

DECEMBER 04, 1998

SUBJECT: Summer Food Service Program (SFSP) Policy Memorandum #3-99:
Issues Relating to Meal Service at Sites

TO: Regional Directors
Child Nutrition Programs
All Regions

This memorandum addresses issues relating to meal service, including policy on off-site consumption of certain food items. It is a continuation, without any changes, of SFSP Policy Memorandum #3-98, issued on February 27, 1998. This memorandum is effective upon issuance, and will remain in effect until superseded by regulation or future memorandum.

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. Meals may be served 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 *the lesser of* the number of meals served to children multiplied by the applicable per-meal rate of reimbursement or 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 CHANGES 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 an 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, State agencies should provide the following guidance:

- **Meal pattern changes for children under six.** Section 225.16(g)(2) of the regulations allows State agencies to authorize sponsors to serve food in smaller quantities than are indicated in the SFSP meal pattern to children under six years of age. 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 their State agency. In both cases, the sponsor must follow the age-appropriate meal pattern requirements contained in the Child and Adult Care Food Program (CACFP) Regulations (7 CFR 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.
- **Meal pattern changes 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, the Department has 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 for 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 Department believes that to minimize food waste and provide flexibility, some relaxation of the off-site consumption prohibition is warranted. Therefore an apple or other similar fruit or vegetable item that is part of the vegetable/fruit component of the meal may be taken off-site for later consumption. The food must have been from child's own meal or left on a "sharing table" by another child who did not want it.

We believe that allowing foods to be taken off site may place a burden on site supervisors. Therefore, each State agency must determine if this policy will be allowed within that State and may prohibit a sponsor from using this option if there is a question as to whether they will be able to provide adequate site monitoring. Furthermore, sponsors should institute this provision only if they believe they have adequate staffing to properly administer and monitor this provision. States and sponsors choosing to implement this provision should monitor and evaluate the use of the provision to ensure that problems do not arise.

Please share this information with your State agencies. If you have any questions, please contact Melissa Rothstein or Ron Ulibarri.

/ORIGINAL SIGNED/

STANLEY C. GARNETT
Director
Child Nutrition Division

Attachments (Meal Patterns)