

Summer Food Service Program – Seamless Summer Option School Year 20-21 Extension Questions and Answers

In response to the nationwide waivers released on Monday, August 31, 2020 this document serves to answer common questions. This question and answer document is the first document in response and will be updated. More information will be provided in bulletins.

Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) Extension: The USDA Food and Nutrition Services published nationwide waiver extensions for the SFSP and the SSO through **December 31, 2020** or until funding is exhausted. The waiver extensions can be accessed at [Child Nutrition COVID-19 Waivers](#).

- 1. Question: *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?***

Answer: The waiver allows the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) to continue with area eligibility waivers through December 31, 2020 or earlier if funding is exhausted. If funding is not adequate, USDA reserves the right to end the program extension at an earlier date than December 31, 2020. If this happens, MDE-FNS will contact school food authorities as quickly as possible with the new end date via a Special Bulletin.

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.

- 2. Question: Does the CLiCS application need to be approved before starting the SSO or SFSP?**
No, however sponsor and site applications must be submitted before meal service begins. School Food Authorities will be given first priority to operate SFSP/SSO in an area and SFA SFSP/SSO applications will be approved prior to community organization SFSP applications.

SFAs Updating CLiCS Applications

SFSP/SSO is still in program year 2021 and therefore the 2021 site and sponsor applications should be updated and submitted. SFAs should submit their application or update their approved application as soon as possible.

SFA sponsors that operated SFSP/SSO beyond July 1, 2020 are already approved and will only need to update their site applications or add their additional site applications as necessary.

New SFSP/SSO sponsors will need to submit both site and sponsor applications prior to operation. Refer to the MDE website for guidance for new sponsors.

According to the USDA waivers, the availability of funding will determine the closing date, which may be prior to December 31, 2020.

Necessary application updates:

- a. closing date of the application to December 31, 2020 (site application)
- b. site classification:
 - closed-enrolled, open, etc. (site application)
- c. number of days for the months operating (site application)
- d. meal types and meal times as applicable (site application)
- e. budget to best of ability (sponsor application if applicable)

Because the waivers are extended through December 31, 2020, or earlier if funding is exhausted, SFAs should continue to update and submit their NSLP/SBP applications in order to allow for a smooth transition on January 1 or earlier.

Community Organizations Updating CLiCS Applications

Community organizations should work with the school food authority in an area to determine if the school food authority will be operating SFSP/SSO as an open site. If a community organization knows the SFA will not operate SFSP/SSO in an eligible area, the community organization can operate SFSP. Applications need to be submitted prior to operation. *Submission of a site application does not guarantee approval.*

The community organization should also update their SFSP Program Year 2021 applications, both site and sponsor applications need to be updated. Community organizations that begin serving meals without being approved will be doing so at their own risk.

3. Question: Which SFA sites are permitted to participate in the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) given these programs have eligibility criteria?

Answer: All school food authorities and affiliated sites which participated in the NSLP/SBP in school year 2019-2020 may elect to participate in the SFSP/SSO. School food authorities new to the NSLP/SBP in school year 2020-2021 will be reviewed on a case by case basis for SFSP/SSO election.

4. Question: Are Residential Child Care Institutions (RCCIs) permitted to elect Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) participation?

Answer: No, Residential Child Care Institutions (RCCIs) may not participate in the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO).

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

Answer: 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. Question: If a school elects participation in the Seamless Summer Option (SSO) or Summer Food Service Program (SFSP), can the school claim all meals served to students under the elected program regardless of the learning model chosen?

Answer: Yes, a school may serve all students meals at no cost, use a simple meal count sheet and claim all meals served to children for free reimbursement under the SFSP/SSO until December 31, 2020 or earlier if funding is exhausted.

7. Question: If an SFA participates in Seamless Summer Option (SSO) or Summer Food Service Program (SFSP), which meal pattern should be followed?

Answer: If the school food authority elects the Summer Food Service Program (SFSP), the school food authority can follow the SFSP or the National School Lunch Program and School Breakfast Program meal patterns. If the school food authority elects the Seamless Summer Option (SSO), the school food authority must follow the National School Lunch Program and School Breakfast Program meal patterns.

8. Question: What meal pattern flexibilities are available for each child nutrition program? Answer: The US Department of Agriculture released the following waivers to address meal pattern flexibilities. In order to participate in the waivers, sponsors must submit a request to the state agency. Instructions for applying for these additional waivers will be provided in a future bulletin.

[Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - EXTENSION 7](#)

[Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs – EXTENSION 4.](#)

9. Question: If a school operates under the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO), should the school collect Free and Reduced Student Meal Applications and complete the verification process?

Answer: Schools must resume NSLP/SBP operations January 1, 2021 or an 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 NSLP/SBP operations in January 2021 or when funding is exhausted.

This is also critical for identifying compensatory aid for public schools and MARSS deadlines still apply.

We are seeking clarification from the USDA on the timing of the annual application verification process.

10. Question: If a school elects the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO), may the school distribute the Fresh Fruit and Vegetable Program (FFVP) snacks at FFVP program approved sites

Answer: Yes. Sites approved for the Fresh Fruit and Vegetable Program may continue FFVP distribution. FFVP is approved for parent/guardian pick up and multiple FFVP snacks may be served at the same time if the school is following a multiple day distribution model. Minnesota also has a waiver that FFVP can be picked up at alternative sites.

11. Question: If a site operates the Summer Food Service Program (SFSP) or the Seamless Summer Option (SSO) and provides breakfast and lunch daily, can the site operate the National School Lunch Program After-School Snack Program?

Answer: No, if the site operates the SFSP/SSO, the site may only be reimbursed for up to two meals per day. The site may not participate in the SFSP/SSO **and** the NSLP/SBP at the same time.

However, eligible sites can also operate CACFP At-Risk program for snack and supper. Program integrity must be maintained.

12. Can a site provide holiday and weekend meals if operating SFSP/SSO?

Answer: Yes, holiday and weekend meals can be provided under SFSP/SSO in addition to non-school days, but are not required.