

Summer Meals



Program Regulations

Simplified Cost Accounting: Final Rule

- Extends simplified cost accounting and reporting procedures
- Eliminate cost comparison requirements for determining sponsor payments
- Improved efficiency and reduces paperwork



Simplified Cost Accounting: Final Rule

Purpose

- Improve management of the Program
- Reduce paperwork for Program operators (sponsors)
- Facilitate and encourage participation by eligible sponsors
- Increase access to children in need of safe, healthy meals during the summer months



Simplified Cost Accounting: Final Rule

- Elimination of the cost comparison to determine sponsor reimbursements
- Establishment of a reimbursement rate of “meals times rate”
- Sponsors must still retain records of all costs for state agency review, rather than reporting the costs to the State agency



Simplified Cost Accounting: Final Rule

Proposed Rule

- Allowed state agencies to exempt SFA sponsors that participated in SFSP in the previous year and had no documented serious problems managing the SFSP or the NSLP from the annual budget submission requirement

Codified Rule

- State agencies may exempt School Food Authorities applying to operate the SFSP from submitting a separate budget to the state agency, provided that operation of the SFSP is included in the annual budget submitted for the NSLP
- Connecticut does not include SFSP in an annual NSLP budget, so the exemption will not be available



Simplified Cost Accounting: Final Rule

Maintaining a Nonprofit Food Service

- Not required to maintain a separate nonprofit food service account for the SFSP
- Sponsors must be able to document that they have maintained a nonprofit food service
 - Retaining records of all revenues received
 - Retaining records of all expenses paid
 - Records do not have to be regularly submitted, but must be retained on file, available for State agency and auditor review
 - Expenses paid from the nonprofit food service account must be allowable costs that are necessary, reasonable, and properly documented



Simplified Cost Accounting: Final Rule

Collection of Excess Funds

- **Excess Funds:** The difference between any advance funding and reimbursement funding, when advance funds received by a sponsor are greater than the reimbursement amount earned by the sponsor
 - These funds must be collected by the state agency
- **Unused Reimbursements:** The difference between the amount claimed for reimbursement and actual costs, should reimbursement exceed costs
 - FNS expects management of resources that does not result in a significant amount of unused reimbursement
 - Can be used to improve the meal service or management of the program
 - Can be used to pay allowable costs of other Child Nutrition Programs



Simplified Cost Accounting: Final Rule

State Agency Monitoring

- State agencies should determine if expenditures are allowable and consistent with FNS Instructions and guidance
- State agencies should determine if expenditures are consistent with budgeted costs and the previous year's expenditures
- State agencies should determine that reimbursements have not resulted in accumulation of net cash resources
 - A limit of one month's net cash resources for sponsors that operate for the summer months
 - A limit of three month's net cash resources for sponsors that operate Child Nutrition Programs year round
- State agencies are required to determine if the level of administrative spending is reasonable



Simplified Cost Accounting: Final Rule

Administrative Oversight at Approved Meal Services

- Clarified administrative oversight, rather than direct operational control
 - Administrative oversight: control over only the meal service provided and related activities, such as training staff on meal counting and recordkeeping procedures
 - Direct operational control: authority to hire or terminate staff



Simplified Cost Accounting: Final Rule

Options to Submit a Combined Claim

- Claims for 10 operating days or less in the initial month of operations may be combined with the claim for the subsequent month
- Claims for 10 operating days or less in the final month of operations may be combined with the claim for the preceding month
- Claims for 3 consecutive months may be combined, as long as this combined claim only includes 10 operating days or less from each of the first and last months of Program operations





USDA Policy Guidance Rescissions

SFSP 06-2018

Rescission of SFSP 01-2007: *Exceptions to Approving Sponsor Prior to Program Operations*



USDA Policy Guidance Rescissions

SFSP 01-2019

Rescission of SFSP 12-2011: *Waiver of Site Monitoring Requirements in the Summer Food Service Program*



USDA Policy Guidance Rescissions

SFSP 01-2019

Rescission of SFSP 04-2013: *Summer Feeding Options for School Food Authorities*



USDA Policy Guidance Rescissions

SFSP 01-2019

Rescission of SFSP 06-2017: *Meal Service Requirements in the Summer Meal Programs, with Questions and Answers - Revised*



USDA Policy Guidance Rescissions

SFSP 01-2019

Rescission of: *Summer Food Service Program (SFSP) Waiver for Closed Enrolled Sites*



So, where does that leave us?



Next Steps...



Key Policy Guidance to Review



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



Summer Meals Programs 2019 Annual Training Policy Guidance Spotlight

CSDE Operational Memoranda for the SFSP (CSDE OMs and USDA Policy Guidance)
<https://portal.ct.gov/SDE/Lists/Operational-Memoranda-for-the-SFSP>

Summer Food Service Program Regulations (7 CFR 225)
<https://www.fns.usda.gov/part-225—summer-food-service-program>

USDA Administration Guide for the Summer Food Service Program
https://fns-prod.azureedge.net/sites/default/files/sfsp/SFSP_Admin_Guide_Sept2016.pdf

- Attachment 4 (on page 155) lists key policy guidance, some of which has been updated more recently than the handbook

USDA Simplified Cost Accounting and Other Actions To Reduce Paperwork in the Summer Food Service Program
<https://www.regulations.gov/document?D=FNS-2013-0026-0024>

USDA Policy Guidance webpage
<https://www.fns.usda.gov/sfsp/policy>

USDA Policy Guidance rescinding former Summer Meals Program operational waivers

- SFSP 06-2018
<https://www.fns.usda.gov/sfsp/summer-food-service-program-memoranda-rescission-sfsp-01-2007-and-sfsp-06-2015>
- SFSP 01-2019
<https://www.fns.usda.gov/sfsp/summer-food-service-program-memoranda-rescission>

USDA SFSP 05 – 2017 SFSP Program Questions and Answers
<https://www.fns.usda.gov/sfsp/summer-food-service-program-questions-and-answers-0>

USDA SFSP 06 – 2017 Meal Service Requirements in the SFSP, with Questions and Answers – Revised
<https://www.fns.usda.gov/meal-service-requirements-summer-meal-programs-questions-and-answers-%E2%80%93revised>

USDA SFSP 04 – 2013 – Revised Summer Feeding Options for School Food Authorities
<https://www.fns.usda.gov/summer-feeding-options-school-food-authorities>

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