



Georgia Department of Early Care and Learning

2 Martin Luther King Jr. Drive, SE, Suite 754, East Tower, Atlanta, GA 30334
(404) 656-5957

Nathan Deal
Governor

Amy M. Jacobs
Commissioner

MEMORANDUM

To: Sponsors Participating in the Summer Food Service Program (SFSP)

From: Falita S. Flowers, Nutrition Services Director (*Original Signed*)

Date: March 26, 2015

Subject: Assessing Costs in the SFSP

Legal Authority: USDA Policy Memorandum, SFSP 11 - 2015

The attached tip sheet on “Assessing Costs in the Summer Food Service Program (SFSP)” provides guidance on the process Bright from the Start: Georgia Department of Early Care and Learning (DECAL) and SFSP sponsors should use when considering proposed uses of the nonprofit food service account funds for SFSP-related costs.

DECAL and sponsors have the discretion to determine the allow-ability of a sponsor’s use of nonprofit food service account funds to pay for costs by following cost principle guidelines. In determining what proposed costs and related activities may be supported by the nonprofit food service account, SFSP sponsors should assess the allow-ability of costs by considering the activity’s impact in supporting the operation and/or improvement of the SFSP. In doing so, SFSP sponsors must consider whether the proposed cost is reasonable, necessary, and allocable in accordance with 2 CFR Part 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart E – Cost Principles.”

The cost principles serve an extremely important function in considering proposed costs and assisting program operators in better understanding how nonprofit food service account funds are being used. The cost principles must be used for the purpose of cost determination and are not intended to dictate the extent of financial assistance for a particular cost objective.

For questions concerning this memorandum, please contact Sonja Adams, Policy Administrator at (404) 651-8193.

cc: Deidria W. Bolden, Assistant Commissioner for Federal Programs and Administration, DECAL

Assessing Costs in the Summer Food Service Program (SFSP)

Introduction

Office of Management and Budget (OMB) Guidance under 2 CFR Part 200 “Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart E – Cost Principles”; requires grantees receiving Federal funds to consider the following factors when determining the allow-ability of costs:

- ✦ Be necessary and reasonable for proper and efficient administration of the Programs
- ✦ Be allocable to Federal awards applicable to the administration of the Programs
- ✦ Be authorized and not prohibited under State or local laws

Selected Items of Cost

Typical allowable operating and administrative costs in the SFSP include:

- ✦ **Operating Costs**
 - ✦ Compensation for Program labor
 - ✦ Food and nonfood supplies (e.g., napkins, trays, utensils) for SFSP meals
 - ✦ Facilities service costs (e.g., rental of school food service facilities for dining purposes only and food service equipment)
 - ✦ Repair and maintenance equipment costs attributable to the SFSP
 - ✦ Maintenance costs of rented facilities (not in rental fees),
 - ✦ Utility costs in the operation of the facility for the SFSP (not in rental fees)
 - ✦ Transporting children or food to the feeding site (e.g., mileage reimbursement)
 - ✦ Depreciation cost of nonexpendable equipment
- ✦ **Administrative Costs**
 - ✦ Planning, organizing, and managing a food service operation under the SFSP

Items considered unallowable include:

- ✦ Losses arising from uncollectable accounts including when reasonable efforts have been made to collect them
- ✦ Payment of overclaims, fines, and/or penalties resulting from Program violations
- ✦ Entertainment (e.g., social activities, amusements)
- ✦ Salary and other expenses of the State and local legislators
- ✦ Costs not included in the sponsor’s budget as approved
- ✦ Capital expenditures (e.g., acquisition of land and buildings, the alteration of existing facilities, or nonexpendable equipment)
- ✦ Purchasing costs for vehicles
- ✦ Fundraising (i.e., expenses incurred to obtain contributions)
- ✦ Rental costs of school food service facilities or equipment if rental agreement includes option-to-purchase, and periods outside of SFSP operation
- ✦ Costs for meals in excess of the number of meals eligible for reimbursement

A RESOURCE FOR SFSP SPONSORS

Basic Guidelines for Determining Allowability of Costs

Helpful Tip

Costs can be allocated as either direct or indirect. Direct costs are those that are related entirely to the SFSP. Indirect costs are those that may be assignable to the SFSP and other non-Program objectives.



Helpful Tip

For costs not included in the list of unallowable costs in the FNS Instruction 796-4 (Rev 4), sponsors and States have the discretion to determine the allow-ability of using nonprofit food service funds to pay for such costs following cost principle guidelines.

Additional Resources

**SFSP FNS Instruction
796-4, Rev 4**

**SFSP 2015 Administrative
Guidance for Sponsors (Ch. 4)**

**Contact your State agency for
additional assistance and
support.**

Determining Allow-ability of Costs Process

When considering proposed uses of nonprofit food service account funds for SFSP-related costs, the following is a list of assessment questions to assist sponsors in determining if costs are allowable under Federal cost principles; i.e., necessary, reasonable, and allocable.

- ✚ What is the priority status for use of the nonprofit food service account?
 - ✚ Is the food service operation achieving its objective, the service of reimbursable meals?
- ✚ What product/service is being considered for acquisition?
- ✚ How does this product/service directly benefit the operation and/or improvement of the food service program and its priorities (i.e., encourage the service of reimbursable meals)?
- ✚ Is the cost essential to fulfill regulatory requirements for proper and efficient administration of the SFSP?
- ✚ What is the estimated cost of the product/service? Would a prudent person in like circumstances opt to incur the cost?
- ✚ If it is a shared cost between the SFSP and other non-program objectives, is the pro-rated portion assigned to the SFSP a fair measurement of the SFSP's benefit from incurring the cost?
- ✚ What alternative options through low/no cost ways to address the need have been taken (i.e., purchasing low/lower cost items, using the service of volunteers, etc.)
- ✚ Would the proposed cost divert nonprofit food service account funds from supporting food service operation staff time and effort, thus impair or diminish the delivery of the food service operation?
- ✚ If applicable, is the proposed depreciation cost of nonexpendable equipment equitable considering the use of assets and the benefits to the SFSP?
 - ✚ Is the method of computing depreciation consistently applied for all like nonexpendable equipment?

Summarizing a Cost Assessment

To complete an assessment of a proposed cost, both the sponsor and State agency should summarize the assessment of the cost, including why the cost is allowable (i.e., necessary, reasonable, and allocable) in light of the responses to the questions above.

This summary would assist the sponsor in communicating a request and the State agency in communicating a decision for each proposed cost to the nonprofit food service account and provide supporting documentation upon request by FNS and/or a Federal/State auditor.