



**United States
Department of
Agriculture**

Food and
Nutrition
Service

Western Region

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Room 400
San Francisco, CA
94108-2518

Ms. Phyllis Bramson-Paul
Director, Nutrition Services Division
California Department of Education
1430 N Street, Suite 1500
Sacramento, CA 95814

SA 9-3-1 CA

Re: Summer Meal Service Program Clarifications and Changes

Dear Ms. Bramson-Paul:

USDA is pleased to share five policy clarifications to the current Summer Food Service Program (SFSP) regulations designed to assist sponsors to serve more children responsibly while streamlining and simplifying program administration. These clarifications are the product of discussions among SFSP/Seamless site operators, sponsors, advocates, NSD and USDA staff. As these policies are currently in place in other states, where they are working effectively, their implementation in California is strongly encouraged. With careful implementation, these changes should contribute to higher participation, lowered operating costs, and more effective operations. All the clarifications and changes made apply both to the SFSP and Seamless waiver sponsors operating summer meal sites under the National School Lunch Program (NSLP).

Parents In Summer Meal Eating/Serving Area

Problem: To maintain control many sponsors believe parents are prohibited inside the eating area. Sponsors frequently rope off “child-only” feeding areas and prevent parents from sitting with their children. Some sponsors mistakenly believe parents are prohibited from the meal service area and from helping young children carry lunch trays and open food packages. This practice can discourage parents from bringing young children to participate in the SFSP and can burden site staff with additional work assisting small children.

Update: U.S. Department of Agriculture Food Nutrition Service and California Department of Education’s Nutrition Services Division do not encourage this practice, nor require sponsors to restrict eating areas to just children. The SFSP is for all children under 19 years old. NSD encourages sponsors to allow parents into the meal service area, especially to assist young children with their meals. Separating parents from their children is not encouraged and should only be instituted when adults eating meals is a chronic problem which cannot be corrected any other way.

Action Steps: Encourage site staff to develop and post local procedures for allowing adults in the eating area. Also, encourage the parents to bring a snack or meal to enjoy

lunch with their children. Local food banks may assist with offering snacks to adults. Post information in English and Spanish specifying that while parents are allowed in the eating area, SFSP meals are for only for children.

At sites with a problem of parents eating from their children's plates we encourage, sites to work with parents to understand that SFSP meals are for persons under 19 years old. Furthermore, sponsors should inform parents if persistent violations of the regulations continue, it may result in disallowed meals and/or loss of the program for the community.

Designated Eating Area

Problem: Sites operating in small areas, such as the courtyard of an apartment complex or a room in a recreation center may not be able to seat all children waiting for lunch at the beginning of the designated lunch time.

Update: USDA and NSD encourage site flexibility with designated eating areas to accommodate children, site staff and facility constraints. For example, children may take meals outside of the immediate serving area – outside to the park, courtyard, or recreation center as long as site staff supervises the activities during the entire meal service. Site staff is still responsible for ensuring a child does not leave the site with an entire meal (see clarification below). Staff remains responsible for preventing parents from eating any parts of the child's meal.

Action Steps: Encourage sponsors to establish sites as needed and to broaden designated eating areas, if necessary, to accommodate children and facility limitations. Local site staff maintains all site responsibilities for ensuring on-site meal consumption and proper garbage disposal, etc.

Traveling Apple

Problem: Children often do not finish all their meal components during the short mealtime. Many sites use a "goodie box" to collect unopened items and redistribute them to children as second servings. But, too often half-eaten food items are thrown in the garbage, particularly if a child begins lunch near the end of the designated feeding time.

Update: USDA and NSD encourage sponsors to allow children who do not finish their entire meal to take food items such as fruit and vegetable components or other nonperishable food items away from the SFSP site. However, entrees, milk, and any food item that will quickly spoil must never be taken from the site.

Action Steps: Encourage sponsors to train staff and parents to allow certain types of foods to leave the sites. Sponsors should determine which food items from the menu can be consumed off-site. Sponsors should implement this option where sufficient staff can train parents and ensure this practice is properly managed.

Obtaining Area Eligibility

Problem: Confusion exists about what sources of information may be used to qualify SFSP sites.

Update: USDA and NSD encourage sponsors to obtain school free and reduced-price meal percentages to qualify potential SFSP open or closed enrolled sites from <http://www.cde.ca.gov/ds/sh/sn/>

Action Steps: Sponsors should use the web to update site qualifications annually. Sponsors are to list the school district and school that meets the SFSP eligibility criteria on the Site Information Sheet (50%+ of children attending the local school qualify for Free or Reduced Price school meals). Additionally, U.S. Census Bureau, Migrant, Tribal, or Housing Authority data may also be used to qualify sites.

Open Sites In Close Proximity

Problem: Confusion over determining site overlap is an ongoing concern. Traditionally, sites have not been allowed to operate nearby one another, with regulations giving schools priority. In some areas, this has limited new site growth, restricting program access in high-need neighborhoods.

Update: USDA and NSD now allow multiple, open sites to operate in the same community if the sites meet the following conditions: 1) each site serves its own audience, 2) meal service is offered at the same/similar time and for a similar length of time (to prevent children from going to more than one site for the same meal).

Action Steps: Encourage sponsors and reviewers to work with other sponsors and sites to ensure the sites serve separate audiences at similar times.

Please distribute the enclosed clarifications and changes to your SFSP and Seamless waiver sponsors within 30 days.

Sincerely,

JANET ALLEN, Director
Special Nutrition Programs
Western Region

