



Implementing Simplified Summer Food

Simplified Summer Food eliminates the complicated accounting rules that require sponsors to calculate their actual costs and divide their expenses into operating and administrative costs. Now, all sponsors receive the full federal reimbursement rate, regardless of costs. Most sponsors already receive the maximum reimbursement rates, so for many sponsors the benefits of Simplified are in changes made to administering the program. In order to make Summer Food easier to administer, there are a number of things that states should do to implement Simplified fully.

Claim for Reimbursement

States should revise their claiming form. They should remove the lines that ask for actual administrative and actual operating costs. Instead, they should just ask sponsors to fill in the number of meals that they served. This change decreases the amount of time that sponsors spend filling out their claim form.

Budget

Most sponsors are still required to submit a budget, but the budget is no longer tied to reimbursement. Sponsors are no longer penalized because of differences in actual costs and costs outlined in the budget. Instead, the budget really is now a planning tool that sponsors can use to manage their Summer Food Programs. State agencies no longer have to check the budget against the reimbursement process, and determine the actual reimbursement. Instead, states can use the budget to determine the feasibility of the program and consider it an opportunity to provide technical assistance to the sponsor to help ensure the financial viability of the program.

In addition, since sponsors are no longer required to separate out operating and administrative costs in order to receive their claim, there is no reason to require sponsors to identify costs as operating or administrative when developing the budget. Instead, states should require sponsors to include the costs for running the program without breaking them out into administrative or operating costs. This will make the program less confusing for sponsors and make the sponsors' administrative responsibilities more consistent.

USDA does give states the authority to waive this requirement for experienced school food service sponsors, and states should. For school food service directors who are used to administering much larger programs, the budget is an exercise in unnecessary paperwork.

A number of schools that switched from Summer Food to Seamless Summer Option are now interested in switching back to Summer Food in order to get the higher Summer Food reimbursement. This gives schools more funding to improve nutrition quality, serve more sites, operate more days, or conduct outreach. States should talk to their regional offices about the possibility of waiving the budget for strong school food service authorities that have been feeding children during the summer and want to switch back to Summer Food.

Training

Most states spent a significant amount of time at trainings explaining the old Summer Food rules for comparing costs in order to determine reimbursement. This part of the training should be revised to reflect the new Simplified rules. State agencies will still need to cover other financial management requirements, such as the necessary, reasonable, and allowable test for SFSP funds, but the time saved in not explaining cost comparisons can be used to discuss outreach strategies, best practices, etc.

Posting of Reimbursement Rates

States should list the full reimbursement on the web and in printed materials, instead of listing separate operating and administrative reimbursements. It can be confusing to sponsors who have heard that the program has changed and that there is no wall between operating and administrative costs. USDA posted the combined reimbursement on its website at www.fns.usda.gov/cnd/summer/ReimbursementRates/Simplified_reimburse_rates_current.html after listing the reimbursement separately in the Federal Register.

Materials

All of the outreach and training materials need to be updated to remove confusing references to and explanations of Summer Food's previous cost comparison requirements.

Monitoring

States need to modify the way they approach the monitoring visits. State agencies should focus their monitoring efforts on ensuring successful management of the program and making sure that the quality of the meal service is maintained.

For example, state reviewers still need to validate costs and review the legitimacy of those costs, but sponsors are not required to break out costs into operating or administrative categories. Rather, it is up to the state agency how it chooses to determine operating and administrative costs as necessary for monitoring program operations. For most sponsors, the receipt should be enough documentation to demonstrate cost. States should review their monitoring forms and make any revisions necessary.

Promotion

States should use the new Simplified rules as an opportunity to promote participation. States can reach out to sponsors who dropped out of the program due to the paperwork and encourage them to operate Summer Food again. In addition, Summer Food is notorious among summer programs for the amount of administrative work it requires. By letting potential sponsors know that the program is now easier to run, states may be able to bring in new sponsors that did not participate due to Summer Food's reputation. FRAC has developed an outreach toolkit to assist states in their promotion efforts. It is available at http://www.frac.org/afterschool/summer_toolkit.htm.

States also should make a special effort to recruit schools to run Summer Food. Schools are no longer required to maintain a separate nonprofit food service account for Summer Food. Like all other sponsors, they automatically receive the full Summer Food reimbursement, which is significantly higher than the reimbursement for school meals. This gives schools more resources to provide healthier meals and serve additional sites and children throughout the summer than they would receive under the Seamless Summer Option.