



Summer Food Service Program Waiver Implementation Q&A

Guidance as of 9/4/2020

As published in the August 31 waivers, School Food Authorities (SFAs) may choose to provide meal service under the Summer Food Service Program (SFSP) through December 31, 2020 (subject to available funding) or continue the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The following are questions and answers about the process:

1. What happens if the school food authority has already started participating in the National School Lunch Program in SY 2020-2021?

School food authorities have the option to transition to the Summer Food Service Program. See Question #2 on how to elect participation. The Iowa Department of Education is seeking clarification from the U.S. Department of Agriculture (USDA) of how meals served prior to the date of election should be claimed.

2. How does a school food authority elect participation in the Summer Food Service Program?

The school food authority must complete the [NSLP or SFSP Implementation Plan Survey](#). After the Department reviews the Implementation Plan Survey, school food authorities will receive instructions on next steps for the 2019-2020 and/or 2020-2021 SFSP applications in IowaCNP.

If a school food authority participated in the SFSP in 2019-2020, they can provide meals under SFSP immediately after completion of the [NSLP or SFSP Implementation Plan Survey](#).

If a school food authority did not participate in SFSP in 2019-2020, they are to complete the [NSLP or SFSP Implementation Plan Survey](#) and follow-up with their school nutrition consultant.

3. What schools are permitted to participate in the Summer Food Service Program given these programs have eligibility criteria?

On August 31, the USDA approved an Area Eligibility Extension through December 31. On September 3, the Iowa Department of Education updated the COVID-19 Iowa Area Eligibility plan. Per the updated Iowa plan, school food authorities and sites who participated in the National School Lunch Program in SY 2019-2020 and experienced economic impacts of COVID-19 may elect to participate in the Summer Food Service Program.

4. Are Residential Child Care Institutions (RCCIs) permitted to elect Summer Food Service Program participation?

No, RCCIs may not participate in the Summer Food Service Program.

5. Which entity takes priority for application approval, a school or a community partner, to avoid duplication of services?

The Department must ensure that organizations and sites approved to operate SFSP during this expanded SFSP season provide good community coverage but do not duplicate services. Community sites may not be approved for operation if the area is already adequately covered by



SFA sites. The Summer Food Service Program regulation 7 CFR 225.6(B)(5) can help prioritize applications, it reads: The State agency must use the following priority system in approving applicants to operate sites that propose to serve the same area or the same enrolled children:

- (i) Public or nonprofit private school food authorities;
- (ii) Public agencies and private nonprofit organizations that have demonstrated successful program performance in a prior year;
- (iii) New public agencies; and
- (iv) New private nonprofit organizations.
- (v) If two or more sponsors that qualify under paragraph (b)(5)(ii) of this section apply to serve the same area, the State agency must determine on a case-by-case basis which sponsor or sponsors it will select to serve the needy children in the area. The State agency should consider the resources and capabilities of each applicant.

6. If a school elects participation in the Summer Food Service Program, can the school claim all meals served to students under the elected program?

According to the [Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020](#), the waiver extensions support school food authorities utilizing all manners of instruction, whether in-person, virtual, or hybrid education models. Accordingly, a school may serve all children meals at no cost, use a simple meal count sheet and claim all meals served to children for free reimbursement under the elected program.

7. What meal pattern do I follow?

If the school food authority elects the Summer Food Service Program, the SFA may follow either the more basic SFSP meal pattern OR the NSLP and SBP meal patterns. The school food authority will identify in the IowaCNP SFSP site application which meal pattern was selected. Only meals meeting the elected program meal pattern may be counted and claimed for reimbursement.

8. What meal pattern flexibilities do I have?

USDA expects and strongly encourages program operators to maintain and meet the nutrition standards for each program to the greatest extent possible. Given the circumstances of the current public emergency, the U.S. Department of Agriculture and the Iowa Department of Education understands this is not always possible. Additional information will be issued by the Department about meal flexibility requests.

9. [The Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020](#) says that “FNS reserves the right to withdraw this approval subject to availability of funding”. What does this mean?

The waiver allows the Summer Food Service Program to continue to operate through December 31, if funding is adequate. If funding is not adequate, USDA reserves the right to end the program extension at an earlier date than December 31. If this happens, the Iowa Department of Education will notify school food authorities as quickly as possible with the new end date. On January 1, 2021 or earlier date specified by the USDA, school food authorities will resume meal service under the National School Lunch and School Breakfast Programs.



10. If a school operates under the Summer Food Service Program, should the school collect Free and Reduced Student Meal Applications and complete the verification process?

Schools must resume National School Lunch Program and School Breakfast Program operations January 1, 2021 or earlier date specified by the USDA. As such, schools should continue to collect and process Free and Reduced School Meal Applications and run direct certification matches to be ready to resume the National School Lunch and School Breakfast Program operations in January 2021. The Department is seeking clarification from the USDA on the timing of the annual application verification process.

11. If a school elects the Summer Food Service Program, may the school distribute the Fresh Fruit and Vegetable Program (FFVP) snacks at FFVP program approved schools?

Yes. Schools approved for the Fresh Fruit and Vegetable Program may continue distribution of fresh fruit and vegetable snacks. The FFVP is approved for parent/guardian pick up and multiple snacks may be served at the same time if the school is following a multiple day distribution model. Iowa did also receive a waiver to allow for the distribution of FFVP snacks at sites that are not elementary schools, if students are participating in online learning or a hybrid model. These snacks are still intended to be provided ONLY to children from the FFVP participant schools.

12. If my school operates the Summer Food Service Program until December 31, 2020, which reimbursement rates will be used?

The current SFSP reimbursement rates are valid January 1, 2020 to December 31, 2020.

Breakfast - \$2.3750, Lunch/Supper - \$4.1525, Snack - \$0.9775

These are the reimbursement rates for self-preparation sponsors and vended sponsors in rural areas. Reimbursement rates are slightly lower for vended sponsors or sponsors with FSMCs in urban areas.