claimed for the preceding Wednesday and Thursday?

No. Meals cannot be given for preceding operating days and then be backdated for claiming purposes. The site has the option to offer meals at the end of a week for intended days the following week as long as all food safety measures and precautions are followed. "Intended days" are the days intended for the meals to be consumed.

Meal Service

8. What meals can be served under the SFSP?

Sponsors may serve up to two meals a day at open and enrolled sites. Allowable meal types include: breakfast, AM snack, lunch, PM snack, and supper. Sponsors may choose which combination of meals they would like to serve; however, serving lunch and supper on the same day is not allowed.

9. Can sponsors feed kids through a grab-and-go concept?

Grab and go is an allowable meal service method under the Nationwide Waiver to allow Non-congregate Feeding in the Child Nutrition Programs.

10. Is Offer versus Serve allowable with the SFSP meal pattern?

Yes, offer versus serve is allowable with the SFSP meal pattern and any SFSP sponsor has the option to implement this menu planning method.

11. Are sponsors able to provide weekend meals to students?

Awaiting USDA guidance.

12. Are sponsors able to serve all kids or only students within their school district?

Any child 18 years and younger may receive a free meal at an open SFSP site regardless of the school district they are enrolled in.

13. Can meals be served on non-school days?

Awaiting USDA guidance.

14. If students are in school for half of the day and then go home for the afternoon, can a grab and go lunch be sent home with the student?

Yes, the non-congregate meal flexibility allows students to be given a meal to eat off site.

15. Are there restrictions on the length of meal service?

The meal service time restrictions waiver allows sponsors to set meal service times that work best for their school and community needs.

16. What food safety guidelines should sponsors follow for back to school?

Your [local public health agency](#) (LPHA) is the ultimate authority on food safety related questions. It is important to contact the LPHA first since they are best connected to the current COVID-19 situation in their areas. It will be school district and, in some cases, building centric when establishing a plan for providing meals to students. Sponsors should work on appropriate guidelines for individual schools in their districts and run their plan by their LPHA for review and feedback.

For state-level guidance, consult the [Colorado Department of Public Health and Environment](#) (CDPHE). CDPHE offers helpful health safety resources including: [employee health screening form](#), [guidance for wearing masks](#), and [cleaning guidance including specific recommendations for schools](#).

For nationwide recommendations, the Centers for Disease Control and Prevention (CDC) published [What School Nutrition Professionals and Volunteers at Schools Need to Know about COVID-19](#) and [FAQ for School Administrators on Reopening Schools](#).

17. Should sponsors develop a staffing plan in case there is a COVID-19 outbreak among food service staff?

It is recommended that sponsors develop a staffing plan in case employees contract COVID-19. Wisconsin Department of Public Instruction published [Interim COVID-19 Cafeterias and Food Service Guidance](#) that includes guidance on creating a back-up staffing plan. Back-up staffing plan considerations include identifying staff that are part of a high-risk group, providing cross-training and identifying back-ups, breaking up staff in teams to limit exposure, etc. [School Nutrition Association \(SNA\)](#) has also published staffing considerations such as whether staffers are working parents who may not be available to work if children are doing remote learning and determining how many staff members will be needed depending on type of meal service.

18. What should sponsors do if their staff contracts COVID-19 and they are unable to prepare meals but their SFA is still operating?

Sponsors must notify their [local public health agency](#) (LPHA) once they are aware that a staff member has contracted COVID-19. Public health staff are trained in how to manage health information in order to protect privacy and will provide instructions on next steps to take. Sponsors should also follow the district's policy outlining what to do if a school staff member contracts COVID-19. If the school district needs guidance on what to include in their plan for COVID-19 cases and outbreaks, consult the following resources from Colorado Department of Public Health and Environment and Colorado Department of Education: [Cases and outbreaks in child care and schools](#), [School Decision Tree for COVID-19 Cases](#), and [Guidance Regardless of Phase](#).

To the maximum extent possible, sponsors should develop a back-up plan for providing meals to students if they are short staffed. The back-up plan could include contracting with a nearby SFA or [registered meal vendor](#) to see if they could provide meals in an emergency. Procurement without a competitive process may be used for an emergency, and the sponsor can contract directly with another SFA or registered meal vendor to provide meals. Other considerations include training substitute staff to help prepare meals when short staffed; planning simple menus of packaged shelf stable items that can be easily assembled in an emergency; and purchasing these items

Applications

1. What sponsors are eligible to participate in the Summer Food Service Program?

A sponsoring organization must be a public or private non-profit school food authority (SFA); a public or private non-profit college or university; a public or private non-profit residential summer camp; a unit of local, county, municipal, State, or Federal Government; or any other type of private non-profit organization. All sponsors must also be tax exempt and must demonstrate the administrative and financial ability to manage a food service effectively. SFAs that have not participated in the SFSP in the previous year are eligible to participate this fall.

2. How do sponsors apply to participate in the Summer Food Service Program?

Information forthcoming.

Reviews

1. Will CDE School Nutrition conduct school meal Administrative Reviews (ARs) in the 2020-21 school year?

School Nutrition will not conduct school meal ARs or Procurement reviews in the 2020-21 school year. [Sponsors](#) originally scheduled for an AR in the 2020-21 school year will be rescheduled over the next three years to fit in to the approved five-year cycle. A new review schedule is forthcoming.

2. Why are sponsors receiving a Summer Food Service Program review in the 2020-21 school year?

School Nutrition is required to conduct a review of sponsors operating the SFSP, including sponsors that operated the program during unanticipated school closures last spring and any new sponsor that operates the SFSP this fall. All sponsors that did not have a school meal administrative review in school year 2019-20 and did not operate SFSP in the previous year, are required to undergo a review. The SFSP review schedule will be updated soon. Review resources can be found on [CDE School Nutrition website](#).

Financial Management

1. Can sponsors provide a 'program-adult meal' to the teachers or adults serving meals in the classrooms?

This is allowable. Meals served to employees directly involved in the operation and administration of the breakfast and lunch programs (e.g., managers, cooks, servers, etc.), may be provided a meal at no charge. This is considered a fringe benefit attributable to program costs. It is at the discretion of the local sponsor to charge food service employees for their meal; the cost of these employee meals may be paid from program funds.

2. How should sponsors track program costs and income for the SFSP?

Sponsors must be able to account for the receipt, obligation, and expenditure of all SFSP funds. Sponsors must ensure that all SFSP reimbursements are being used solely for conducting non-profit food service operations. The SFSP [Financial Tracking tool](#) can be used to track program costs and income.

3. Can sponsors serve à la carte items during SFSP meal service?

Yes. The sale of à la carte items during a meal service is permitted. However, the non-program and program components of the food service operation must be tracked separately, accounting for the receipt, obligation, and expenditure of all SFSP funds. The sponsor must maintain accounting records documenting proper cost allocation between the program and non-program components of its food service operation.

4. If sponsors began charging students for meals while operating NSLP at the beginning of the school year can they credit accounts?

Awaiting USDA guidance.