

TO: 2007 Summer Food Service Program (SFSP) Sponsors
FROM: Paul Flinter, Chief
Bureau of Health/Nutrition, Family Services and Adult Education
DATE: July 9, 2007
SUBJECT: **Operational Memorandum #06-07 - SFSP**
Issues Relating to Meal Service at Sites

This memorandum addresses issues pertaining to meal service at sites in the SFSP and provides specific procedures for implementation.

Meals Served to Adults

The primary purpose of the SFSP is to provide food service to children from needy areas during the period when area schools are closed. Meals may be served to adults under certain specific circumstances. However, they must be treated differently from those served to children who are the intended recipients of the program's benefits. The program makes a distinction between "program adults" and "non-program adults" and the rules that apply are different. The two types of adult meals and the way they must be treated are explained below:

- **Meals Served to Program Adults**

A "program adult" is one who works with the meal service at the site in either a volunteer or paid capacity. A sponsor may choose to serve meals free to adults who meet this definition. Although meals served to program adults may not be claimed for reimbursement in the same way as a child's meal, the cost of meals served to program adults is a legitimate operating cost. A sponsor is reimbursed for whatever is less: (1) the number of meals served to children multiplied by the applicable per meal rate of reimbursement; or (2) for actual operating costs.

- **Meals Served to Non-Program Adults**

Meals served to non-program adults are **not** reimbursable. Furthermore, the cost of these meals may be counted as part of the sponsor's operating costs only if the adults pay the full cost of the meal and the money received is reported as income to the program. If meals are served to non-program adults, sponsors must charge the adults at least the full cost of the meal (including food and non-food supplies, labor, and the value of commodities) or the sponsor must use other non-program funds to cover the cost of these meals.

- **If the sponsor chooses to serve meals to adults, the following rules must be observed:**
 - If the number of meals is limited, all children must be fed first.
 - Income from the sale of adult meals and/or non-program funds used to pay for adult meals must be reported as income to the program on the claim form to offset reported costs.
 - Meals served to children, program adults, and non-program adults must be counted and recorded separately on the daily meal count form.
 - A decision to serve meals to adults may require additional site staff to maintain program safety and integrity.

Meal Pattern Portion Size Options for Children Under Six and/or Teenagers

The meal pattern requirements for the SFSP are designed to provide nutritious and well-balanced meals to each child. The amounts of each component required for the SFSP are designed for children who are 6 to 12 years old. However, children of other ages may also be served meals at a SFSP site, and sponsors or site administrators may feel that the amounts may not be suitable for children of other ages. If this is the case, the following guidance is provided:

- **Portion Size Options for Children Under Six**

Section 225.16(f)(2) of the regulations allows State agencies to authorize sponsors to serve food to children under six years of age in smaller quantities than are indicated in the SFSP meal pattern. The sponsor must be able to ensure that variations in portion size are in accordance with the age levels of the children served. **Sponsors wishing to serve children under one year of age need additional approval from the Child Nutrition Office.** In both cases, the sponsor must follow the age-appropriate meal pattern requirements contained in the Child and Adult Care Food Program (CACFP) Regulations (7CFR part 226). Furthermore, the form of the food should be suitable to the age of the children so that it can be easily consumed during the meal service period. For example, if fruit is cut into smaller pieces, it is easier for younger children to eat. *A copy of the CACFP meal patterns for children under 6 years of age is attached.*

- **Portion Size Options for Teenagers**

Section 225.16 also allows children age 12 through 18 to be served larger portions than the minimum quantities specified for the SFSP based on the greater food needs of older children. Also, as a reminder, extra foods may always be served to improve the nutrition of participating children (that is, in addition to the food necessary to meet the meal pattern requirements).

Off-Site Consumption of Foods

In the past, it has been required that the entire SFSP meal be consumed on site because of the potential health hazards and possible problems of program abuse posed by off-site consumption. Specifically, there is the possibility of children becoming ill by eating perishable items from the meal many hours later and the potential of misuse of foods taken off-site.

However, sponsors and site supervisors have long complained that children who cannot complete their whole meal on site should be allowed to take an apple away to eat later. While this appears to be a reasonable request, the distinction of what may and may not be taken off-site and the additional burden placed on site supervisors of monitoring and making such determinations have prevented this from being allowed in the past.

Although there is still a concern about food safety and sanitation and the possibility for program abuse, the United States Department of Agriculture (USDA) believes that to minimize food waste and provide flexibility, some relaxation of the off-site consumption prohibition is warranted. Therefore, the following items that are part of the fruit/vegetable component of the meal may be taken off-site for later consumption. (*The food must have been from the child's own meal or left on a "sharing table" by another child who did not want it.*):

- whole pieces of fruit, e.g., apple, banana, peach, etc.;
- canned fruit in sealed container;
- juices in originally sealed container; and
- vegetables (uncooked) wrapped.

The following items may **not** be removed from the site.

- cut melons;
- coleslaw; and
- potato salad.

If a sponsor wishes to allow off-site consumption of an item not listed above, contact the Office of Child Nutrition. A case-by-case determination will be made.

Allowing foods to be taken off-site may place a burden on site supervisors. ***Sponsors should only institute this policy if they believe they have adequate staffing to properly administer and monitor the site for compliance.*** If problems arise, and are observed during a monitoring visit, the State agency reserves the right to terminate the sponsor's option to implement off-site consumption.

Section A of the enclosed form must be used to indicate which policies will be implemented for 2007.

Requirement for Meals Prepared in Schools

SFSP regulations permit School Food Authorities that serve meals prepared in schools participating in the National School Lunch Program (NSLP) and the School Breakfast Program (SBP) to substitute the meal pattern requirements of the NSLP and SBP for the meal pattern requirements of the SFSP. The purpose is to reduce the burden on local schools that participate in the SFSP by permitting them to continue using a meal planning system that is familiar, while at the same time ensuring that meals served in the SFSP meet a recognized nutrition standard.

In recent years, the range of meal planning options available to local schools has expanded, and given this diversity of options, meals prepared by schools may now differ considerably from meals prepared using the SFSP meal pattern. Nevertheless, school sponsors who prepare meals for their own sites and non-school sponsors that contract with schools to provide meals may serve meals under the SFSP that meet the requirements for the school meal programs. This encompasses the menu planning options specified in the School Meals Initiative (SMI) regulations, including Traditional Food Based, Enhanced Food Based, NuMenus and Assisted NuMenus. It must be noted that there are no optional planning alternatives for snacks served under the NSLP. Therefore, snacks prepared by schools must meet the SFSP meal pattern for snacks, which is the same for both programs.

This approval to depart from the specific SFSP meal pattern does **not** extend to operational requirements. **Non-school sponsors are not authorized to implement offer-versus-serve at their sites.** Sponsors must provide advance notification by completing Section B of the enclosed form if the school program meal planning option will be implemented.

Permissible Use of "Offer Versus Serve" (OVS)

School Food Authorities implementing OVS during the school year may use the OVS option at all school-sponsored sites. This option can be implemented using the guidelines for meal pattern choices used during the school year for breakfast, lunch and supper, or using the SFSP meal pattern for lunch or supper. OVS cannot be used for breakfast if the SFSP meal pattern is used. ***To reiterate, non-school sponsors are not authorized to implement OVS at their sites.***

Complete and return the attached form via fax or email to Susan Bohuslaw by July 11, 2007.

The fax number is (860) 807-2127 and email is susan.bohuslaw@ct.gov. Questions regarding the issues discussed may be directed to Susan Bohuslaw at (860) 807-2073 or Robert Zwack at (860) 807-2081.

PF:sbs

Enclosures

**CONNECTICUT STATE DEPARTMENT OF EDUCATION
SUMMER FOOD SERVICE PROGRAM (SFSP)**

Issues Relating to Meal Service – 2007

Sponsor Name: _____

Agreement No.: _____

Name of Person Completing Form: _____

The responses below represent the policies that will be implemented for SFSP 2007:

SECTION A (All Sponsors)

	<u>Yes</u>	<u>No</u>
A) Meals served to program adults	_____	_____
B) Meals served to non-program adults	_____	_____
C) Meal pattern portion size option for children under six is requested	_____	_____
D) Off-Site consumption will be implemented at sites. (If yes, provide list of sites on reverse of this form.)	_____	_____

SECTION B (School Sponsors Only) <i>DO NOT COMPLETE THIS SECTION ONLY IF YOU ARE NOT A SCHOOL SPONSOR</i>

	<u>Yes</u>	<u>No</u>
E) Offer-Versus-Serve (OVS) will be utilized at <u>all</u> sites sponsored by a school food authority.	_____	_____
F) Offer-Versus-Serve (OVS) will be utilized at <u>selected</u> sites sponsored by a school food authority. (Provide list of sites on the reverse of this form.)	_____	_____
G) SMI Menu Planning Option will be used for the sponsor's own site operation and meals vended to non-school sponsors (indicate option):	_____	_____

- Traditional Food Based
- Enhanced Food Based
- NuMenus
- Assisted NuMenus

Signature: _____

Date: _____