

# **School Year 2021 COVID-19 Auditing Guidance for SUMMER FOOD SERVICE PROGRAM (SFSP)**

## **GENERAL INFORMATION**

- Sponsor training is required.
- Timesheets are required for all personnel.
- Requires budget within online agreement.
  - Requires separate accounting code with fund source 5170, revenue function code 5170 and expense function code 9340.
- Journal entry required for transfer of inventory and staff salaries.
- Daily Tally Sheets are required. (POS system is allowed for on-campus meal service.)
- HACCP Food Safety and Record Keeping are required.
- Menus, receipts, and production records required.
- Inventory must be maintained.
- **Reimbursement Rates through FY20 (FY21 rates will begin January 1, 2021)**
  - \*Breakfast \$2.375, \*Lunch/Supper \$4.1525 \*Snack \$.9775

## **GUIDANCE RELATED TO COVID-19 NATIONWIDE WAIVERS AND MEMOS**

- **Meal Service Time Flexibility - Waiver Response #1, #50: expires December 31, 2020**
  - Flexible serving times to serve multiple meals at one time with established service/delivery times.
- **Non-congregate Feeding - Waiver Response #2, #22, #44, #54, #61 expires June 30, 2021**
  - **Q&A #1, Meal Delivery:** With State Agency approval
    - Direct to homes via mail, or delivery service, hand delivered by school staff, volunteers, community organizations or others. Only available to SFA sponsors of school sites.
    - Postage or delivery fees are allowable expenses.
    - Must obtain written consent from households.
    - Allows two meals per day, per child up to one week at a time.
- **Meal Pattern Flexibility - Waiver Response #4, #13, #24, #26, #38, #45, #53, #63, #70– State Approval –expires June 30, 2021**
  - Operators must get advance approval from their State Agency.
    - **Meal Pattern Waiver Requests were emailed from [jragan@alsde.edu](mailto:jragan@alsde.edu) on Tue 9/15/20 at 11:45 a.m.**
  - State agencies can only grant this waiver on case-by-case basis and must inform their regional office when, where, and for which components the waiver is in effect.
  - USDA instructs states to consider if the request is due to supply issues.
  - **Response #70 Sponsors may serve one type of milk without requesting a State waiver.**
- **Parent/Guardian Pickup - Waiver Response #5, #25, #47, #55, #62 – expires June 30, 2021**
  - Parents/Guardians may pick up meals without child.
- **Onsite Monitoring - Waiver Response #10, #11, #15, #30, #31, #42, #43, #49, #65 - Expires June 30, 2021**
  - **Response #10, #15, #30, #42, #49, #65**
    - Waives the requirement for an in-person site visit during the first week of a site’s operation and the review of the site’s food service within the first four weeks of operation.
    - Sponsors must continue to ensure integrity to the maximum extent practicable through remote activities, such as through desk audits.
  - **SP 05-2020 #24**
    - Alternatives for onsite reviews include State and local Program operators conducting alternative observation using video or photos and/or pictures of meal preparation and meal service. States may also conduct interviews with staff and Program participants to verify information in photos via telephone or video conference.
  - **Response #11, #31 #43**
    - Waives the in-person component of the state agency’s required monitoring activities. States must continue to ensure integrity to the maximum extent practicable through remote activities, such as through desk audits.

## **School Year 2021 COVID-19 Auditing Guidance for SUMMER FOOD SERVICE PROGRAM (SFSP)**

- **Response #15** Waiver applies to Sites that successfully operated SFSP the previous year and SFSP sponsors in good standing that successfully participate in the CACFP or the NSLP.
- **60-Day Reporting Requirement – Waiver Response #12 – No expiration date**
  - This now allows 90 days rather than 60 days for submission of reports.
  - States and operators are encouraged to meet the original deadline wherever possible.
- **SFSP 05-2020: Q&A Related to #7-#12 CNP Monitoring and Reporting Waivers**
  - Local Program operators participating under the waivers are required to maintain records to document compliance with Program requirements. Maintain documentation of participation for future reviews
- **SFSP 06-2020 – Q&A related to CNP Response #1-#3 Mealtime, Non-congregate Feeding and Meal Pattern Flexibility**
  - Allows operators to serve meals in bulk with instructions provided.
  - Impact Reports must be submitted within a year of the waiver.
    - **Surveys were emailed from [jragan@alsde.edu](mailto:jragan@alsde.edu) on 7/4/2020 at 2:39 p.m.**
  - All locations of meal service must be approved on the online agreement.
  - Local Program operators participating under the Meal Pattern Flexibility waiver are required to maintain records to document compliance with Program requirements should maintain documentation of their participation for future reviews.
- **SFSP 07-2020 Q&A #3 Guidance related to Meal Service during Coronavirus,**
  - **Meal delivery direct to homes:** Must be approved by State Agency
    - Allows direct to home delivery via mail or delivery service, and hand delivery by school staff, volunteers, community organizations or others.
    - Sponsor must obtain written consent from households and adhere to confidentiality guidelines.
    - Postage or delivery fees are allowable expenses.
    - Meals do not need to be shelf stable for meal delivery, but food safety requirements must be met.
  - Meal service times are waived.
  - Confirms SFAs may operate two programs if different meals are served.
  - Allows two meals per day, per child up to one week at a time.
  - Meals may be served during weekends and holidays.
  - Public notification of all sites is required.
  - Accommodations for limited English proficiency, language assistance or other special needs.
  - Sponsors may keep operations going even if schools implement SFSP or SSO and they are allowed to distribute multiple meals in conjunction with other programs.
- **Area Eligibility for Closed Enrolled Sites – Waiver Response #14, #32, #46, #48, #52, #60, #64 – Expires June 30, 2021**
  - Allows closed enrolled sites to determine site eligibility through area eligibility (instead of collecting income eligibility applications).
  - States must continue to work with sponsors and operators to target benefits to children in need.
  - These flexibilities do *not* end as soon as the public health emergency ends.
  - **Response #32, #52, #64**
    - Extends all individually-issued state waivers allowing SFSP and SSO sponsors in good standing to operate open summer meals sites located in areas that do not meet the definition of “areas in which poor economic conditions exist,” or areas where more than half of children are eligible for free or reduced-price meals.
  - **Response #32, #60**
    - States must continue to work with sponsors and operators to target benefits to children in need.
- **Allow Offer Versus Serve (OVS) – Waiver Response #16, #51, #67 – Expires June 30, 2021**
  - Waives the limitation on the use of OVS to SFAs.
  - Allows the use of OVS by both non-SFA and SFA sponsors in good standing.
  - Provides details of SFSP OVS meal service parameters.
- **Meal Service Time Restrictions – Waiver Response #17, #50, #66 – Extended to December 31, 2020**
  - Waives Federal rules on the amount of time that must elapse between the beginning of one meal and the beginning of the next, and the duration of a meal service.
  - Sponsors are still required to establish meal service times for each site.

## **School Year 2021 COVID-19 Auditing Guidance for SUMMER FOOD SERVICE PROGRAM (SFSP)**

- **SFSP 08-2020 Q&A related to Meal Service**
  - CACFP Sites may operate as SFSP sites.
  - New Sites may be approved without pre-approval review.
  - The nondiscrimination statement must appear on all informational materials.
  - Racial and ethnic data can be collected through school enrollment/ALSDE information/DHR-SNAP
  - Operators must make meal accommodations for participants with disabilities.
- **SFSP 10-2020 Q&A Provides clarification on Response. #14-17 Area Eligibility, Meal Service Time Restrictions**
  - Confirms that the meal service time waiver and non-congregate waiver allows for multiple meals.
  - First week site visit waived for sponsors in good standing.
  - OVS may be used if sites implement it correctly.
  - Confirms that the meal service time waiver and non-congregate waiver allows for multiple meals.
- **SFSP 11-2020 Q&A related to requirements and elements of the law addressed by waiver**
  - Relates to transition to summer program, including completion of required application.
  - Waivers and flexibilities are extended.
  - Home deliveries should not treat each home as a site like stops on a mobile route are.
  - Meal delivery guidelines still apply.
- **SFSP 12-2020: Q&A Related to Food Service Management Company (FSMC) Contracts and Allowable Costs**
  - Guidance for allowable expenses and contract extensions.
  - Confirms that costs for meal deliveries are allowable and all such purchases must continue to meet the required criteria of being reasonable, allocable, and necessary.
- **SFSP 13-2020: Q&A Related to School reopening guidance, August 21, 2020**
- **Food Service Management Contracts and Allowable costs – Waiver Response #19 – Expires September 30, 2020**
  - Allows FSMC contracts that may expire on or around June 30, 2020 to be extended through SY2020-2021 (to June 30, 2021) using emergency non-competitive procurement.
  - Contracts negotiated or extended through emergency procurement may not be renewed
  - Confirms that costs for meal deliveries are allowable and all such purchases must continue to meet the required criteria of being reasonable, allocable, and necessary.
- **Waiver Response #56 Allows SFSP Operations through December 2020; Waiver Response #59 through June 2021**
- **Response #57, #69**
  - Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and provide Flexibility for Pre-Approval Visits in the SFSP-COVID-19 SSO/SFSP.
- **SFSP 14-2020 Q&A Related to SSO/SFSP operations through December 31,2020 extended to June 30, 2021**
  - Allows meals served through NSLP/SBP this school year before August 31 to be reimbursed through SFSP.
  - Allows SFAs to operate NSLP/SBP at some schools and SFSP at other schools.