



Unit 3: Administering the Summer Food Service Program

2024

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Introduction

The SFSP regulations describe a variety of administrative requirements for State agencies and sponsors to manage the Program, increase operational efficiency, and make SFSP work better. Unit 3 describes the State agency's requirements for reporting Program information to FNS and monitoring the performance of sponsors and sites. Unit 3 also addresses the oversight responsibilities of sponsors, with guidance on hiring, training, monitoring, payments and financial management, and recordkeeping. For term and acronym definitions in this unit, see *Introduction to the Summer Food Service Program Administration Guide* and *Appendix 1*, respectively.

Administration at the State Agency Level

State Agency Reporting Requirements

7 CFR 225.3(e), 225.4, 225.8

Coordinated Services Plan

Each State agency must establish a coordinated services plan, or CSP, to coordinate the statewide availability of services offered through SFSP and Summer EBT, to aid participants in accessing all Federal, State, Tribal, or local programs for which they are eligible. Only one plan per State is required in States where more than one State agency administers the programs.

The CSP must include a description of who will be administering the programs, how they will coordinate outreach and programmatic activities to maximize Program reach, including metrics to assess such reach and coverage, and the State agency's plans to partner with other Federal, State, Tribal or local programs.

States must notify the public of their CSP and make it available on their website. The initial CSP must be submitted to FNS no later than January 1, 2025, with updates submitted annually when significant changes are made to the plan, and otherwise no less than every 3 years.

Program Management and Administration Plan

Each State agency must develop a Program management and administration plan, or MAP, that meets the minimum requirements outlined in 225.4(d). Plans must be submitted to FNSRO for approval by February 15 of each year. Upon FNS approval of the plan, the State agency must be notified of the level of administrative funding which it will receive, and be allowed to withdraw Program funds and receive commodity donations from the Department.

Data Collection Related to Sponsors

Each State agency must submit to FNSRO a list of potential private non-profit organization sponsors by May 1 of each year. This list must include the sponsor's name, sponsor's address, geographical areas proposed to be served, proposed number of sites, and available details, including address, dates of operation, and estimated daily attendance, for each proposed site.

The State agency must also notify the FNSRO, within 5 working days after they approve each private non-profit organization to participate as a SFSP sponsor, providing updated information on each site.

Financial Reports

Each State agency must submit to FNS a quarterly Financial Status Report (FNS-777) on the use of Program funds. The State agency must submit these reports no later than 30 days after the end of each fiscal year quarter. No later than 120 days after the end of the fiscal year, each State agency must submit to FNS the final Financial Status Report (FNS-777).

Final Report on SFSP Operations

Each State agency must submit to FNS a final report on SFSP Operations (FNS-418) for each month, no more than 90 days following the last day of the month covered by the report. This report must include any upward and downward adjustments that were made to Program funds claimed.

Summer Meals Site Finder

During the summer operational period, FNS collects summer meal site information from State agencies on the Summer Food Site Locator form FNS-905. This form, which may only be completed by State agencies, collects details about each site.

Data are integrated into public facing web tools, including the Summer Meals for Kids Site Finder, <https://www.fns.usda.gov/meals4kids>. This tool was developed to help children, parents, and others quickly and easily find summer meal sites near them.

Beginning in summer 2025, State agencies will be required to submit to FNS a list of open site locations and their operational details on the FNS-905, by June 30 of each year or a later date approved by the FNSRO.

State agencies will also be required to provide a minimum of two updates during the summer operational period. FNS encourages State agencies to submit weekly updates if there are any changes to the State agency's data to ensure families have the most up-to-date site information.

Additional State Agency Requirements

7 CFR 225.18(f)

State agencies may establish additional Program requirements, as long as these are consistent with Federal requirements. Any additional State requirements must be submitted for approval to FNSRO at least 30 days before implementation. The request must include:

- a description of the additional State agency requirement, including the affected Program participants;
- a justification as to why the additional State agency requirement is necessary; and
- an assurance that the additional State agency requirement will not create barriers to participation or deny access to eligible children.

FNSRO approval is required prior to implementation of the State requirement. For additional information, see SFSP 06- 2013 - REVISED, *Additional State Agency Requirements in the Summer Food Service Program*, January 24, 2013, <https://www.fns.usda.gov/sfsp/additional-state-agency-requirements-summer-food-service-program>.

Monitoring Responsibilities

State agency Reviews of Sponsors and Sites

7 CFR 225.7(e)

In addition to pre-approval visits described in Unit 2: Applying to the SFSP, State agencies must complete reviews of sponsors' Program operations. The reviews require visits by the State agency's monitors to the sponsor's sites and central office. To determine which sponsors and sites to review, the State agency must, at a minimum, consider the sponsors' and sites' current and previous Program performance, whether they operate congregate or non-congregate meal services, and findings from previous reviews. For more

information, see SFSP 08-2023, *Guidance on Site Selection Criteria during Sponsor and Site Reviews in the Summer Food Service Program*, May 25, 2023, <https://www.fns.usda.gov/sfsp/site-selection-criteria-monitoring-reviews>.

A State agency review of site operations should involve observing the meal service operations and the records at the site. A review at the sponsor level should involve a review of the records maintained by the sponsor. All sponsors must make their records available for the State agency's review and must implement all corrective actions recommended by the State agency. The results of a State agency review may affect the amount of reimbursement a sponsor receives.

As part of the sponsor review, the State agency must validate the sponsor's meal claim utilizing a record review process that includes, at a minimum, reconciling daily receipts, daily meal counts from sites, and the sponsors' claim consolidation spreadsheets against the meals claimed for reimbursement by the sponsors for periods under review.

State agencies must also ensure that claims submitted for reimbursement are properly payable, which means that the sponsor's records justify all costs and meals claimed. Corrective action must address any issues related to claiming issues and other areas of noncompliance.

For more guidance on meal claim validations, see SFSP 05-2023, *Best Practices for Meal Claim Verification and Ensuring Properly Payable Claims in the Summer Food Service Program*, April 3, 2023, <https://www.fns.usda.gov/sfsp/best-practices-meal-claim-verification-payable-claims>. The recorded webinar, *Best Practices for Meal Claim Verification of Self-Prep Sites*, <https://www.fns.usda.gov/sfsp/meal-claim-verification-self-prep-sites>, provides more detail about this guidance.

Administration at the Sponsor and Site Levels

Staff Selection

Site Staff

Prior to Program operation, sponsors should consider the various needs in order to operate a successful program. The size and type of a sponsor's SFSP will dictate many of the sponsor's staffing needs. Depending on a sponsor's program, many positions will require only part-time employment, particularly in the planning and close-out phases. Varied opening and closing dates of individual site operations also affect staffing needs.

Each sponsor must provide adequate personnel to meet its unique circumstances and ensure successful Program management and monitoring. For example, monitors are critical to the successful operation of SFSP sites. Monitors visit sites on a regular basis and observe meal service operations. They are the "eyes and ears," providing valuable feedback about how the sites are operating. To meet Program monitoring requirements, FNS recommends no less than one monitor for every 15 to 20 sites in urban areas. The number of monitors necessary for rural sites may increase depending upon the geographic area to be covered.

Food Service Staff

Sponsors who prepare meals on site or in a central kitchen are responsible for choosing staff, including a food service manager, food production staff, and general kitchen help. The number of food service employees will depend on the number and type(s) of meals prepared. The following daily staffing schedule is provided as a guide for a Program serving lunches and snacks.

Table 1. Sample Daily Staffing Schedule

Number of Meals	Hours of Labor	Staff Needs
1-50	6-8	1 full-time employee

Number of Meals	Hours of Labor	Staff Needs
51-100	8-10	1 full-time employee 1 part-time employee
101-200	12-20	2 full-time employees 1 part-time employee
201-300	20-24	3 full-time employees 1 part-time employee

Full-time employees can be scheduled for only the hours they are needed and may not be required to work an 8-hour day. Part-time employees may be optional or as needed, based on menu requirements.

The range of hours for labor varies based on the skills of the food service employees and the convenience of foods used in the menus. If the sites serve breakfast, add 1 hour of labor for every

50 breakfasts prepared. Sites require less time for labor when serving snacks than when serving breakfast or lunch.

Food production employees will have food preparation duties and must be shown how and when to fill out the necessary records. They must know how to use recipes and meet the necessary meal pattern requirements. It is also important that staff be able to recognize complete meals and food safety guidelines.

Other personnel will have food service or cleanup duties and responsibilities. Write down the requirements of the job and go over the schedule of activities. A sample position description for a Cook is provided in Appendix 2. For the position of Food Service Manager, consider someone with a food production or nutrition background with food service experience.

Here are tips for selecting food service staff:

- Determine the number of staff you will need. The type of employee and the amount of experience needed will vary with the duties each will perform.
- Use qualified volunteers, such as parents or supervisory adults, to help you operate the Program. These individuals may offer help during food service and in supervising the children while they eat. Parental involvement should be encouraged. Parents often see their involvement as a benefit too.

- Ensure all food service employees meet the health standards set by local and State health authorities.
- Develop a job description for each food service position that describes duties and responsibilities for the position.

Staff Duties

The following are examples of duties and responsibilities of the director, assistant director, bookkeeper, monitor, and site supervisor. When running smaller Program operations, sponsors may consider having one staff member fill various positions, as appropriate. Sponsors needing more specific staffing guidance should consult with their State agency.

Director Responsibilities:

- Attend State agency training annually.
- Hire, train, and supervise staff.
- Provide overall management and supervise the SFSP.
- Select sites and determine which type of meal service is appropriate.
- Determine whether there is a need for rural non-congregate meal service, including hybrid models and targeted service in areas that do not qualify as areas in which poor economic conditions exist.
- Ensure that children's eligibility information at conditional non-congregate sites and camps is collected in order to support reimbursement claims.
- Ensure site supervisors know the menu and how meals, vended or self-prep, will be provided.
- Correspond with the State agency.
- Coordinate with other organizations and conduct promotion efforts, consistent with the State agency's CSP.
- Arrange for food preparation or delivery.
- Ensure that all monitoring requirements are met.
- Adjust meal orders.
- Submit claims for reimbursement.
- Ensure compliance with Civil Rights requirements.

- Handle all negotiations with vendors for purchased meals.
- Coordinate and delegate outreach responsibilities.
- Ensure all Program documents are maintained for 3 years plus the current year.
- Ensure the State agency has current site information that reflects the operation of each site, including changes in meal service types, meal service times, and the average number of children served.
- Ensure the sponsor's office and sites display the "And Justice For All" poster.

Assistant Director Responsibilities:

- Provide initial and ongoing training for sponsor and site personnel.
- Design forms for recordkeeping purposes.
- Maintain liaison with vendor to adjust delivery of meals to the site.
- Check claims for reimbursement.
- Maintain time and attendance records of staff.
- Maintain records on number of meals served.
- Ensure area schools have access to FNS materials.
- Schedule monitors' visits.
- Check monitors' reports.
- Prepare weekly summaries of monitoring efforts.
- Provide ongoing training for monitors.
- Visit sites with monitors.
- Determine need for and following through on corrective action.
- Review the meal counts submitted by sites for unusual meal count patterns.
- Supervise monitors.
- Report site problems to the director.

Bookkeeper Responsibilities:

- Maintain the following records:
 - Daily site reports, invoices, and bills;
 - Food costs;

- Labor costs;
- Administrative costs;
- Costs of transporting children to meal service sites in rural areas;
- Costs of home delivery for non-congregate meal services;
- Other costs; and
- Program income.
- Prepare reimbursement vouchers.
- Prepare payroll.
- Purchase office supplies.

Monitor Responsibilities:

- Check on-site operations to ensure that site personnel maintain records.
- Ensure the site operates in compliance with Program requirements.
- Conduct pre-operational visits, as described in 225.15(d)(2).
- Visit the sites within the first 2 weeks of meal service operations, as described in 225.15(d)(3).
- Review meal service operations at each site within the first 4 weeks of operation, as described in 225.15(d)(4).
- Complete required visits and reviews on State agency approved monitoring review forms.
- Report unresolved or critical issues to management.
- Conduct additional visits to sites, as necessary, to provide technical assistance.
- Suggest corrective actions to resolve problems.
- Ensure that sites take corrective actions.
- Conduct trainings for new site staff, as necessary.

Site Supervisor Responsibilities:

- Attend sponsor training.
- Ensure Civil Rights requirements are properly implemented.
- Be on site for the entire meal service, except for non-congregate meal service sites using delivery services.
- Inform director or assistant director of field trips.

- Communicate changes in meal service to director or assistant director.
- Serve meals.
- Clean up after meals.
- Ensure safe and sanitary conditions at the site.
- Ensure the safety of food, and comply with local health and safety standards.
- Receive and account for delivered meals.
- Ensure that children eat all meals on-site at congregate sites.
- Plan and organize daily site activities, including nutrition education for congregate sites.
- Implement alternate meal service arrangements during inclement weather.
- Take accurate meal counts at point of service, unless an alternate system that provides an accurate count has been approved by the State agency.

Volunteer Opportunities

Volunteers provide a great support system for the Program, as they can assist with a number of services.

Promote Access

Volunteers can help with promotion by posting fliers in their neighborhood, posting messages on social media or other online forums, writing letters to their local newspaper in support of the Program, and serving as “Summer Meal Spokespeople” throughout their community.

Site Supervision

Trained volunteers can serve as site supervisors. See the *SFSP Site Supervisor’s Guide*, <https://www.fns.usda.gov/sfsp/site-supervisor-guide>, for a more detailed overview of this position.

Meal Preparation

Sponsors preparing their own meals can use volunteers for meal preparation activities. Volunteers can receive free meals if they are performing food service duties in accordance with Program regulations at 7 CFR 225.15(b)(3)(iii). See *Meal Preparation Options* in Unit 4: Operating the Meal Service for the SFSP, for more information about self-prep.

Meal distribution

Volunteers may distribute meals for non-congregate sites that provide delivered meals to children's homes.

Site Activities

Volunteers can bring their unique expertise and interests to the Program by providing site activities.

Volunteers can coordinate an art project, give a musical performance, provide a nutrition lesson, read a story, or host an athletic competition for the children participating at congregate meal sites. Site activities can be regular (for example, every Friday could be "Music Day") or a one-time affair, depending on the volunteer's preference.

Accurate point of service counts

Volunteers can help the site supervisor maintain accurate point of service meal counts by counting meals at the actual point of service (i.e., meals are counted as they are served), to ensure that an accurate count of meals served is obtained and reported. Counting meals at the point of service also allows site personnel to ensure that only complete meals are served. Additional information on point of service counts see *Meal Counts* in Unit 4.

Finding Volunteers

There are many ways of finding volunteers in the community. Here are some examples:

Local Employers

Local businesses are always looking for ways to “give back” to the community and may be interested in sending employees to a site to serve meals over the lunch hour. Employers can “claim” one day each week as their own—for example, the local bank can send staff members to their neighborhood site every Tuesday.

Internship Programs

Sponsors can create a “Summer Meals Internship” opportunity to encourage high school or college students to become involved. Internship opportunities, paid or unpaid, can be a resume builder for students. Giving a young volunteer an “official” title may also boost their commitment level, providing children a reliable mentor they can count on all summer long.

Senior Citizen Programs

Local senior organizations represent an excellent source of committed volunteers. Several senior volunteer organizations exist across the country, including AARP’s *Create the Good*, <https://createthegood.aarp.org/>, and *AmeriCorps Seniors* volunteers, <https://www.nationalservice.gov/programs/senior-corps>. Sponsors interested in working with senior groups may consider hosting an “intergenerational meals” site by coordinating their Program with a senior meals program.

Volunteer Directories

Sponsors can post volunteer opportunities in local volunteer directories, often available in print and online. Sponsors can also share opportunities on national volunteer websites, such as *Volunteer.gov*, <https://www.volunteer.gov/>, *Idealist*, <https://www.idealists.org/en>, or *Volunteer Match*, <https://www.volunteermatch.org/>.

For additional tips, visit the *Summer Meals Toolkit*, <https://www.fns.usda.gov/sfsp/summer-meals-toolkit>.

Sponsor Training Requirements

Training is one of the major administrative responsibilities of a sponsor. A successful, smoothly run Program relies on sponsors providing training on SFSP requirements throughout the period of meal service operation. No site may operate until staff has attended an SFSP operations training session. However, State agencies may waive the training requirement for sponsors that provide Program benefits during unanticipated school closures from October through April or at any time in an area with a continuous school calendar.

Training Required of Sponsor Staff

225.15(d)(1)

Sponsors must annually train all administrative staff and site staff before they undertake their responsibilities. Because these staffing groups have different program responsibilities, sponsors are encouraged to offer separate training sessions to focus on each group's specific functions.

For example, sponsor staff training will include more detailed information regarding administrative oversight, such as verifying meal claims and adjusting the site caps. Site staff training will include detailed information regarding Program operation, such as point-of-service meal counts, proper food storage, and recordkeeping requirements.

Sponsors are encouraged to share information with staff by announcing the date, time, location, and importance of attending any training sessions that have been planned for their specific function. The date, names of attendees, and documentation of the topics covered must be recorded for each training session offered.

Training Topics

7 CFR 225.15(d)(1)(i)

At a minimum, sponsors must be certain that they cover the following topics in the training session for administrative staff and site personnel:

- The purpose of the Program;
- Site eligibility;
- Recordkeeping requirements;
- Site operations, including both congregate and non-congregate meal service;
- Meal pattern requirements; and
- Monitor duties.

Sponsors should provide training throughout the period of Program operations to ensure that staff are thoroughly knowledgeable in all required areas and are able to sufficiently carry out their responsibilities.

The sample *Training Checklists* in Appendix 2 has more suggestions for training topics.

Sponsor Training

7 CFR 225.15(d)(1)(ii)

Training of Administrative Staff:

Training sessions provided to administrative staff must explain the responsibilities and duties of all sponsor personnel administering the SFSP. Personnel may include area supervisors and office staff, such as assistants, clerks, bookkeepers, and secretaries.

Training of Monitors:

A monitor serves as a direct link between the sponsor's administrative office and meal sites. The monitoring function is central to proper Program operations and full reimbursement. Monitors are encouraged to attend both administrative training as well as training at the site level to ensure a comprehensive understanding of Program operations at both levels. It is important that monitors receive thorough training so that they are able to provide meaningful feedback to the sites, among other important responsibilities.

This training may outline the specific duties of monitors including:

- Sites for which they will be responsible;
- Conducting site visits and reviews;
- Monitoring schedules;
- Reporting and recordkeeping procedures;
- Follow-up procedures;

- Office procedures;
- Local sanitation and health laws;
- Civil rights;
- Reporting of race and ethnicity data; and
- Considerations for personal safety, if necessary.

Appendix 2 contains a *Prototype Training Checklist for Monitors*, as well as other sample materials that may be used for training, including site visit and review forms, mileage logs, and a race and ethnicity data form.

Training of Site Staff

7 CFR 225.15(d)(1)

Before any meal service sites may begin Program operations, SFSP regulations require site personnel to annually attend at least one of the sponsor's training sessions. At least one person who has received training must be present at each meal service.

Sponsors must document attendance at site training sessions and schedule additional sessions for those staff who are absent, including any new staff hired during current Program operations. Sponsors are responsible for ensuring that new site staff receive all necessary training before beginning meal service duties.

Sponsors may provide virtual training, including online or by video conference or webinars. The use of virtual training technologies allows sponsors to offer training more frequently and increases access to training, especially for staff at sites that operate non-congregate meal service.

Sponsors may also provide training to local health inspectors and vendors. A notice of the site training session may be sent to local health inspectors to give them the opportunity to become more familiar with SFSP meal service operations. Sponsors may invite FSMC or SFA representatives to train on menus and delivery schedules.

Training of Food Service Staff

All food service staff must be trained on:

- The goals of the SFSP;
- The meal pattern requirements;
- The importance of preparing nutritious meals that meet meal pattern requirements; and
- The local health, safety, and sanitation standards.

As a best practice, site supervisors should ensure that food service staff have a good understanding of the operation of food service equipment and are able to develop and follow standardized recipes that meet meal pattern requirements. For standardized recipe ideas, visit *Team Nutrition Recipes*, <https://www.fns.usda.gov/tn/team-nutrition-recipes>.

Sponsors may contact their State agency for training materials promoting nutrition education, food safety information, recipes, and more. Video packages are available for group training or self-study. Sponsors can also visit the *Institute of Child Nutrition* website, <https://theicn.org/>, for many more resources.

To ensure compliance with regulations and increase Program integrity, it is a best practice to hold consistent training refreshers for site staff throughout the period of operation. Frequent video calls, texts, e-mails, and other virtual methods of communication with site staff provide opportunities for the sponsor to build relationships and answer questions that may arise before a problem occurs.

For example, meetings and telephone contacts with site and monitoring staff will provide opportunities to ask questions, discuss site operations, and provide specific training on any problem area. In addition, discussions of job descriptions and explanations about the organizational structure enable staff members to understand their own responsibilities as well as those of their coworkers.

Pre-operational Requirements

Sponsor and Site Agreement

Sponsors that intend to operate any site that is legally unaffiliated with their organization should enter into an agreement with the site supervisor or responsible site official. The agreement should list the specific responsibilities of the site supervisor, which will make it easier for the site personnel to understand their duties.

The agreement does not relieve the sponsor of administrative and financial responsibility for operating the SFSP at the site, including its responsibility to maintain contact with meal service staff, ensure that there is adequately trained meal service staff on site, and monitor site operations. A sample *Sponsor and Site Agreement Form* can be found in Appendix 2.

Health and Sanitation

7 CFR 225.6(i)(9) and 225.16(a)

When sponsors choose their prospective sites, they must notify the local health department in writing of their intention to provide meal services at specific times and site locations. Before Program operations begin, the sponsor must submit to the State agency a copy of this notification.

Sponsors must conform with all applicable State and local laws and regulations to maintain proper sanitation and health standards at their sites. Although some sites, such as sites that do not prepare food on site, may be exempt if the administering agency that enforces State and local health and safety requirements issues a written exemption. The SFSP State agency cannot issue an exemption.

Even if an exemption is issued, there must be some level of health and safety standards in place to ensure that adequate facilities are available to prepare and store meals. For more information, see SFSP 07-2015, *Health and Safety Inspection Requirements*, December 10, 2014, <https://www.fns.usda.gov/health-and-safety-inspection-requirements>. The *Summer Meals Toolkit*, <https://www.fns.usda.gov/sfsp/summer-meals-toolkit>, also provides health inspection tips.

Planning for Extreme Weather Conditions

7 CFR 225.6(g)(1)(viii)

Concerns for the physical health and safety of children and consideration of extreme weather conditions must be addressed by the State agency when a site is approved. State agencies must ensure that sponsors have made appropriate arrangements for food service during periods of inclement weather. Although all outdoor SFSP sites are not required to have an alternate temperature-controlled site, sponsors should have a contingency plan for dealing with thunderstorms, excessive heat, and other types of extreme weather conditions. For example, the sponsor's contingency plan may require the site to discontinue the meal

service, if safety is a concern; use a tent to provide extra shade on extremely hot days; or partner with a housing community to use an air-conditioned lobby or community room on extremely hot days.

Responding to Disasters

Sponsors are also encouraged to plan in advance to ensure a rapid response when an emergency situation arises. For example, a sponsor may work with the State agency to obtain approval to operate during unanticipated school closures. The State agency may pre-approve sponsors to operate emergency meal sites in response to a disaster at any time of the year during the initial application process. For more guidance, see SFSP 18-2014, Disaster Response, May 19, 2014, <https://www.fns.usda.gov/cn/disaster-response>.

State agencies and sponsors, through their State agency, may request individual waivers under the authority of section 12(l) of the NSLA to implement Program flexibilities when experiencing disasters or other emergency situations. For more information on the waiver request process, see SFSP 05-2018, Child Nutrition Program Waiver Request Guidance and Protocol - Revised, May 24, 2018, <https://www.fns.usda.gov/cn/waiver-request-guidance-and-protocol-revised>.

Sponsor Monitoring Requirements

7 CFR 225.14(c)(4) and (6) and 225.15(d)

Monitoring is essential to making a Program successful. Having knowledgeable trained monitors will best ensure compliance with Program requirements. Establishing a proper monitoring system will help prevent problems from occurring and will make it easier to correct any problems that arise during the summer. The size of the monitoring staff will, depend on the size of the sponsor's Program. Staff Selection is described earlier.

The sponsor must ensure that the monitor's responsibilities and authority are clear to the monitoring staff, site supervisors, and office personnel. This section will go into detail about the visits and reviews that monitors are required to perform in order to ensure that sites comply with Program guidelines. As a best practice, monitors may want to consider:

- Carrying a supply of all necessary review forms during site visits and reviews;

- Providing training for site personnel when needed; and
- Spending enough time at each site to ensure proper Program operations.

Visits and Reviews

Monitors are required to perform site visits and meal service reviews for all sites including non-congregate and congregate meal services. These are conducted on-site and include pre-operational site visits, initial site visits and full meal service reviews. Visits and reviews are further discussed in the *SFSP Sponsor Monitor's Guide*, <https://www.fns.usda.gov/sfsp/sponsor-monitors-guide>, which provides more detailed information on sponsor monitoring requirements and sample forms.

Site visits require monitors to ensure that the meal service is operating smoothly and that any apparent problems are immediately resolved. Meal service reviews require monitors to observe a complete meal service from beginning to end, including delivery or preparation of meals, the meal service, and clean up after meals, in order to determine if the site is meeting all the various Program requirements. These visits and reviews are an important part of the sponsor's responsibility to ensure the integrity of the Program.

Visits and reviews are conducted on-site, however there are some exceptions where off-site flexibilities are available. For more guidance, see SFSP 06-2023, *Oversight and Monitoring of the Summer Food Service Program – Guidance on On-site and Off-site Strategies and Options*, April 6, 2023, <https://www.fns.usda.gov/cn/oversight-monitoring-onsite-offsite-sfsp-guidance>. For additional information on sponsor monitoring requirements and sample forms, refer to the *SFSP Sponsor Monitor's Guide*, <https://www.fns.usda.gov/sfsp/sponsor-monitors-guide>.

Sponsors must ensure that the following minimum monitoring requirements are met:

Pre-operational Visits

7 CFR 225.15(d)(2)

Pre-operational visits are required to be conducted by the sponsor to determine that the sites have been visited and have the capability and facilities to provide the meal service planned for the anticipated number of children in attendance, and the capability to conduct the proposed meal service. Prior to submitting a

request for approval to the State agency, sponsors are required to conduct pre-operational visits for the following types of sites:

- New sites;
- Sites that experienced operational problems in the previous year; and
- Existing sites that are new to non-congregate meal service.

As part of the application to participate in SFSP, sponsors must certify that all required pre-operational site visits have been conducted for the sites proposed and that the sites have facilities to provide the meal service planned for the number of children anticipated to be served and the capability to conduct proposed meal service. Sponsors should record the date of the pre-operational visit to each site and the name of the person who visited each site. If a sponsor does not include this certification in their application, they are not considered an eligible applicant. Pre-operational site visits must not be confused with the required initial site visits and full meal service review, which is further explained in the section below.

For a ready-to-adapt monitoring form template, see the *SFSP Sponsor Monitor's Guide*, <https://www.fns.usda.gov/sfsp/sponsor-monitors-guide>, for a sample form that can be used to record pre-operational visit information. Sponsor monitors should record the date of the pre-operational visit to each site and the name of the person who visited each site.

Initial Site Visits

7 CFR 225.15(d)(3)

Sponsors must conduct visits of the following sites at least once during the first 2 weeks of operation:

- All new sites;
- All existing sites that are new to providing non-congregate meal service;
- All sites that have been determined by the sponsor to need a visit based on criteria established by the State agency for sites with operational problems in the prior year; and
- Any other site that the State agency has determined needs a visit.

These visits are to ensure food service operations are running smoothly and to verify information such as the site address, storage, holding and preparation facilities, and serving capabilities. If a site operates for 7

calendar days, or fewer, the initial site visit must be completed during the period of operation. If a site visit reveals a problem, sponsors must take prompt action to correct any deficiencies they find. Check with your State agency for additional guidance.

Meal Service Reviews

7 CFR 225.15(d)(4)

Sponsors must conduct a full review of food service operations at each site at least once during the first 4 weeks of Program operations using the monitoring form developed by the State agency. If a site operates less than 4 weeks, the sponsor must still conduct a full meal service review during the period of operation. Sponsors may conduct the full review of food service operations at the same time they are conducting an initial site visit, outlined above.

Monitors must observe the entire duration of meal service. Additionally, monitors must review food delivery or meal preparation, meal counts, and review daily records maintained by the site supervisor.

Sponsors must maintain a reasonable level of site monitoring to ensure continued Program compliance. However, to ease administrative burden, sponsors may use the flexibility described in SFSP 10-2023, *Initial Site Visits in the Summer Food Service Program*, May 30, 2023, <https://www.fns.usda.gov/sfsp/initial-site-visits>, to conduct the initial site visit and full meal service review at the same time.

Monitoring Reports

Each State agency must develop and provide monitoring report forms to all approved sponsors that contain all of the required elements specified at 7 CFR 225.7(j), including whether the meal service is congregate or non-congregate.

All visits and reviews must be documented on a monitoring report form. Records of visits and reviews will help sponsors assess the operation of sites. Records are only useful, however, when they are carefully reviewed by sponsor personnel and when follow-up monitoring is scheduled to ensure that any corrective actions have been taken to improve site operations.

As a best practice, sponsors should utilize a tracking system for handling monitor reports. Sponsors should have a system that will ensure that monitors return reports frequently—every day, if possible.

The reports should be immediately reviewed by the assistant director or another assigned member of the sponsor's staff who is responsible for following up on any problems. The staff member should:

- Review any problems found by the monitor.
- Call the site supervisor, if necessary.
- Document corrective action taken at the site.
- Schedule a follow-up review, if necessary, based on the severity of the problem.
- Sign and date the report.

Sponsors must be sure that monitors schedule visits and reviews so that they can meet the Program requirements. A good monitoring schedule and an efficient system for review and follow-up of the monitoring reports are necessary for effective Program operations. The sponsor review official should base the timing of a follow-up review according to any problems encountered, and the severity of such problems.

When the sponsors review monitoring reports, they should pay attention to the quality of the reports. There are several indicators that may suggest the monitor's lack of Program knowledge or the monitor's misunderstanding of responsibilities. Additional training would be appropriate if the monitor:

- Did not answer all questions on the report left or a response to a question incomplete.
- Rarely noted problems and did not include comments in the remarks section of the report.
- Observed that the number of meals delivered or served and the number of children who were in attendance were always the same, with no follow-up to see if meal counts were appropriately taken.
- Recommended a corrective action without noting the action taken or initiating correction of the problem.
- Did not recommend adjustments in orders when the number of meals exceeded attendance.
- Arrived late at a site or did not stay to observe the entire meal service period.

Sponsors must maintain all records for 3 years after the end of the fiscal year of operation, or longer if required by the State agency. These records must be accessible to Federal and State agency personnel for audit and review purposes. For more information, see *Recordkeeping Requirements* in this unit.

Non-contractible Management Responsibilities

7 CFR 225.15 (a)(3)

Sponsors have financial and administrative responsibility for total Program operations at all sites. Sponsors cannot contract out management responsibilities of the Program, including but not limited to the following tasks:

- Meal ordering;
- Official recordkeeping responsibilities, including meal count information to substantiate claims;
- Submission of claims for reimbursement;
- Training of administrative and site staff;
- Monitoring of sites;
- Announcement of the availability of meals to the news media;
- Determination of children's eligibility for free meals; and
- Maintaining of individual free meal applications.

Sponsors should check with the State agency before allowing an FSMC to undertake any task related to these responsibilities of any other tasks that may be considered management functions.

FNS Instruction 796-4, Rev. 4, *Financial Management– Summer Food Service Program for Children*, April 14, 1994, <https://www.fns.usda.gov/sfsp/financial-management-summer-food-service-program-children>, provides information on establishing standards, principles, and guidelines in the development and maintenance of financial management systems. State agencies can provide an overview of the information included in the instruction to their sponsors.

Program Violations

7 CFR 225.11

Violations of Program requirements may result in withholding or recovery of reimbursements, corrective action, or termination and exclusion from future Program participation. The sponsor is required to take corrective action whenever the State agency observes violations during the course of a site review.

Corrective Action Plan

7 CFR 225.11(c) and (f)

If a high level of meal service violations at a site, the State agency will immediately require the sponsor to follow a specific corrective action plan. The State agency will initiate a follow-up system to ensure that sponsors take the specific action, as outlined in the plan, for correcting site violations.

Program violations include, but are not limited to:

- Failure to maintain adequate site or sponsor records.
- Failure to adjust meal orders to conform to changes in site attendance.
- Failure to have a trained site supervisor at each site during the meal service. (For all sites, except for non-congregate meal service sites conducting home delivery, the site supervisor must be on site for the duration of the food service.)
- Noncompliance with the meal service time restrictions, as described in 7 CFR 225.16(c).
- Service of more than one meal to a child at one time at congregate meal sites.
- Children eating complete meals off-site at congregate meal sites. (This does not refer to the permissible practice of allowing children to take a fruit, vegetable, or grain component off-site.)
- Distribution of more than the daily meal limit when multi-day service is used at non-congregate meal sites.
- Claiming meals that were not served to eligible children.
- Serving or offering meals that do not include all required meal components or correct quantities.
- Failure to report sites to the health department.
- Continued use of FSMCs or commercial meal vendors that have violated health codes.
- Submission of false information to the State agency.
- Use of Program funds for unallowable costs.
- Failure to return excess start-up or advance payments to the State agency.
- Failure to adhere to competitive bid procedures.
- Noncompliance with civil rights laws and regulations.
- Failure to count meals at the point of service.
- Errors in meal count consolidation.

- Failure to meet training on monitoring requirements.
- Failure to gain parental consent for non-congregate meals distributed through home delivery.

Program Finances

Sponsors receive Program payments based on the number of meals served multiplied by the appropriate combined administrative and operating rates for reimbursement. When sponsors apply to participate in SFSP, they may request advance payments for their total Program costs, for their operating costs, or for their administrative costs. The sponsor must have a signed agreement with the State agency to be eligible to receive any SFSP payments.

Advance Payments

7 CFR 225.2 and 225.9 (a) and(c)

Sponsors may request advance payments to help them meet Program expenses, prior to receiving reimbursements. These payments are advances on the reimbursement that sponsors will receive for a month of operations. The advances help sponsors maintain a positive cash flow by making funds available to meet Program costs as they arise throughout the month. The amount of the advance payment is deducted from future reimbursement payments.

Sponsors must request each advance payment from the State agency at least 30 days before the payment dates of June 1, July 15, and August 15. To be eligible for second or third payments, sponsors must certify that they are operating the number of sites which the State agency approved in the sponsor's budget. Sponsors must also certify that their projected costs do not differ significantly from the approved budget.

Except for SFAs, sponsors must conduct training sessions before receiving the second advance payment. The sponsor must certify that it has held training sessions on Program requirements for site and sponsor personnel, before the State agency may release the second month's advance payment. Additionally, a sponsor may not receive an advance in any month when it will operate for less than 10 days. If a sponsor operates for less than 10 days in June, but for at least 10 days in August, the second advance payment must be made by August 15.

The State agency must make the best possible estimate based on the sponsor's request and any other available data. Advance payment amounts may not exceed the amount estimated by the State agency to be needed by the sponsor to meet Program costs. The State agency should use the method to determine the amount of advance payments that results in a larger payment:

- If sponsors participated in the previous year's Program, the advance payments for costs usually will be based on the total reimbursement they earned during the same month of the previous year.
- The State agency also may estimate advance payments as a percentage of anticipated costs.
 - For vended sponsors, 50 percent of the amount the State agency determines the sponsor will need for that month's meals.
 - For self-prep sponsors, 65 percent of the amount the State agency determines the sponsor will need for that month's meals.

Repayment of Excess Funds

7 CFR 225.2 and 225.9(c)(6)

Excess funds are the difference between any advance funding and meal reimbursements, when advance funds received by a sponsor are greater than the reimbursement amount earned by a sponsor.

It is the sponsor's responsibility to return any excess advance payments upon demand of the State agency. The sponsor must repay the amount that is cited on the valid claim for reimbursement.

Failure to return excess funds may lead to a termination of the sponsor's agreement and a determination of serious deficiency.

Start-up Payments

7 CFR 225.2 and 225.9(a)

The State agency may, at its discretion, provide the sponsor with a limited amount of start-up payments. The sponsor may receive up to 20 percent of the sponsor's approved administrative budget for costs incurred to plan the meal service or establish effective management procedures for the meal service.

These start-up payments are deducted from the first advance payment, if the sponsor receives them, or the first reimbursement payment,

Sponsors may request start-up payments, if they are available, when they apply to participate in the Program. If approved, the start-up payments may not be provided any earlier than two months before food operations begin. For more information, see SFSP 7-2014, *Expanding Awareness and Access to Summer Meals*, November 12, 2013, <https://www.fns.usda.gov/cn/expanding-awareness-and-access-summer-meals>.

Program Reimbursements

7 CFR 225.9(d)

Program Reimbursement amounts are determined using a “meals times rates” formula, meaning they are calculated by taking the number of meals served and multiplying it by the per meal reimbursement rate. The product of this formula equals the total amount of reimbursement to be paid.

Sponsors are not eligible for reimbursement unless they have signed an agreement with the State agency. Sponsors must maintain complete records to document all costs and meals they claim for reimbursement. For additional information on recordkeeping, see *Recordkeeping Requirements* in this unit. Examples of recordkeeping forms are found in Appendix 2.

Allowable Costs

7 CFR 225.2 and FNS Instruction 796-4, Rev. 4

Reimbursements may be used to cover operating costs which are reasonable, necessary, and allocable.

Allowable operating costs may include, but are not limited to:

- Compensation of Program labor;
- Food and non-food supplies;
- Facilities service costs;
- Utility costs;
- Costs for transporting children to a meal service site; and
- Costs for transporting food to a meal service site.

Sponsors must consider the factors listed under 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Subpart E - Cost Principles, to determine and ensure that costs are allowable.

Allowable administrative costs are costs incurred by the sponsor for planning, organizing, and managing the meal service, excluding interest and operating costs.

Administrative costs may include allowable direct and indirect costs. If the sponsor has an approved indirect cost rate, the rate must be applied to the base which is common to the functions benefiting from the indirect costs. For example, if the approved base is direct salaries, then only those salaries of individuals that can be specifically identified with SFSP activities can be used as the base in the calculation of the indirect costs.

For additional guidance on indirect costs, see:

- SP 60-2016, *Indirect Cost Guidance*, September 30, 2016, <https://www.fns.usda.gov/cn/indirect-cost-guidance>.
- SFSP 11-2015, *Assessing Costs in the Summer Food Service Program*, February 25, 2015, <https://www.fns.usda.gov/sfsp/assessing-costs-summer-food-service-program>.
- SFSP 05-2017, *Summer Food Service Program Question and Answers – Revised*, December 1, 2023, <https://www.fns.usda.gov/sfsp/program-qas>.

Unallowable Costs

FNS Instruction 796-4, Rev. 4

Unallowable costs are costs for which Program funds may not be used. They include, but are not limited to:

- Costs for excess meals that are ordered or prepared but not served to eligible children, unless specifically approved by the State agency.
- Meals served in violation of Program requirements.
- Rental costs for periods beyond the close-out date for Program operation.
- The cost to purchase food, such as coffee, for use outside of the SFSP.

- The cost of meals served to administrative adult personnel or any other adults who are not engaged in the operation of the meal service.
- Cost of spoiled or damaged meals.
- The cost of meals delivered by an FSMC to a non-approved vended site delivered outside of the agreed upon delivery time, or served in excess of the approved site cap. SFSP 16-2015, *Site Caps in the Summer Food Program; Revised*, April 21, 2015, <https://www.fns.usda.gov/sfsp/site-caps-summer-food-service-program-revised>.
- Bad debts, which are any losses arising from non-collectible accounts and other claims and related costs.
- Repayment of overclaims and other Federal debts.
- Costs of contributions and donations made by the sponsor to other entities.
- Fines or penalties resulting from violations of or failure to comply with Federal, State, or local laws and regulations.
- Entertainment and fundraising costs.
- Interest on loans, bond discounts, costs of financing and refinancing operations, and legal and professional fees paid.
- Costs resulting from an under-recovery of costs under other grant agreements.
- Direct capital expenditures or option to purchase rental costs for acquisition of land or any interest in land, acquisition or construction of buildings or facilities, alteration of existing buildings or facilities, non-expendable equipment of any kind, repairs that materially increase the value or useful life of buildings or facilities or non-expendable equipment; and other capital assets, including vehicles.
- Any other costs incurred that Program officials determine to be in violation of applicable laws or regulations.

Other Sources of Program Income

7 CFR 225.9(g)

Funds accruing to the food service account include all funds received from Federal, State, local, and other sources except Program advances, start-up funds, and reimbursement payments received from the State agency.

Funding sources that are considered Program income include cash donations specifically identified for use in the Program and any Federal, State, or local funds specifically provided to the Program. These funds must be designated specifically for the SFSP. Records reflecting income may include deposit records, voucher stubs, and receipts.

Any reimbursements or funds that exceed or are greater than a sponsor's expenditures must be used in a way that benefits SFSP services to children or other Child Nutrition Programs operated by the sponsor. Sponsors with funds remaining at the end of the Program year should use them as start-up funds or for improving SFSP services in the following year.

Excess funds and unused reimbursement cannot be transferred to operations that are not related to the Child Nutrition Programs. Sponsors cannot use excess funds or unused reimbursement to increase salary or fringe benefit costs when the sole purpose of the increase is to reduce the food service program balance. If the sponsor will not be participating in SFSP the next year, funds may be used towards the sponsor's provision of other Child Nutrition Programs. If the sponsor does not operate any other Child Nutrition Programs, the State agency will collect the excess funds. The sponsor may retain unused reimbursements. The sponsor is not required to return the unused reimbursement to the State agency.

Claims for Reimbursement

7 CFR 225.9(d) and 225.15(c)(1)

Program payments are based on the number of reimbursable meals served to eligible children multiplied by the current SFSP reimbursement rate for each meal type. Sponsors must be eligible to receive additional reimbursement for each meal served to participating children at rural or self-prep sites. See SFSP 05-2023, *Best Practices for Meal Claim Verification and Ensuring Properly Payable Claims in the Summer Food Service Program*, April 03, 2023, <https://www.fns.usda.gov/sfsp/best-practices-meal-claim-verification-payable-claims>.

Sponsors assume complete responsibility for all the information they submit on their claims. Claims for reimbursement must reflect only meals that meet SFSP requirements, as described in 7 CFR 225.16, and are actually served to eligible children during the claiming period. For more information, see *Meal Service Requirements* in Unit 4.

Based on records that are regularly submitted by the sites, sponsors must report the number and type of first and second meals served to all children; sponsors of camps, closed enrolled sites, or conditional non-congregate sites need to report the meals served to eligible children only. For sample *Meal Count Forms*, see Appendix 2.

The total number of second meals claimed, which is only allowable at congregate meal sites, cannot exceed two percent of the number of first meals, for each type of meal served during the claiming period. State agencies can provide further guidance on serving second meals and on those situations where second meals will not be reimbursed.

Sponsors must maintain records of all operating and administrative costs, as well as any Program income received. For additional information see *Recordkeeping Requirements* in this unit.

After the reimbursement claim form is completed, a sponsor must sign the form and send it to the State agency as soon as possible. Claims for reimbursement should be submitted within the month following the month covered by the claim. Claims will not be paid if they are submitted more than 60 days after the last day of the month covered by the claim unless an exception is granted by FNS. The State agency may impose a shorter deadline for submission of the claim within the 60-day requirement.

Revised claims that reflect a change in reimbursement amount must be submitted within 60 days, unless the revision is a downward adjustment. All claims submitted after 60 days that would generate an upward adjustment in reimbursement must follow the late claim policy, which allows the State agency to grant an exception once every 36 months. SFSP 07-2018, *60 Day Claim Submission and 90 Day Reporting Requirements for Child Nutrition Programs*, September 14, 2018, <https://www.fns.usda.gov/cn/60-day-claim-submission-and-90-day-reporting-requirements> provides clarification and guidance on claims submission and reporting.

While State agencies may establish additional Program requirements with FNSRO approval, State agencies may not disallow meals that are otherwise reimbursable only because the sponsor violated an additional State agency requirement. SFSP 06- 2013 - REVISED, *Additional State Agency Requirements in the Summer Food Service Program*, January 24, 2013, <https://www.fns.usda.gov/sfsp/additional-state-agency-requirements-summer-food-service-program>.

State agencies and sponsors are encouraged to establish internet or electronic-based systems of records and claiming to streamline recordkeeping and reporting. Any electronic system must include a means to fully access Program benefits without internet or computer access and must not create a barrier to participation. In cases where participating institutions are unable or unwilling to implement electronic based systems, it may not be reasonable to expect that a State agency will be able to provide the same level of service that users of electronic systems receive. Regardless, States must still meet all regulatory requirements. SFSP 07-2007, *Electronic Record and Reporting Systems*, June 15, 2007, <https://www.fns.usda.gov/cn/electronic-record-and-reporting-systems-1>.

Consolidation of Claims for Reimbursement

7 CFR 225.9(d)(3)

With approval from the State agency, sponsors have the flexibility to combine the monthly claims for reimbursement. The combined claim must be submitted within 60 days of the last day of operation. Sponsors may not submit a combined claim for meal reimbursements that crosses fiscal years. State agencies must ensure that the correct reimbursement rates are applied for meals claimed for months when different reimbursement rates are in effect. A sponsor may combine the claim for reimbursement in the following ways:

- For 10 operating days or less in their initial month of operations with the claim for the subsequent month;
- For 10 operating days or less in their final month of operations with the claim for the preceding month; or
- For 3 consecutive months, as long as this combined claim only includes 10 operating days or less from each of the first and last months of program operations. The 3 consecutive months must not cross federal fiscal years or contain months where the reimbursement rates are different.

Non-Reimbursable Meals

Sponsors may claim reimbursement only for those meals that meet SFSP requirements. Reimbursement may not be claimed for:

- Meals that are not served as a complete unit, except at “OVS” sites where complete meals must be offered.
- Meal patterns or meal types that are not approved by State agencies.
- Meals served at sites that are not approved by State agencies.
- Providing more than the maximum number of reimbursable meals to a child at a non-congregate site, i.e., exceeding the number of meals that could be provided over the calendar day period approved by the State agency.
- Second meals in excess of 2 percent of the number of first meals served by type during the claiming period at congregate sites.
- Any second meals served as part of a non-congregate meal service.
- Any meals at a non-congregate site served to adults other than a child’s parents or guardians.
- Meals served outside of approved meal service times or approved dates of operation, unless the State agency determines that there was an unanticipated event, outside of the sponsor’s control.
- Breakfast meals served after a lunch meal has been served at congregate sites.
- Meals claimed for ineligible children in camps.
- Meals claimed at camps and at conditional non-congregate sites for children who do not meet the income eligibility guidelines for free or reduced price meals.
- Meals delivered to a child’s home without parental consent.
- Meals delivered to the home of a child who does not meet the income eligibility guidelines for free or reduced price meals.
- Meals that are spoiled or damaged.
- Meals served to children at any vended site in excess of the approved level of meals (site cap).
- Meals missing one or more required components or meals that have an inadequate quantity of one or more required components.
- Bulk meals that do comply with the requirements at 7 CFR 225.16(i)(3).
- Meals served to adults that are included in the meal count, except for meals that are picked up by parents or guardians at approved non-congregate sites.
- Meals that were not served.
- Meals served to anyone other than eligible children, except for meals that are picked up by parents or guardians at approved non-congregate sites.

Excess Funds Versus Unused Reimbursements

7 CFR 225.9(g)(1)

To protect the integrity of Program operations, current regulations distinguish between excess funds and unused reimbursement to ensure that sponsors are only permitted to retain funds that are earned for SFSP meals served to children.

Excess Funds

The accrual of excess funds occurs when advance payments received by a sponsor are greater than the reimbursement amount earned by a sponsor.

For example, if a sponsor requested \$1,000 in advance payments and only claimed \$900 in meal reimbursement, the sponsor would have \$100 in excess funds, which cannot be applied to other Child Nutrition Programs. The State agency must recover the \$100 in excess funds at the end of Program operations for which the advance was paid.

Unused Reimbursement

Unused reimbursement is the difference when the amount of reimbursement earned exceeds allowable costs.

For example, if a sponsor received \$1,000 in meal reimbursement but only spent \$900 on actual costs to operate the Program, the sponsor would have \$100 in unused reimbursement, which is not subject to recovery.

All unused reimbursement remaining at the end of the Program year must be kept in a non-profit food service account and used to pay allowable SFSP costs, such as start-up costs for the following year, or allowable costs of other Child Nutrition Programs operated by the sponsor. Sponsors must use the unused reimbursement to improve the meal service or Program management. For example, the sponsor may:

- Improve the quality of food provided.

- Upgrade meal service sites or food preparation facilities, like cooking utensils, temperature control containers, or picnic tables.
- Enhance monitoring, training, and other oversight activities.
- Apply the unused reimbursement as start-up funds or advance payments for the following year.

For more guidance, see:

- SFSP 13-2023, *Unused Reimbursement in the Summer Food Service Program*, September 28, 2023, <https://www.fns.usda.gov/sfsp/unused-reimbursement>.
- SFSP 14-2023, *Best Practices for Managing Unused Reimbursement in the Summer Food Service Program*, September 28, 2023, <https://www.fns.usda.gov/sfsp/best-practices-managing-unused-reimbursement>.

Recordkeeping Requirements

Sponsors must keep full and accurate records to justify claims for reimbursement, demonstrate that SFSP funds are used only for allowable Program costs, and confirm that the sponsor is in good standing.

Maintaining Records of Costs and Tracking Funds

7 CFR 225.15(a)(4) and 225.15(c)

Records must be maintained that document the amount and purpose of all administrative costs attributed to SFSP. Sponsors must maintain documentation of a non-profit food service including copies of revenues received and expenses paid from the non-profit food service account. Sponsors must be able to account for the receipt, obligation, and expenditure of all SFSP funds and ensure that all Program reimbursements are used solely for conducting a non-profit food service operation.

However, this does not mean that sponsors are necessarily required to maintain SFSP funds in a separate bank account from other expenditures. Sponsors may use one non-profit food service account for any Child Nutrition Program authorized under NSLA, except WIC.

When a sponsor's total food service is not conducted solely for the benefit of its own SFSP participants, the non-Program and Program components of the food service operation must be tracked separately. Through this separation, the sponsor must ensure that the SFSP non-profit food service Program component does not support any non-Program food service activities, such as vending or catering operations or adult meal services. For a sample *Summary of Administrative Expenses Form*, see Appendix 2.

Retention of Records

7 CFR 225.6(i)(14)

Sponsors must maintain all records for 3 years after the end of the fiscal year of operation, or longer if required by the State agency. These records must be accessible to Federal and State agency personnel for audit and review purposes. The records can only be disposed of after 3 years if there are no unresolved audit findings or the Program is not under investigation.

Administrative Records

Meal Count Records

7 CFR 225.15(c)

All sponsors must use daily site records to document the number of Program meals they have served to children. The sponsor must provide all necessary record sheets to the sites. Site supervisors are then responsible for keeping the records each day.

A designated member of the site staff must verify the adequacy and number of meals delivered by checking the meals when they are delivered to the site. Vended sites must support this information with signed delivery receipts. Sites that use a central kitchen should support this information with signed delivery receipts, for good Program management.

The site personnel must complete the records based on actual counts taken at each site for each meal service on each day of operation. They must be sure that they record all required counts. These counts should include the number of:

- Meals delivered or prepared, by type—breakfast, snack, lunch, supper;
- First meals served to children, by type;
- Second meals served to children at congregate sites, by type;
- Excess meals or meals leftover;
- Non-reimbursable meals;
- Meals served to Program adults, if any; and
- Meals served to non-Program adults, if any.

Sponsors should collect these site records at least every week. They may have their monitors pick up site reports on designated days, or the site supervisors may be asked to mail the records to the sponsor’s office. Sponsors may also scan, text pictures use Google forms, or other technologies to receive the records from the site. Many sponsors also utilize programs for tracking meal counts in real time.

When they collect the site records, sponsors should check for the site supervisor’s signature. Any sponsor serving vended meals must be sure that the figure entered as the number of meals delivered on the site record is the same as that entered on the vendor’s report. If there is any discrepancy between the numbers, the sponsor should immediately contact the vendor and the site supervisor to resolve the problem. The sponsor should make a permanent note of the discrepancy as well as the action that was taken to resolve it.

Training Records

7 CFR 225.9(c)(1) and 225.15(d)(1)

Sponsors must keep records that document:

- Dates of training for site and administrative personnel;
- Participation at each training session, including signed attendance form or record of virtual attendees; and
- Topics covered at each training session, including required topics. For more information see *Sponsor Training Requirements* in this unit.
- Except for SFAs, certification that the sponsor requesting advance payments has completed training for site and administrative personnel.

Site Visit and Full Meal Service Review Records

7 CFR 225.14(c)(6) and 225.15(d)(2), (3) and (4)

Sponsors must be able to document that they have complied with monitoring requirements. Monitors must submit the following reports:

- Pre-operational site visits for new sites, sites that experienced operational problems the previous year, and existing sites that are new to non-congregate meal service;
- Initial site visits, conducted at least once during the first 2 weeks of Program operations; and
- Additional site visits conducted throughout the period of Program operation.

Full meal service reviews are conducted on site. Monitors must be present for the full duration of the approved meal service and document their arrival and departure times. They must keep records of all site visits and meal service reviews, whether the sites are operating a congregate or non-congregate meal service.

Monitors must submit a completed review form for each site review conducted during the first 4 weeks of Program operations and for site reviews throughout the duration of the Program. Sponsors may conduct a full review of food service operations at the same time they are conducting a site visit.

The review form contains much of the same information as the site visit form with additional information on meal preparation and delivery schedules, the quality and accuracy of site records and recordkeeping, the regular adjustment of meal orders, and menu changes. The *SFSP Sponsor Monitor's Guide*, <https://www.fns.usda.gov/sfsp/sponsor-monitors-guide>, has sample site visit and site review forms.

Operating Cost Records

7 CFR 225.2 and FNS Instruction 796-4, Rev. 4

Operating costs are allowable costs incurred by the sponsor for preparing and serving meals to eligible children and Program adults. These costs include, but are not limited to the cost of food used in the Program, labor, non-food supplies, and space for the meal service. Sponsors of rural sites may incur

operating costs for transporting children from rural homes to rural meal service sites or delivering non-congregate meals to rural areas. All costs must be documented actual Program costs.

Food Costs for On Site Preparation

FNS Instruction 796-4, Rev. 4

The data that is necessary for computing the cost of food used is more extensive when sponsors prepare meals on-site or at a central kitchen.

Food costs cover the purchase cost and the sponsor's cost to process, transport, store, and handle food that is purchased or donated, including USDA Foods. Sponsors cannot charge the Program for major reductions of food in stock that are the result of fire, theft, spoilage, contamination, or any event other than normal usage.

Records to support the cost of food used should include, at a minimum:

- Receiving reports that record the amount of food received from the supplier;
- Purchasing invoices;
- Records of any returns, discounts, or other credits not reflected on purchase invoices; and
- Cancelled checks or other forms of receipt for payment.

Food Costs for Vended Programs

FNS Instruction 796-4, Rev. 4

The cost of food used means the allowable cost of the preparation or the allowable cost of preparation and delivery of meals charged to the sponsor by the FSMC or the SFA. Sponsors should not pay charges for meals delivered to non-approved sites, meals delivered outside of the established delivery time, meals that are spoiled or do not meet meal pattern requirements, or meals that do not meet the requirements or terms of the contract.

The sponsor must maintain records that include signed delivery slips to support the claim for reimbursement. The delivery slip is the sponsor's documentation that the meal served matched the menu for that day, unless a substitution has been indicated.

The delivery slip must provide sufficient detail to document compliance with SFSP requirements. It is strongly encouraged that, at a minimum, the delivery slip specify the type of meals delivered, the number of meals delivered, and the date and time of delivery. The Site Supervisor or designated site personnel should:

- Determine what meals are being signed for on the delivery slip;
- Check the quantity;
- Check the temperature of the meals, if applicable;
- Ensure that meals meet the meal pattern requirements;
- Note any errors on the delivery slip; and
- Maintain the signed detailed delivery slip to support the sponsor's claim for reimbursement.

Administrative Costs

7 CFR 225.2 and FNS Instruction 796-4, Rev 4

Administrative costs are costs incurred by the sponsor for activities related to planning, organizing, and administering the Program, excluding interest costs and operating costs. Generally, administrative activities include the sponsor's actions to:

- Prepare and submit a sponsor application for participation, including a management plan containing budgets of operating and administrative costs, and staffing and monitoring plans;
- Establish site eligibility through the collection of:
 - School or census tract data for open or restricted open sites;
 - School or census tract data or family household applications for closed enrolled sites to determine if 50 percent or more of the children are eligible; and
 - Family household applications to determine the children who are eligible for free meals at camps and conditional non-congregate sites.
- Attend training provided by the State agency;
- Hire and train site and administrative personnel;
- Visit sites, review and monitor Program operations at sites, and document the visits and reviews;
- Prepare and submit a plan and summary of the invitation to bid if the sponsor intends to contract with an FSMC;
- Prepare and submit claims for reimbursement; and

- Perform other activities that are necessary for planning, organizing, and managing the Program.

Generally, costs incurred for these activities are:

- Labor costs for administrative activities;
- Rental costs for offices, office equipment, and vehicles;
- Vehicle allowance and parking expenses;
- Office supplies;
- Communications;
- Insurance and indemnification, i.e., compensation for harm or loss;
- Audits; and
- Travel.

Labor Costs

FNS Instruction 796-4, Rev. 4

Labor costs include compensation by sponsors for labor that is required to prepare and serve meals, supervise children during the meal service, and clean up after the meal service.

These costs may include wages, salaries, employee benefits, and the share of taxes paid by the sponsor. Sponsors must keep accurate time and attendance records for all labor costs that are attributed to SFSP.

Other Operating Costs

FNS Instruction 796-4, Rev. 4

Other operating costs may include, but are not limited to:

- Costs of nonfood supplies;
- Rental costs for buildings, food service equipment, and vehicles;
- Utility costs; and
- Mileage allowances.

Sponsors that have “other” costs that are not listed should contact the State agency to determine if they may use Program reimbursement to cover those costs. Sponsors must keep all records and documentation to support any costs that they claim for reimbursement.

Sponsors are encouraged to use forms that help staff collect necessary information to satisfy recordkeeping requirements. For instance, sponsors can use forms to perform meal counts, keep milage and time records for administrative and operative tasks, track administrative expenses, and outline food service equipment needs. For a variety of sample forms, see Appendix 2.

Civil Rights Requirements

7 CFR 225.7(n) and FNS Instruction 113-1

State agencies must comply with requirements for racial and ethnic participation data collection, public notification of the nondiscrimination policy, and reviews to assure that discrimination on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity is prohibited. Sponsors must have written policies and procedures that assign Program responsibilities and duties and ensure compliance with civil rights requirements.

All participating sponsors must inform potential participants of the availability of SFSP. In addition, all sponsors and their sites are required to:

- Display in a prominent place at the site and in the sponsor’s office, the *And Justice for All* poster developed or approved by FNS.
- Make Program information available to the public upon request.
- Take reasonable steps to ensure meaningful access for persons with limited English proficiency, including providing information in an understandable language.
- Ensure that translations are accurate concerning the availability and nutritional benefits of the Program.
- Make reasonable modifications in policies, practices, and procedures to ensure individuals with disabilities have equal access and effective communication when accessing the Program. For more information on modifications to accommodate disabilities, see *Reasonable Modifications for Children with Disabilities* in Unit 4.

- Include the appropriate FNS Nondiscrimination Statement, and instructions for filing a complaint, in their public release and in any Program information directed to parents of participants and potential participants. The USDA Nondiscrimination Statement to be posted or used on forms, brochures or vital documents can be found at <https://www.fns.usda.gov/civil-rights/usda-nondiscrimination-statement-other-fns-programs>,
- Ensure that meals are served to all attending children, regardless of their race, color, national origin, sex (including gender identity and sexual orientation), age, or disability.
- Discourage overt identification of eligible children whenever possible.
- Ensure that all children have equal access to services and facilities at the site regardless of race, color, national origin, sex (including gender identity and sexual orientation), age or disability.
- Complete Civil Rights training annually.

For additional information, see FNS Instruction 113-1, *Civil Rights Compliance and Enforcement*, November 8, 2005, <https://www.fns.usda.gov/cr/fns-instruction-113-1>.

Race and Ethnicity Data

FNS Instruction 113-1

Each year, every sponsor must determine the number of potentially eligible participants by race and ethnicity for the area served. This information may be obtained from census data or public school enrollment data.

The sponsor also must collect race and ethnicity data each year for each site under the sponsor's jurisdiction. Sponsors of residential camps must collect and maintain this information separately for each session of the camp. For all other sites, the sponsor must count the participating children at least once during the site's operation. When collecting this data, sponsors cannot use visual identification. This means sponsors may not collect racial and ethnic data simply by looking at participants, but instead should use methods that are based on self-identification and self-reporting.

See [SFSP 07-2021, *Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Rescission*, May 17, 2021](#), <https://www.fns.usda.gov/cn/Race-and-Ethnicity-Data-Policy-Rescission> and [SFSP 05-2022, *Questions and*](#)

[Answers Related to CACFP 11-2021, SFSP 07-2021 Collection of Race and Ethnicity Data by Visual Observation and Identification in the Child and Adult Care Food Program and Summer Food Service Program – Policy Rescission, June 13, 2022, https://www.fns.usda.gov/cn/qas-related-collection-race-and-ethnicity](https://www.fns.usda.gov/cn/qas-related-collection-race-and-ethnicity), for more information.

To provide flexibility and ensure data accuracy, separate categories must be used when collecting and reporting race and ethnicity. Ethnicity must be collected first. Respondents must be offered the option of selecting one or more racial designations.

The minimum designations for collection are:

Ethnicity:

- a. Hispanic or Latino

A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term “Spanish origin” can be used in addition to “Hispanic or Latino.”

- b. Not Hispanic or Latino

Race:

- a. American Indian or Alaska Native

A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

- b. Asian

A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

- c. Black or African American

A person having origins in any of the black racial groups of Africa.

- d. Native Hawaiian or Other Pacific Islander

A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

e. White

A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

A State agency may have categories for race in addition to the ones required by FNS. However, when it reports the information to FNS, the State agency must report using the FNS required race categories.

The sponsor must retain data, as well as documentation for the data, for the required 3 years. The sponsor must use safeguards to prevent the data from being used for discriminatory purposes. The safeguards include allowing access to Program records containing these data only by authorized personnel.

See Appendix 2 for a *Prototype Racial and Ethnic Data Form*.

Questions and Answers

How often can sponsors add sites?

Generally, sponsors may add sites to their Program at any time during the approved operational period. However, the sponsor must provide the State agency with all the necessary information on each additional site and receive approval before serving and claiming meals at the new sites. Sponsors should check with their State agency for more specific guidance.

What are some advantages to operating school-based sites?

As trusted, familiar, community-based organizations, schools are well-positioned to serve summer meals. SFAs operating NSLP and SBP are already familiar with the meal pattern standards, have trained staff and proper kitchen equipment, and will have an easier time adjusting to the Program than many other organizations. Schools can operate either SFSP or SSO, the latter of which allows schools to continue to provide NSLP meals during long vacation period and requires less administrative paperwork.

In addition, schools may have an easier time conducting participant outreach. Schools are already required to conduct SFSP outreach in the spring and have a direct connection to children and families living in the neighborhood. Schools also often have learning and recreation opportunities available for children during vacation periods, which can help boost attendance. Because of the benefits of hosting sites at schools, the State agency must give priority to SFAs when approving sponsors.

What should sponsors consider when deciding their staffing needs?

It is very important for the sponsor to provide adequate personnel for overall Program management and monitoring to fully comply with Program requirements. Depending on a sponsor's Program, many positions will require only part-time employment, particularly in the planning and closeout phases. The need for recordkeeping personnel varies according to the size of the Program. To meet monitoring requirements, FNS recommends one monitor for every 15 to 20 sites in urban areas. The number of monitors necessary for rural sites may increase depending upon the geographic area to be covered. Also, varied opening and

closing dates of individual sites may affect staffing needs. In every case the sponsor must provide adequate personnel for overall Program management and monitoring.

What are some things to consider if staff is hired to prepare food onsite?

Sponsors should determine the number and types of meals served and consider the budget amount at their disposal. FNS encourages sponsors to consider qualified people who may be willing to serve as volunteers. All food service employees must meet health standards outlined by local and State authorities. Lastly, sponsors should ensure that, at a minimum, food service employees understand the goals of SFSP, the meal pattern requirements, the importance of serving meals that meet the Dietary Guidelines, and food safety and sanitation rules. FNS encourages sponsors to contact their State administering agency for training resources.

Once a sponsor is approved to operate the Program, what are their training responsibilities?

Training is one of the sponsor’s major administrative responsibilities. A smoothly operating Program will require that training be provided by sponsors throughout the duration of the summer. A comprehensive training effort, including weekly or biweekly meetings on Program requirements, will help to make certain that the monitoring, site, and administrative personnel are complying with SFSP regulations. Sponsors must attend State agency training and then train both their administrative and site personnel before these staff members undertake their responsibilities. SFSP regulations require that no food service site may operate until personnel at the site have attended at least one of the sponsor’s training sessions. This is an annual requirement.

Are unpaid staff or volunteers also required to be trained?

Yes, training should be commensurate with the type of activities the volunteers will be participating in.

What are the sponsor’s monitoring requirements for the SFSP?

An efficient and capable monitoring staff is essential to the success of any sponsor’s Program. Monitors must ensure that the site operates the Program according to Program guidelines. This requires a pre-operational visit, an initial site visit, and a full meal service review. Pre-operational site visits are conducted before a site operates the SFSP. These visits are required for all new sites, sites that experienced operational problems the previous year, and existing sites that are new to non-congregate meal service. The visits will

help the sponsor determine that the site has the facilities and capacity to provide meal service for the anticipated number of children in attendance.

A sponsor must also conduct initial site visits within the first 2 weeks of operations to all new sites, all existing sites that are new to providing non-congregate meal service, sites that experienced operational problems the previous year, and any other site that the State agency has determined needs a visit. Initial site visits will ensure that the meal service operations are running smoothly and allow the sponsor to verify information, such as the site address, storage, holding and preparation facilities, and serving capabilities.

Sponsors must also conduct full meal service reviews of all sites at least once during the first 4 weeks of Program operations to observe delivery or preparation of meals, service of meals, children eating the meals, and clean up after meals. Flexibilities exist for sponsors to conduct a full meal service review during the time of the initial site visit. This is particularly helpful for sites operating non-congregate meal services that may be further from the sponsor's administrative offices.

Will the sponsor's Program be reviewed by the State agency?

Sponsors will receive a periodic administrative review by State agency staff during the course of operations, which will include a review of the office and at least one site. Sponsors must make records available for review and must take any corrective actions required by the State agency. Results of the review may affect the amount of reimbursement the sponsor will receive. The review may involve assessing how the claim for reimbursement is prepared and looking at the records maintained by the sponsor. It will also include a look at site operations to observe the meal service and the site's recordkeeping.

Can sponsors contract out any of their management responsibilities?

Sponsors may not contract out certain management responsibilities, such as monitoring, staff training, enforcing corrective action, or preparing Program applications and claims for reimbursement. Sponsors remain legally responsible for ensuring that the meal service operation meets all requirements specified in the agreement they sign with the State agency.

SFAs, however, may comply with NSLP requirements for contracting with FSMCs, outlined in 7 CFR 210.16, in lieu of the SFSP requirements at 7 CFR 7 CFR 225.15(m). SFAs that choose to contract with FSMCs for some or all aspects of the management of NSLP may allow the FSMC to conduct the same activities for SFSP

that are performed for NSLP. However, the SFA must maintain responsibility for submitting claims. The SFA also remains accountable for ensuring that all SFSP requirements are met. See SFSP 04-2013 - REVISED, *Summer Feeding Options for School Food Authorities*, November 23, 2012, www.fns.usda.gov/summer-feeding-options-school-food-authorities.

What type of Program records do sponsors need to keep?

To substantiate claims for reimbursement, sponsors must keep all records of meal counts taken daily at each site; operating costs, including food and other costs; administrative costs, including labor and supplies; and funds accruing to the Program. In addition, records need to be maintained that document the training sponsors have provided for their sites and administrative personnel. Sponsors must also keep records that document that they have met monitoring requirements, records that document the sponsor's Program eligibility, such as the application and the signed agreement with the State agency.

How long are sponsors required to maintain these records?

Sponsors must maintain all records for 3 years following the submission date of the final claim for reimbursement, or longer if required by the State agency. Records can only be disposed of if there are no unresolved audit findings, or the Program is not under investigation. For audit and review purposes, these records will need to be made available upon request to Federal and State agency personnel.

Do sponsors need to display the *And Justice for All* posters at pick up sites and for home delivery transportation?

The *And Justice for All* poster must be prominently displayed, such as in a window or a wall at a congregate meal site, on all vehicles making door-to-door drop deliveries at homes, and in all pick up facilities and locations providing non-congregate meal service in rural areas. State agencies and sponsors must ensure that outreach strategies and meal service does not discriminate based on race, color, national origin, age, disability, or sex (including gender identity and sexual orientation).