

**Summer Meals for Kids
in Virginia**

**2003 Guide for
Camp Sponsors**

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Summer Meals for Kids in Virginia 2003

Introduction

We continue to distribute this *Guide for Camp Sponsors* for camp organizations that operate as sponsors in the Virginia Summer Food Service Program (SFSP). This *Guide* is not intended to replace the *Administrative Guidance for Sponsors*, but is intended to supplement the *Administrative Guidance*. Some Camps had complained that the guidance specific to camp sponsors was difficult to find and follow in the *Administrative Guidance* because it is mixed in with guidance for all other types of sponsors.

The rules and regulations for camps participating in the SFSP are significantly different from those affecting other types of SFSP sponsors and it is important that they be clearly understood by camp sponsors. Therefore, we have extracted those rules specific to camp sponsors from regulations and other policy documents and compiled them in this *Guide*. This *Guide* highlights those areas of SFSP administration and operation that relate specifically to camps and further expounds on some policies where we felt it necessary. Since we are trying to meet your needs in properly administering and operating the SFSP, we welcome any comments or suggestions you may have to improve this *Guide*.

We have updated this *Guide* again for the 2003 season. All changes have been highlighted with shading. One change to the Guide that we draw your attention to is the CAMP REPORT discussed on page 20 and included in the Attachments.



What is a Camp in the SFSP?



Camps means residential summer camps and nonresidential day camps that offer a regularly scheduled food service as part of an organized program for enrolled children. *Nonresidential* camp sites shall offer a continuous schedule of organized cultural or recreational programs for enrolled children between meal services.

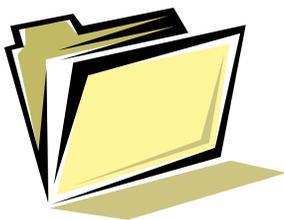


NOTE: Many *Upward Bound Program* and some *National Youth Sports Program* sponsors, for SFSP purposes, are considered *residential* or *non-residential* camps because they are residential in nature or they are serving more than two meals per day.

Application for Sponsorship

Site Information Sheet

For administrative purposes only, each session of a camp is considered a separate feeding site in the same way that a "regular" sponsor will have separate feeding locations. *Camp sponsors must complete a separate Site Information Sheet for each camp session.*



This is because camp sessions may vary in the number of eligible children being served SFSP meals. Perhaps even the number of days each session operates and/or the types of meals being served vary from session to session. **All** these factors enter into determining the number of meals to be served and, therefore, the projections for the amount of administrative and operating reimbursement.

If you participated last year, remember that the *Site Information Sheets* are **preprinted** this year with much of the information you submitted last year. Some fields that have purposely been left blank for you to complete anew each year. You should complete the blank fields and carefully review the preprinted fields to make certain they are up-to-date. If you make any changes to the preprinted fields, please write over the preprinted information in **RED** so it will be obvious to our reviewers.

Along with the *Site Information Sheet*, you must provide documentation showing the **number of eligible children enrolled in each session** (i.e., those who meet the Program's income standards). If such documentation is not available at the time of application, it must be submitted as soon as possible thereafter but, in no case, later than the filing of the your *Claim for Reimbursement*.

Media Release

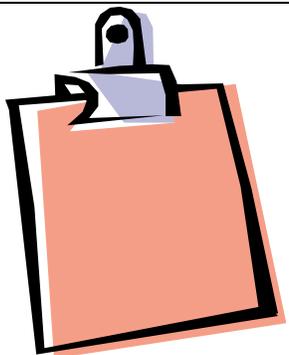


All SFSP sponsors are required to announce annually - in the media serving the area from which it draws its attendance - the availability of free meals. *Camps* must announce annually to all participants the availability of free meals for *eligible* children. All media releases issued by camps must include:

1. the family-size and income standards for reduced price school meals labeled "SFSP Income Eligibility Standards";
2. a statement that children who are members of Food Stamp households or TANF assistance units are automatically eligible to receive free meal benefits at eligible program sites; and
3. a statement that meals are available without regard to race, color, national origin, sex, religion, age, disability, political beliefs, sexual orientation, or marital or family status.

A sample new release was provided to all sponsors as part of the sponsor application packet.

Eligibility of Campers



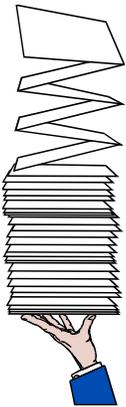
Unlike other types of sites, camps do not have to establish income eligibility at the 50 percent level, which open, restricted open or closed enrolled sites must do. Instead, camps are reimbursed **only** for meals *served* to children who meet the income eligibility criteria. There is no minimum percentage of free-and-reduced-price-meal eligible children required in order for a camp to qualify as an SFSP site.

Nonresidential camps are "enrolled" sites, but must provide organized cultural or recreational programs for enrolled children. Like residential camps, *nonresidential camps* may only claim reimbursement for meals served to children for whom they have individually approved income eligibility forms.

In order to determine enrolled children's eligibility, camp sponsors to use the **Income Eligibility Form** or an approved equivalent form. Sponsors of residential or nonresidential camps must obtain income eligibility forms and make individual determinations for all enrollees since camps are reimbursed only for the SFSP meals served to those children eligible for free-or-reduced-price schools meals. [See following section, **Income Eligibility Form.**] **Meals served to children for whom there are no approved eligibility forms may not be claimed for reimbursement.**

Sponsors of camps are not required to submit the individual households' approved eligibility forms to USDA. However, camp sponsors must maintain the original approved forms for all eligible children in separate files for each camp session. In addition, the forms must be available for review by USDA.

Income Eligibility Form



As a residential or nonresidential camp in the SFSP, you must collect and maintain individual family size and income data on the children who are enrolled. The **Income Eligibility Form**, found in Attachment I, is a multi-program prototype that was designed by USDA/FNS to determine the income eligibility of applicants for Child Nutrition Programs. For the SFSP, the **Income Eligibility Form** should be used by camps to determine the income eligibility of enrolled children. The information collected on the **Income Eligibility Form** includes household size and household income or the case number for benefits received under the Food Stamp Program; the Temporary Assistance to Needy Families (TANF); or the Food Distribution Program on Indian Reservations (FDPIR). Camp sponsors may also use alternate forms they develop as long as the same information is captured as found on the **Income Eligibility Form** in Attachment I.

A copy of the USDA **Income Eligibility Form** is also included in the *2003 Administrative Guidance for Sponsors* with instructions at Attachment 3. The current *Income Eligibility Guidelines* are also included at **Attachment III a)**; however, these are the *Guidelines* in effect only through June 30, 2003. Copies of the *Income Eligibility Guidelines* for the period **July 1, 2003 to June 30, 2004** are included at **Attachment III b)**.

In order to determine enrolled children's eligibility, camp sponsors should:

1. copy and utilize the **Income Eligibility Form** (Attachment I) to document the eligibility of the children enrolled in your program;

OR

2. camp sponsors may choose to incorporate this form's elements into your organization's existing eligibility document. If you intend to incorporate the information from our form, you must be certain to include all the required data detailed below. This process must be completed no later than the deadline date for submission of the 2003 SFSP application package. Be sure to indicate in your sponsor application whether you will be using the USDA form or one of your own making. If you will be developing your own form, *please be certain to submit a copy of your proposed form (with your sponsor application or earlier) to our office for approval prior to distribution.*

Data Required to be Collected

For those sponsors designing their own form, in order for data collection to be complete for SFSP purposes, the income eligibility form must collect and/or contain the following information:



1. The names of all children for whom application is made;
2. The names of all other household members;
3. The social security number of the adult household member who signs the application or an indication that the household member does not have a social security number;
4. The income received by each household member identified by source of income;
5. The signature of an adult household member;
6. The date the application is completed and signed.

Application based on the household's receipt of food stamp, FDPIR, or TANF benefits. Households may apply on the basis of receipt of food stamp, FDPIR, or TANF benefits by providing the following information:

1. The name(s) and food stamp, FDPIR, or TANF case number(s) of the child(ren) who are enrolled in the Program; and
2. The signature of an adult household member.

Please remember to complete the bottom of the form, which is the category, signature of the determining official of the sponsor and date. This must be done in order to claim the meals served to the child.

Information or Notices Required

Application forms or descriptive materials given to households about applying for free meals **must contain** the following information:

on Application Forms

1. The family size and income levels for reduced price school meal eligibility with an explanation that households with incomes less than or equal to these values are eligible for free Program meals (Note: The income levels for free school meal eligibility must not be included on the application or in other materials given to the household).
2. A statement that a child who is a member of a household that receives food stamp, FDPIR, or TANF benefits is automatically eligible to receive free meals in the Program;
3. A statement that reads, "In certain cases, foster children are eligible for free meals regardless of household income. If such children are living with you and you wish to apply for such meals, please contact us."
4. The following statement that provides notice to the household member whose social security number is disclosed: "We are required by the National School Lunch Act in section 9 to ask for a social security number. Unless a food stamp, FDPIR, or TANF case number is provided for your child, the application cannot be approved without either the social security number of the person who signs the application or an indication that he or she does not have a social security number. The social security number provided may be used to identify the person in checking the correctness of the information provided on the application. This may occur during reviews, audits or investigations of the Program, and it may involve contacting employers to determine income. It also may involve contacting the food stamp or welfare office to determine if your household is receiving benefits. It may be necessary to check with the State employment security office to determine the amount of benefits your household is receiving. Other income information provided by you may be checked. If the information you provide is incorrect, your household may lose benefits and/or claims or legal action may be taken against your household."
5. The statement used to inform the household about the use of social security numbers must comply with the Privacy Act of 1974 (Pub. L. 93—579). If a State or local agency plans to use the social security numbers for uses not described in paragraph (f)(4)(iv) of this section, the notice must be revised to explain those uses.
6. Examples of income that should be provided on the application, including: Earnings, wages, welfare benefits, pensions, support payments, unemployment compensation, social security, and other cash income;
7. A notice placed immediately below the signature block stating that the person signing the application certifies that all information provided is correct, that the household is applying for Federal benefits in the form of free Program meals, that Program officials may verify the information on the application, and that purposely providing untrue or misleading statements may result in prosecution under State or Federal



criminal laws; and

8. A statement that if food stamp, FDPIR, or TANF case numbers are provided, they may be used to verify the current food stamp, FDPIR, or TANF certification for the children for whom free meals benefits are claimed.
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REMEMBER!



Residential and nonresidential camps must maintain on file a completed Income Eligibility Form for each child who receives a reimbursable meal based on family size and income data.

A sample of a letter to send to the parents of the children to be enrolled in your program is included as **Attachments II**. The letter announces your organization's sponsorship of the SFSP and includes a copy of the current income eligibility guidelines (sample *Letters to Parents* are provided at **Attachments II a)** and **b)**). The letter to parents includes paragraphs related to the following:

1. eligibility;
2. income eligibility scale;
3. procedures for households receiving Food Stamps, TANF;
4. procedures for all other households;
5. foster child; and
6. the nondiscrimination statement.

The *Income Eligibility Guidelines* for the period July 1, 2002 through June 30, 2003 and July 1, 2003 through June 30, 2004 are located at **Attachments IX a)** and **IX b)**. These scales must be used to determine the eligibility classifications of all children enrolled for participation in the 2003 SFSP. Income scales from other funding sources may not be used to determine eligibility for the SFSP.

Provide a written policy statement on free meals. This policy statement, which must be approved by USDA explains that:

- meals are free to enrolled children who are documented as eligible for free or reduced price school meals according to the income eligibility guidelines for the NSLP and SBP; and
- the same meal is served to all enrolled children regardless of reimbursement status and without discrimination against any child because of race, color, national origin, sex, age or disability.

Camps that charge separately for meals must also:

- explain that the camp uses USDA's eligibility standards for family size and income levels at the level of reduced price school meals;

- describe how the camp accepts income eligibility applications from campers and assure that children 'whose families receive food stamp, FDPIR, or TANF benefits are automatically eligible for free meals;
 - describe how the camp will collect payments from children who must pay the full price for their meals and how the camp ensures that children receiving free meals are not overtly identified;
 - assure that the camp has a hearing procedure for families who want to appeal a denial for eligibility of free meals; and
 - assure that if a family requests a hearing, the child will continue to receive free meals until a decision is made by the hearing official.
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Hearing Procedure

Each applicant that is a camp shall submit with its sponsor application a copy of its hearing procedures. At a minimum, these procedures shall provide:



1. That a simple, publicly announced method will be used for a family to make an oral or written request for a hearing;
 2. That the family will have the opportunity to be assisted or represented by an attorney or other person;
 3. That the family will have an opportunity to examine the documents and records supporting the decision being appealed both before and during the hearing;
 4. That the hearing will be reasonably prompt and convenient for the family;
 5. That adequate notice will be given to the family of the time and place of the hearing;
 6. That the family will have an opportunity to present oral or documentary evidence and arguments supporting its position;
 7. That the family will have an opportunity to question or refute any testimony or other evidence and to confront and cross-examine any adverse witnesses;
 8. That the hearing shall be conducted and the decision made by a hearing official who did not participate in the action being appealed;
 9. That the decision shall be based on the oral and documentary evidence presented at the hearing and made a part of the record;
 10. That the family and any designated representative shall be notified in writing of the decision;
 11. That a written record shall be prepared for each hearing which includes the action being appealed, any documentary evidence and a summary of oral testimony presented at the hearing, the decision and the reasons for the decision, and a copy of the notice sent to the family; and
 12. That the written record shall be maintained for a period of three years following the conclusion of the hearing, during which it shall be available for examination by the family or its representatives at any reasonable
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time and place.

Meal Service Requirements



Sponsors of camps are only reimbursed for meals served in camps to children from families which meet the eligibility standards for the SFSP. The camp sponsor shall maintain on file a copy of the documentation establishing the eligibility of each child receiving meals under the Program.

Meal service at camps shall be subject to the following provisions:

1. A camp may serve *up to three meals each day* (some combination of breakfast, lunch, supplement and/or supper);
 2. Residential camps are *not* subject to the time restrictions for meal service set forth at paragraphs (c)(1) and (2) of §225.16(b)(1) of the SFSP regulations. (i.e., (1) the requirement that three hours elapse between the beginning of one meal service and the beginning of another and that the service of supper shall begin no later than 7 p.m. and which may not extend beyond 8 p.m. and (2) the requirement that duration of the meal service shall be limited to two hours for lunch or supper and one hour for all other meals); and
 3. A camp shall be approved to serve three meals only if:
 - * it has the administrative capability to do so;
 - * if the service period of the different meals does not coincide or overlap; and
 - * where applicable, if it has adequate food preparation and holding facilities.
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Family-Style Meal Service



Camps may utilize **family-style meal service** in the SFSP.

The SFSP is a means of not only providing nutritious meals to children, but also for helping them to develop good eating habits which they will retain in later years. Both of these nutritional goals can be effectively pursued in summer camp settings through family style meal service, especially when supervising adults stress them through personal example and assistance to children during the meal. Camps offer a good setting for family style meal service because they provide the stable environment it requires. Other types of summer sites are not appropriate for, nor conducive to, successful family style meal service.

Unlike cafeteria lines, unitized meals, and pre-set service, the family style method affords some latitude in the size of initial servings because replenishments are immediately available at each table. This latitude must be exercised in compliance with the following practices, at a minimum:

1. Enough food must be placed on each table to provide minimum portions (Section 225.20) of all required components for all children at the table, and to accommodate program adults supervising meal service at the table if they eat with the children.
2. Some amount of each required component must be placed on each child's plate, and at least a minimum regulatory portion must be offered to the child. This practice may be particularly appropriate when unfamiliar foods are being introduced.
3. When the full portion required by the regulations is not initially served to children, supervising adults must assume the responsibility of actively encouraging the child to accept service of the full portion during the course of the meal.

SECOND MEALS: Camps serving meals family style **cannot** claim reimbursement for second meals. This is because any seconds in a family style setting would be virtually unidentifiable.

USDA Donated Commodities

Sponsors eligible to receive commodities under the Program include:

1. self-preparation sponsors;
2. sponsors which have entered into an agreement with a school or school food authority for the preparation of meals; and
3. sponsors which are school food authorities and have competitively procured Program meals from the same food service management company from which they competitively procured meals for the National School Lunch Program during the last period in which school was in session.



Therefore, most camps are eligible to receive USDA donated commodities. It is recognized that the distribution of donated foods to camps is rather unique due to the generally small number of recipients per site. The types and amounts of foods donated will be dependent, of course, upon the availability of foods at this particular time (summer) of the distribution year. Since camps are eligible to receive commodities under the SFSP regulations, Part 225, they may also receive commodities under Part 250, the Food Distribution Regulations.

In Virginia, sponsors must contact the following person and agency regarding receipt of commodities:

Steven W. Thomas, Director
Food Distribution Program
Department of Agriculture & Consumer Service
P.O. Box 1163 (mailing address)
1100 Bank Street
Richmond, Virginia 23209-1163

TEL: (804) 786-3936 or 3937

FAX: (804) 371-7788

For those of you that participated last year, we have already provided the State Department of Agriculture & Consumer Service with a list of all SFSP sponsors that are eligible for USDA donated commodities. The Department of Agriculture will be in touch with your organization to determine your need for commodities.



CLAIM FOR REIMBURSEMENT **CAMP SPONSORS AND REPORTING COSTS**

Guidance on Taking and Reporting Meal Counts

Camps are reimbursed *only* for those meals served to children who are eligible for free-and-reduced-price meals. Therefore, only the meals served to eligible children can be reported on the *Claim for Reimbursement*. Discussions in regulations and other SFSP guidance related to reporting meal counts generally focus on the *accuracy* of meal counts. For regular sponsors of the SFSP, we have routinely recommended the use of “point-of-service” meal counts to achieve accuracy. That is, site personnel should count meals at the actual point of service of the meals (meals counted as they are served) to the children at each meal. Counting meals at the point of service assures that an accurate count is obtained and it also allows site personnel to ensure that complete meals are served. Nonetheless, regular sponsors are reimbursed for *all* meals served to children at their feeding sites.

In the case of camps, however, there may be a mix of eligible and non-eligible children being served meals. A point-of-service count could compromise the confidentiality of the children who are eligible for free SFSP meals. Unlike children attending regular SFSP sponsors’ feeding sites, children attending camps are strictly accounted for and are fed in a more controlled setting. Camps also do not experience the daily comings and goings of children with which regular sponsors must cope. Therefore, camps are able to arrive at an accurate count of meals served to eligible children by reviewing their meal service records for any given meal and identifying those eligible children that received a meal.

Therefore, camp organizations are generally the only SFSP sponsors we allow to utilize other than the point-of-service method, as long as the method can meet the test of accuracy. Camps must accurately record and report only the number of SFSP meals served to eligible children.

For instance, many camps utilize a copy of their daily attendance roster as a

list upon which to annotate which campers are eligible and received a reimbursable SFSP meal. *Again, your method should be accurate and you must maintain documentation of your meal count recordkeeping.*

A sample of a Meal Count Worksheet for Camps is included in this Guide at Attachment IV.

Guidance on Reporting Allowable & Unallowable Costs



Allowable costs to the SFSP are those that are necessary and reasonable for the proper and efficient administration of the Program. Costs may be either direct or indirect, and some direct costs may be prorated ones as discussed further in this section. No administrative cost may be claimed as an operational cost or vice versa. If for any cost, there is a question on the allowability of it or in which category the cost should be recorded etc., contact this office to receive any assistance needed.

General Requirements



Sponsors must follow the principles outlined in FNS Instruction 796-4, Rev. 4 for determining the applicability and allowability of costs. To determine if a cost is an allowable charge to the SFSP, at a minimum, the cost must meet all of the following general criteria:

1. Is it necessary and reasonable for proper and efficient administration of the SFSP; e.g., is it required or is it reasonable and conform to applicable SFSP Regulations, Handbooks, Policies, Laws, or Instructions?
2. Is it supported by source documents or other required documentation that is available to SFSP reviewers, other officials, and auditors?
3. Is it the net of all applicable credits, which include returns, discounts, allowances, rebates, etc.?
4. Is it a one-time charge to the Program?
5. Is it allocable only to SFSP and not also included as a cost to any other funded program, in the current period, a prior period, or a later period?
6. Are the accounting records consistent throughout the SFSP period?
7. Is it authorized and not prohibited under State or local laws or regulations?

Prorated Costs



Readily identified costs that benefit both the SFSP and other programs of the sponsor, may be prorated as direct costs between the programs. A sponsor should prepare a statement of the basis for allocating costs fairly among the cost objectives benefited and maintain records of how allocations were calculated. For example, a sponsor rents a vehicle that is used 45% of the time during a given month to transport food to SFSP sites. In addition, approximately 15% of time, the vehicle is used to conduct monitoring visits to SFSP sites. The remaining 40% of the time, it is used for other activities not related to the SFSP. Documentation should reflect that 60% of the total transportation costs during the month were SFSP costs. The remaining 40% of the transportation costs must be applied to the other program. If the rental cost for the vehicle for the month were \$150, \$67.50 would be allocated to SFSP as operational transportation costs for transporting food (45%); \$22.50 would be recorded as SFSP administrative transportation costs for monitoring visits (15%); and the remaining \$60 would be allocated to the other program (40%).

Labor Costs

Properly documented compensation paid for labor that is reasonable and necessary for the SFSP services rendered, and that is not charged to any other program, is allowable. These labor costs are allowable when the amounts claimed are based on hourly rates that are documented by payroll records. Hourly rates will be considered reasonable to the extent that they are consistent with rates paid for similar work in the area in which the Program is located. Compensation may include wages, salaries, employee fringe benefits, and the share of associated taxes, that are paid. *The costs associated with personnel who work only a portion of their time for the SFSP must be prorated based on the hours worked for the Program.*

A sample of a **Meal Count Worksheet for Camps** is included in this Guide at Attachment IV.

Operating COSTS



Operating costs are expenses incurred when preparing, delivering and serving meals for the SFSP. To figure out the allowable operating costs, total all actual allowable costs. These costs include, but are not limited to:

- Labor tasks include, but are not limited to:
 1. Processing, transporting, storing, and handling purchased or donated food and transporting equipment and nonfood supplies for use in the Program;
 2. Preparing, delivering, and serving Program meals, and cleanup after

meal services;

3. Supervising food service operations at the site level, including the supervision of food service workers and children; and
 4. Performing recordkeeping tasks at sites, such as participation counts and menu work sheets.
- **Food Costs** - The dollar amount to report on the claim for reimbursement each month for food costs is determined by the type of Program.



- ◊ For self-preparation Programs, the costs incurred in purchasing or preparing meals served to eligible children are allowable costs and should be included in the reported total operating costs. Although meals served to Program adults who perform necessary food service duties are *not reimbursable*, the costs of first meals served to Program adults *are allowable operating costs*. Sponsors have the option to include the cost of meals consumed by Program adults. The cost of meals served to nonprogram adults is NOT an allowable operating cost.
- ◊ For vended Programs, the cost of meals charged in accordance with the contract is allowable. Invoices or receiving documents are used to determine the cost of meals delivered for the month. Simply add the cost of all meals received during the month and subtract any credits as shown on invoices and other statements. If the FSMC includes some nonfood supplies in its unitized meals, costs of these supplies may be claimed as food costs. Report the total as food costs on the claim for reimbursement.



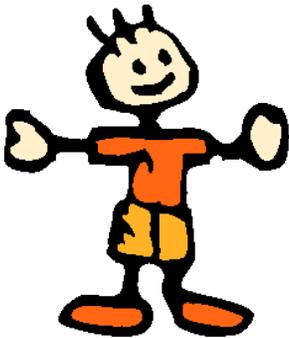
- **Nonfood Costs** - Reasonable costs to sponsors for nonfood supplies necessary to feed children are allowable, if the costs reported are net of all applicable credits, and if those costs are properly documented. Nonfood supplies are food service related items whose usefulness for the operation of a food service will be exhausted after the items are used once or only a few times. Examples include cleaning materials, paper plates, plastic eating utensils, and straws. Purchase of expendable food service equipment may be charged to the Program for the month during which they are purchased, if the equipment is necessary for Program operations and if the prices paid are reasonable.
- **Facilities** - rental of food service facilities and equipment, utilities, repairs involved in food preparation, serving and clean-up
- **Transportation of food**
- **Transportation of children** - rural only
- See *Administrative Guidance for Sponsors* for additional guidance and examples of allowable operating costs.

Camp sponsors must remember that they can only report a *portion* of their operating costs on the *Claim for Reimbursement*. Only the *cost* of

meals served to children eligible for free-or-reduced-price meals and Program adults are allowable; the cost of meals served to others is considered unallowable. For each reporting period, the sponsor should calculate the percentage of operating costs to be submitted. This factor is NOT applied to Program administrative costs.

Operating costs also include the cost of producing meals served to program adults who are performing meal service labor. 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. **Meals served to adults must never be reported as meals served to children.**
- A decision to serve meals to adults may require additional site staff to maintain program safety and integrity.
 - ◊ The sponsor may elect to charge or not to charge adults for meals; however, it is suggested that nonprogram adults pay an appropriate price, equal to or greater than the cost of producing or purchasing the meal. Adult meal payments received must be collected and reported at the end of each claiming period.



Operating REIMBURSEMENT

REMEMBER, SFSP sponsors are reimbursed the **LESSER** of two factors:

1. the **actual** total operating costs;

OR

2. the **maximum** established by the calculation of the number of meals served x the appropriate per meal operational reimbursement rate(s).

Administrative COSTS

Administrative costs are expenses incurred when managing or administering the program. To figure the actual allowable administrative costs, total all allowable costs. These costs include, but are not limited to:

- **Labor** tasks include, but are not limited to:
 1. Preparing and submitting an application for participation, including a management plan that contains a budget of operating and administrative costs, and staffing and monitoring plans;



- administrative costs, and staffing and monitoring plans;
2. Preparation of records required for the SFSP;
3. For camps and enrolled sites, establishing the eligibility of children for free or reduced price school meals. For other sponsors, establishing the eligibility of each site as serving an area in which poor economic conditions exist;
4. Attending SFSP training;
5. Hiring and training site and administrative personnel;
6. Visiting sites to review and monitor operations;
7. If a vended sponsor, preparing a plan for meeting procurement requirements;
8. Preparing claims for reimbursement, and maintaining source documents and worksheets in support of claims;
9. Preparing for audits by a certified public accountant or independent state or local government accountant; and
10. Performing any other administrative functions necessary for planning, organizing, and managing the Program.



- **Establishing the eligibility** of children for free or reduced price school meals
- **Facilities** - rental of office space, equipment and vehicles
- **Use allowance** - for office equipment
- **Office supplies**
- **Vehicle allowance** - mileage, parking expense
- **Communications** - telephone, postage, advertising
- **Insurance** and indemnification
- **Audits**
- See *Administrative Guidance for Sponsors* for additional guidance and examples of allowable administrative costs.

You should only be charging that portion of the administrative cost incurred that benefits the SFSP. If equipment or services were purchased for the sole use of the SFSP, then 100 percent would be allocable to the SFSP. If, however, the purchase is to benefit several objectives, then only the appropriate percentage should be charged to the SFSP. For example, you may use time cards to document the appropriate amount of salaries and benefits charged to the SFSP and cost allocation plans to establish and charge the appropriate amounts for other purchases.

Administrative REIMBURSEMENT

REMEMBER, SFSP sponsors are reimbursed the **LESSER** of three factors:

1. the total **actual** administrative costs;
 2. the **maximum** established by the calculation of the number of meals served x the appropriate per meal administrative reimbursement rate(s);
- OR**
3. the approved administrative budget.

In addition to all the other examples of allowable administrative costs listed below and in the *Administrative Guidance for Sponsors*, camp sponsors should remember that the cost of establishing the eligibility of children for free- or-reduced-price school meals is an allowable administrative labor expense.

Unallowable Costs

Examples of *Unallowable* costs include, but are not limited to:



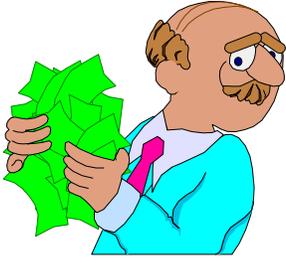
- the cost to purchase *food* (including coffee, etc.) *for use outside the SFSP*;
- the costs of *meals served to administrative adult personnel*, or any other adults that are not food service workers;
- *more than one meal served to a food service/Program adult*;
- *contributions and donations* - money, supplies and food from other groups (including USDA commodities);
- *meals served in violation of Program regulations*; e.g., meals served outside approved serving time, meals or components consumed off-site, second meals served in excess of the 2% tolerance;
- *interest* on loans, bond discounts, costs of financing and refinancing operations, including legal and professional fees in connection therewith;
- *entertainment*; e.g., costs of amusements, social activities, and incidental related costs such as meals, beverages, lodging, rentals, transportation, gratuities, etc.;
- *donated labor*; e.g., volunteer labor or labor funded through other Federal, State, or local government programs;
- costs of *spoiled or damaged meals*;
- repayment of *overclaims* and other Federal debts;
- contributions to a *contingency reserve* or any similar provision for unseen events; e.g. lawyer;
- *fines or penalties* resulting from violations of, or failure to comply with Federal, State, or local laws or regulations;
- *bad debts* which are losses arising from uncollectible accounts and other

claims and related costs;

- *administrative costs not included in the approved budget;*
- *capital expenditures*, including nonexpendable equipment;
- *fund raising expenses*; e.g., financial campaigns, endowment drives, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions;
- *rental or leasing costs for buildings*, facilities, or equipment if the rental agreement includes option-to-purchase, or for periods beyond the close-out date for Program operations;
- costs of *purchasing land*, acquiring or constructing buildings, or making alterations to existing buildings, or any charges for the use of land or buildings;
- *repairs which materially increase the value or useful life of capital assets* (rebuilding of equipment worth \$500 or more). Improvements to facilities when those improvements are of a permanent nature or when the benefits derived from those improvements exceed the duration of Program operations;
- *maintenance costs* of keeping rented facilities in a clean and efficient operating condition *if already reflected in rental fees*;
- *depreciation or use allowance* for publicly owned buildings and improvements;
- *rental or leasing costs* may not be charged to the Program for buildings, food service equipment, or vehicles *owned by the sponsor*;
- *rental for the use of land or buildings used only to serve meals*;
- *rental or leasing fees* may not be charged to the Program *if fees exceed those normally charged* in the sponsor's locality for comparable buildings, food service equipment, and vehicles;
- for vended sponsors:
 - ◇ the cost of *meals delivered by an FSMC to a non-approved site*;
 - ◇ *meals not delivered within the agreed upon delivery time*;
 - ◇ *meals served in excess of the approved CAP*;
 - ◇ *spoiled or unwholesome meals*, or
 - ◇ *meals which do not meet meal requirements or quality standards*.

IMPORTANT: No Program ADMINISTRATIVE cost may be claimed as an OPERATING cost or vice versa.

**PROGRAM
INCOME**



Income is all funds, other than SFSP reimbursement and advance funds, including cash donations and grants, accruing to, transferred to, or collected by a sponsor and designated to be used by a sponsor in its SFSP food service program. For example, 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.

Any credits or income accruing to the program, other than reimbursement for the SFSP meals, must be recorded as income. Credits and income include, but are not limited to:

- income from the sale of adult meals and/or non-program funds used to pay for adult meals must be reported to offset reported costs.
- purchase discounts;
- rebates or allowances;
- recovery or indemnity on losses;
- receipt of incidental services;
- adjustments for overpayment or erroneous charges;
- payments from food sales to non-program adults;
- donations of cash; and
- funds received from Federal (other than SFSP reimbursement from the State agency), State or local government units for the sponsor's food services.

CAMP REPORT

For each camp session, camp sponsors must complete and mail to this office a copy of the attached Camp Report (Attachment III).

Section 225.6(c)(2)(i)(J) of the SFSP regulations requires that all camp sponsors report "the number of children enrolled in each session who meet the Program's income standards. If such information is not available at the time of application, it shall be submitted as soon as possible thereafter and in no case later than the filing of the camp's claim for reimbursement for each session."



Site Monitoring Requirements

Pre-Approval Site Visits

***(i.e., Evaluating
and Selecting
Sites)***

A representative of the sponsor must visit all *new* sites and sites that experienced problems in prior years before such sites are approved for the Program. Sponsors should note the date of the pre-operational visit to each site and the name of the person who visited each site. When they apply for the SFSP, sponsors will have to certify that all required site visits have been conducted. If sponsors wish, monitors may complete the required pre-operational visits. These pre-operational visits must not be confused with required visits during the first week of Program operations.

Site Visit

Sponsors must *visit* each of their sites at least once during the **first week** of operation under the Program and shall promptly take such actions as are necessary to correct any deficiencies. A site visit form must be completed by the sponsor's monitor annotating any problems noted during the visit and the corrective action initiated to eliminate the problems.

We believe that by granting waivers for the first-week visit requirement at well-run, experienced sites, sponsored and operated by experienced staff, sponsors will be able to devote more time to training and monitoring activities during the first-week visits with less experienced employees or less successful programs.

Site Reviews



Site *reviews* must be conducted at the food-operating site at least once during the **first four weeks** of program operations. If a site operates **less** than four weeks, the sponsor must still conduct a review. A site review requires the sponsor to determine if the site is meeting all the various Program requirements. To accomplish this, the sponsor must observe a complete meal service from beginning to end. This includes delivery or preparation of meals, the meal service, and the clean up after meals. If any problems are found at the sites, immediate action must be taken to correct the problems. Sponsors shall complete a monitoring form developed by the State agency during the conduct of these reviews.

Thereafter, sponsors must ensure that monitoring reviews are conducted throughout the summer to ensure the sites comply with Program regulations. A schedule should be developed to ensure that all sites approved under the

sponsor will be monitored at least once during their approved operational period. A sponsor should schedule its site reviews based on the period of operation of each of its SFSP feeding sites; each site must be reviewed within the first four weeks of its SFSP operation. We do not interpret this to mean that all sites must be reviewed within the first four weeks of the sponsor's operation in general. Since many sponsors' sites have varied periods of operation, the review schedule will likely be as staggered as the sites' operating periods.

Documentation of Monitoring

Upon completion of each *visit* and *review*, **documentation must be maintained by the sponsor**. This will allow the sponsor to assess the SFSP operation of each camp location and correct any problems as well as schedule follow-up visits/reviews if required.

Clarification of Camp Monitoring Responsibilities

This is to clarify camp sponsors' responsibility with regard to conducting *visits* and *reviews* of sites. **Camps do *NOT* have to monitor each session as though they are separate sites.**

The purpose of site monitoring is to ensure that the feeding operations at the feeding site are in order and in compliance with health and safety standards and program regulations. Monitoring is geared toward evaluating the operation of the feeding operation, so it is immaterial if the children attending the feeding operation change from week to week. Therefore, since only the children change with each session and since the staff of the camp site does not change, camps need only monitor the camp location as though it is one site location.



This means that, like regular sponsors, camp sponsors must conduct a site *visit* during the first week of operation and a full site *review* during the first four weeks of operation. **ALSO**, some camps do have more than one camp location; these sponsors must *visit* and *review* the separate locations separately.

Generally, camp sponsors operate only one or two actual camp locations and administrative personnel responsible for monitoring their operations may be present at the site(s) frequently. To meet the SFSP regulatory requirements, please remember to take credit for your efforts by completing the applicable form to document your monitoring activities at the appropriate times. You need not complete a monitoring form every time you are at the site (unless you want to!)

If after reading this *Guide*, you have questions or you have suggestions as to how we can improve it, please feel free to call/contact us at:

- **Alan Crane/SFSP Supervisor -** (609) 259-5134
e-mail address alan.crane@fns.usda.gov
- **Sharon Gellman -** (609) 259-5130
e-mail address sharon.gellman@fns.usda.gov
- **Gail Magee -** (609) 259-5137
e-mail address gail.magee@fns.usda.gov
- **FAX -** (609) 259-5196
- **Toll-Free Telephone -** 1-800-448-USDA



Attachments

I.	Income Eligibility Form
II.	a) Sample Letter to Parents for July 1, 2002 - June 30, 2003
	b) Sample Letter to Parents for July 1, 2003 - June 30, 2004
III.	Camp Report
IV.	Meal Count Worksheet for Camps
V.	TIME REPORT - Administrative Staff
VI.	TIME REPORT - Site and Food Service Staff
VII.	MILEAGE RECORD - Administrative Staff
VIII.	MILEAGE RECORD - Site and Food Service Staff
IX.	Income Eligibility Guidelines
	a) July 1, 2002 - June 30, 2003
	b) July 1, 2003 - June 30, 2004

Attn: Summer Meals for Kids

MEAL COUNT WORKSHEET FOR CAMPS

Attachment IV.

	Date																		
	Meals	B	L	S	B	L	S	B	L	S	B	L	S	B	L	S	B	L	S
Camper Name	Code																		
1.																			
2.																			
3.																			
4.																			
5.																			
6.																			
7.																			
8.																			
9.																			
10.																			
11.																			
12.																			
13.																			
14.																			
15.																			
Total Eligible Meals: _____		Total Ineligible Meals: _____						Total Program Adult Meals: _____											
Total Non-Program Adult Meals: _____																			

TIME REPORT - Administrative Staff *

Sponsor name: _____ Sponsor number: _____

Sponsor address: _____

Week of: _____

Hours Worked in SFSP Administration

Name	Hours Per Day							Total Hours Weekly	Hourly Wage	Total Claimable
	S	M	T	W	T	F	S			

I understand that this information is being given in connection with the receipt of Federal funds and that deliberate misrepresentation may subject me to prosecution under applicable State and Federal criminal statutes.

Supervisor's signature

Date

- * Use this form for administrative staff performing administrative cost tasks, that is, tasks related to the administration of the program (e.g. monitors, book keepers, office staff, directors).

TIME REPORT - Site and Food Service Staff *

Site/Sponsor name: _____ Site/Sponsor Number:

Site/Sponsor
address: _____

Week
of: _____

Hours Worked in Food Service

Name	Hours Per Day							Total Hours Weekly	Hourly Wage	Total Claimable
	S	M	T	W	T	F	S			

I understand that this information is being given in connection with the receipt of Federal funds and that deliberate misrepresentation may subject me to prosecution under applicable State and Federal criminal statutes.

Site supervisor's signature

Date

- * Use this form for all site-level and food service staff performing operating costs tasks, that is, tasks directly related to the food service (e.g. meal servers, cooks, supervising children at the site).

