

Comparison of Summer Food Service Program (SFSP) and School Nutrition Programs (SNP) and the Seamless Summer Option (SSO) for the 2021-2022 School Year

In order to assist schools that are weighing their options for continuing to participate in the federal meal programs for the 2021-2022 School Year, we have developed the following comparison chart. We know that many schools have participated in the School Nutrition Programs (SNP) in the past, the SNP includes the National School Lunch Program, School Breakfast Program, After School Snack Program and the Special Milk Program. Additionally, the Seamless Summer Option (SSO) is a subprogram of the SNP, which is traditionally utilized during extended breaks from the traditional school year.

During the 2020-2021 School Year, the USDA provided waivers that allowed for many schools to participate in the Summer Food Service Program (SFSP), in order to meet the unprecedented needs of students during the Covid-19 Pandemic. As schools begin to plan for the 2021-2022 School Year, the USDA has provided waivers to allow schools to participate in the SSO program through the school year. In order to assist schools in determining if they would like to continue to provide federal meals, we have developed this chart to provide a comparison of the different programs. If you participated in SFSP for the 20-21 SY and are considering SNP or SSO, please review the chart for similarities and differences.

Schools will have the option of participating in either the SNP or the SSO programs for the 21-22SY. As you can see from the chart, SNP and SSO are very similar, however SSO would allow the SFA to provide meals at no cost to all students. If you were not in the SNP during the 2019-2020 or the 2020-2021 SY, you will need to complete the new applicant process. Please visit our [new applicant webpage](#) for more information and the forms that will need to be completed and submitted to our office. The new applicant process for SNP (which includes SSO) generally takes 60-90 days to complete, therefore we HIGHLY recommend submitting the required paperwork as soon as possible if you have not participated in SNP in the last 2 years. Additionally, if you are going to receive meals through a contract for your 2021-2022 SY please reach out to our procurement team at nutritionprocurement@isbe.net as soon as possible.

Important Note: for SY21-22 Schools can only participate in SNP or SSO during the regular school year. SFSP is not an option during the school year, see Timeframe of Participation section for a description of when schools can participate in SFSP.

Topic	SFSP	SNP	SSO
Eligible Sponsors	<ul style="list-style-type: none"> • Public or private non-profit local education agencies; • Entitles of state, local, municipal, or county government; • Residential camps; and • Private nonprofit organizations with 501(c)(3) status. 	<ul style="list-style-type: none"> • Public Schools, Charter Schools & ROE's • Non-profit registered Non-Public Schools • RCCI's & Juvenile Detention Centers • Camps (milk program only) 	<ul style="list-style-type: none"> • Same as SFSP (Summer 2021) • Same as SNP (School Year 2021-2022)

Timeframe of Participation	<p>May – September for those that utilize a traditional school calendar</p> <p>October-April during unanticipated school closures (i.e. emergencies)</p> <p>During student vacations of 15 days or more for schools on a continuous year calendar.</p>	<p>When school is officially in session. Whether that be the traditional August-May timeline or for schools that utilize the year around school calendar. Participants must offer SNP meals on all official school days.</p>	<p>SY21-22: USDA waivers allow participation by approved SNP sponsors and sites during the school year.</p> <p>Traditional Years: Same as SFSP</p>
Meal Service Locations	<p>Schools, Camps, Churches, Community Centers, Housing Projects, Libraries, Migrant Centers, Parks, Playgrounds, Pools, and Other public sites where children gather.</p>	<p>Schools, RCCI's, Juvenile Detention Centers, Camps (milk program only)</p>	<p>SY21-22: The USDA waiver states the SSO program may be utilized by schools for in-person or remote meal service.</p>
Site Eligibility Requirements to Participate	<p><u>Open sites:</u> 50 percent or more of the children in an area qualify for free or reduced-price school meals based on school or census data.</p> <p><u>Enrolled sites:</u> 50 percent or more of the children in an area qualify for free or reduced-price school meals based on school or census data or 50 percent or more of enrolled children are eligible for free or reduced price meals determined by approved application or certified by school district.</p> <p><u>Migrant sites:</u> Certification by a migrant organization that the site(s) serves children of migrant farm workers.</p> <p><u>Camps:</u> Offer a regularly scheduled food service as part of an organized program for enrolled children. Must have an income application on file for each camper or verified by school.</p>	<p><u>Schools:</u> All official public schools, charter schools and ROE's are eligible to participate, regardless of the low-income status of the school or school district.</p> <p><u>Non-public schools:</u> that are non-profit and that have successfully completed the annual registration process with the Illinois State Board of Education are eligible to participate in the SNP, regardless of the low-income status of the school or district.</p> <p><u>RCCIs:</u> Public and licensed, non-profit, private residential childcare institutions are eligible to participate in the SNP.</p>	<p>SY21-22: The USDA waivers allow all schools to participate in SSO regardless of their ability to meet the area eligibility requirements.</p>
Who Can Participate	<p><u>Open Sites:</u> Meals free for all children 18 years and under.</p> <p><u>Closed Enrolled Sites:</u> Meals free for all students enrolled in the school building site or enrolled program.</p> <p>*persons 19 or older with a physical or mental disability, as defined by the State.</p>	<p><u>Schools:</u> Students enrolled in a school of high school grade and under, including persons enrolled in a school program for the mentally or physically disabled</p> <p><u>RCCI's:</u> persons under 21 enrolled in a RCCI.</p>	<p>SY21-22:</p> <p>Closed Site: Includes students enrolled in the school that are in Preschool-12th grade, including persons enrolled in a school program for the mentally or physically disabled.</p> <p>Open Sites: Includes students enrolled in the school that are Preschool-12th grade (same as a closed site) and meals may be served to children ages 18 and below that are not enrolled in the school. Eligibility and specifics for this option coming soon. This is only available for schools</p>

			that have not returned to traditional in-school learning. RCCI's: persons under 21 enrolled in a RCCI
Meal Costs for Children	All meals are free. *Although camps are only reimbursed for children who qualify for free or reduced-price meals, camp sponsors may, and usually do, provide meals free of charge to all children.	Eligibility Determination must be made for each household. This may be done through: <ul style="list-style-type: none"> Utilizing the State Agencies Direct Certification system which provides a listing of students enrolled in their school that receive SNAP, TANF and Income Eligible Medicaid. Through a determination of a household being homeless, migrant or runaway or By a household completing an application that provides their household income information or a SNAP or TANF number. *Please note that staff must have ample time to process determining the eligibility of each household for free and/or reduced meals each year. *High poverty schools may meet the requirements to participate in the Community Eligibility Program (CEP) in which all students would receive breakfast and lunch at no cost.	SY21-22: All meals offered at no cost. Note: for SFAs choosing SSO for SY21-22, the Household Eligibility Application is not required for purposes of the federal meal programs. However, the SFA may need household socioeconomic data for other purposes, such as fee waivers, for completing the Student Information System (SIS) report and/or for grants. SFAs may develop their own form or may use this Household & Income form , which is similar to the Household Eligibility Application (HEA) but is not for the federal child nutrition programs. ISBE has developed a HEA vs. Alternative Socioeconomic form comparison chart to assist SFAs in determining what they will do for SY21-22.
Types of Meals	<ul style="list-style-type: none"> Breakfast Lunch Snack (a.m. or p.m.) Supper <p>Most sites can only be reimbursed for a maximum of 2 meals each day however, serving lunch and supper on the same day is not allowed.</p> <p>Only migrant and camp sites can be reimbursed for 3 meals each day.</p>	<ul style="list-style-type: none"> Breakfast Lunch After-School Snack Special Milk <p>*Participants cannot be in milk and any of the other meal programs for the same children. Ex. a school cannot be in milk and lunch unless the milk is only for students that don't have access to lunch like a ½ day Pre-K that leaves before lunch service.</p>	<ul style="list-style-type: none"> Breakfast Lunch/Supper Snack <p>SSO participants can only select 2 of these meal types. However, if an SFA wants to do breakfast and lunch through SSO, they may also do After School Snacks through the NSLP After School Snack Program or they can do snacks and/or suppers through the CACFP meal program.</p>
Meal Service Time Requirements	FY 20-21: USDA has waived set mealtime parameters.	SY21-22: USDA has waived set mealtime parameters with an approved waiver.	SY21-22: USDA has waived set mealtime parameters with an approved waiver.
Meal Counting	Count all meals on meal count sheet at point of service.	Meal counts must be taken by eligibility status of free, reduced or paid in a way in which student eligibility status remains confidential. Examples of acceptable meal counting methods include scan	SY21-22: Count all meals that meet the meal pattern requirements served to students daily and for each meal service (breakfast, and/or lunch.)

		cards, biometrics scanners, pin pads, and/or by student name.	
Reimbursement Rates Click here to see all Programs Reimbursement Rates	<u>Effective January 1, 2021- December 31, 2021</u> <u>Rural or Self-Prep</u> Breakfast: \$2.4625 Lunch/Supper: \$4.3175 Snack: \$1.0200 <u>Urban or Vended</u> Breakfast: \$2.4150 Lunch/Supper: \$4.2500 Snack: \$0.9975	<u>Effective July 1, 2020 - June 30, 2021</u> P=Paid, R=Reduced & F=Free Meals <u>Breakfast:</u> P - \$0.32, R - \$1.59, F - \$1.89 *high poverty sites may be eligible for increased reimbursement rates. <u>Lunch:</u> P - \$0.40, R - \$3.18, F - \$3.58 *reimbursement listed includes the add'l 7 cent performance reimbursement. High poverty districts/SFA's may be eligible for increased reimbursement rates.	<u>Effective January 1, 2021-December 31, 2021</u> Breakfast: \$2.4625 Lunch: \$4.3175 Note: January 1, 2022 new rates will be released and go into effect through June 30, 2022.
Sponsor/SFA Monitoring of their own Program(s)	Pre-operational visits before a new or problem site operates the summer program. Site visits the first week of operation (waived for sites that operated successfully the previous summer). Site review during first 4 weeks of operation, followed by additional monitoring as needed. <u>Public Health Sanitation Inspection</u> Each sponsor must send a letter to their local health department informing them of their intent to participate in the SFSP.	On-Site Reviews have been waived for SY21-22. <u>Public Health Sanitation Inspection</u> Each school year SFAs must contact public health to request two food sanitation inspections for each site where food is prepared or served.	SY21-22: On-Site Reviews have been waived for SY21-22. <u>Public Health Sanitation Inspection</u> Each school year SFAs must contact public health to request two food sanitation inspections for each site where food is prepared or served.
Monitoring by the State Agency (SA)	Site Reviews are conducted periodically throughout the Summer to ensure sponsors and sites are operating successfully and with integrity. Administrative Review every three years; more frequently based on program size and prior problems identified by the SA. The objectives are to determine whether the SFA meets program requirements, provide technical assistance, secure any needed corrective action, and assess fiscal action, if applicable.	Administrative Reviews (AR) AR's are composed of two parts, that will be conducted during the same program year on a three year cycle. <u>Meal Compliance and Accountability Review (MCAR)</u> - The objectives are to determine whether the SFA meets program requirements, provide technical assistance, secure any needed corrective action, and assess fiscal action, if applicable. <u>Resource Management Review</u> - includes four general areas: Maintenance of Non-Profit School Foodservice Account, Paid Lunch Equity (PLE), Revenue from Nonprogram Foods and Indirect Costs Procurement Reviews (PR) PR are separate from the AR and are a review of procurement procedures and policies, along with reviewing purchases made with funds from the	SY21-22: Reviews similar to the Administrative Reviews (AR) that are conducted for schools in the National School Lunch Program (NSLP) will be conducted by ISBE staff. These reviews may be in-person or desk audits. See the NSLP/SBP section for the details of the AR. Procurement Reviews Same as SNP

		nonprofit school food service account during the review year. The purchases will be reviewed to ensure they followed applicable procurement regulations and that contracts are being managed appropriately by the SFA. Procurement Reviews are on a three-year cycle.	
Requirements for All Foods Sold	Not applicable	All foods and beverages sold on the school campus between midnight through 30 minutes after the end of the school day must meet the Smart Snacks requirements. This includes A la Carte, vending machines, schools stores, etc. The requirements include both nutritional standards and serving size maximums. The details are available on our Smart Snack website along with helpful resources .	SY21-22: Same as SNP
Fundraisers	Not Applicable	All revenue from the sale of any food or beverage that is sold to students in the food service area(s) during the meal period shall accrue to the nonprofit school lunch program account. Fundraisers sold on the school campus during the school day but not during the meal service and/or not in a food service area must either meet the Smart Snacks requirements or must adhere to the Illinois Exempted Fundraiser Day requirements.	SY21-22: Same as SNP
Wellness Policy	Not required	The SFA must develop a local wellness policy that meets all federal requirements and it must be assessed at least once every three years.	SY21-22: Same as SNP
Procurement & Contracts	Federal Procurement rules and regulations must be followed when using federal funds to pay for the product and/or service. SFAs that plan to contract with a Vendor are required to provide all Invitation for Bid and Contract documents to ISBE prior to beginning the solicitation process in order for ISBE to review the IFB to determine regulatory compliance.	Federal Procurement rules and regulations must be followed when using federal funds to pay for the product and/or service. SFA's must have written procurement procedures and codes of conduct specific to the SNP. SFAs that plan to contract with a Food Service Management Company (FSMC) or Vendor are required to adhere to a three-step submission and review process to ensure compliance with all federal and state regulations and statutes. SFAs will work closely with ISBE staff prior to beginning the solicitation process through this	SY21-22: Federal Procurement rules and regulations must be followed when using federal funds to pay for products and/or services. The USDA has allowed for some flexibility due to the COVID-19 Emergency and may allow amendments to current contracts if certain criteria are met. If you are contracting, plan to contract and/or amend your contract contact ISBE procurement staff at nutritionprocurement@isbe.net

		required three-step process and must submit all required documents to ISBE.	
Reimbursable Paid Meal Pricing Requirements	Not Applicable	The USDA has established a requirement for the price that SFAs must charge or work towards charging for paid meals, it is called Paid Lunch Equity (PLE) . There is a PLE tool that must be completed each year and maintained by the SFA. All new applicants must agree to charge the required paid meal price the first year that they operate the NSLP & complete the PLE tool annually.	SFAs operating SSO only during SY 21-22 do not need to follow PLE requirements for SY 21-22 per Child Nutrition Response #97, the Nationwide Waiver to Provide Flexibility for School Meal Programs Administrative Reviews of School Food Authorities Operating Only the Seamless Summer Option in SY 2021-22 . It is still suggested to maintain PLE and publish pricing for the community to know where prices would stand if SSO was not available, while announcing SSO.
Verification of Applications	Not Applicable	Verification is required annually for all SFAs. SFAs are required to verify 3% of the Household Eligibility Applications that they approved for free and reduced meals. This involves contacting households to provide you with documentation of the information provided on their application. SFA staff must then review the documentation to ensure it matches the information provided on the application. This process may result in some household's eligibility category changing. The SFA would need to notify the household of the change and update all of their eligibility systems. Lastly, the SFA must complete an online report of the results of their verification process.	Should an SFA choose to use the Household Eligibility Application (HEA) they would be required to conduct the verification process on 3% of the HEAs received between July 1 and October 1, 2021. If an SFA only uses an Alternative Socioeconomic form and does not receive any HEAs between July 1 and October 1, 2021, then they would not need to conduct verification. ISBE has developed a HEA vs. Alternative Socioeconomic form comparison chart to assist SFAs in determining what they will do for SY21-22.
Annual Training Requirements	SFSP applicants are required to attend training by ISBE on an annual basis prior to participation.	The USDA established professional standards for State and local school nutrition programs personnel in regards to hiring for new School Nutrition Programs Directors and establishes required annual training hours for all School Nutrition Programs Employees.	SY21-22: While training is still recommended, the professional standards annual training hour requirement under 7 CFR 210.30(b)(3), (c), and (d) are not applicable in SSO (waiver #85; Questions and Answers for CNP Operations in SY21-22, #2 , dated Sept. 29, 2021). Any hours accrued and documented during SY21-22 can count toward the training hour requirement in SY22-23. Other requirements with regard to hiring still apply.

The Meal Pattern Requirements for both SNP and SSO are the same, see chart below. The USDA has released meal pattern waivers that can be applied for on an individual basis if certain criteria are met. The meal pattern waivers are not blanket waivers, they must be applied for with the ISBE. Documentation of the reasoning will be required, ISBE will review each request and provide the sponsor with approvals and/or denials of each waiver request.

Meal Pattern Comparison Chart for the School Nutrition Programs and Summer Food Service Program				
	Summer Food Service Program		School Nutrition Programs & Seamless Summer Option	
	Breakfast	Lunch	School Breakfast Program	National School Lunch Program
Components	<ul style="list-style-type: none"> Grains Fruit/Vegetable/Juice Milk 	<ul style="list-style-type: none"> Grains Meat/Meat Alternate Fruit/Vegetable/Juice Milk 	<ul style="list-style-type: none"> Grains Fruit Milk 	<ul style="list-style-type: none"> Grains Meat/Meat Alternate Fruit Vegetable Milk
Grains	Required; must be whole grains or enriched grains	Required; must be whole grains or enriched grains	Required; 100% of grain offerings must be whole grain-rich ²	Required; 100% of grain offerings must be whole grain-rich ²
Meat/Meat Alternate	Not required; may be served as an additional breakfast item	Required	Not required; may contribute to grain component	Required
Fruit	Fruit or vegetable, or 100% juice	2 or more kinds of fruits or vegetables, or 100% juice, or combination must be offered; no more than 50% of offerings may be in the form of juice	Required; no more than 50% of weekly offerings may be in the form of 100% juice	Required; no more than 50% of weekly offerings may be in the form of 100% juice
Vegetable			Not required; may contribute to fruit component if offered	Required; minimum serving size requirements must be met weekly for each vegetable subgroup: red/orange, dark green, legumes, starchy, and other ²
Milk	Required; no restrictions on fat content or flavor	Required; no restrictions on fat content or flavor	Required; flavored or unflavored non-fat (skim) or (1%) ¹ ; must offer at least 2 varieties ^{2, 4}	Required; flavored or unflavored non-fat (skim) or (1%) ¹ ; must offer at least 2 varieties ^{2, 4}
Serving Sizes	Serving size requirements same for all ages	Serving requirements same for all ages	Must meet serving size requirements based on grade groups: K-5, 6-8, or 9-12 ²	Must meet serving size requirements based on grade groups: K-5, 6-8, or 9-12 ²
Dietary Specifications	No dietary specifications	No dietary specifications	Weekly limits for calories, sodium ³ , and saturated fat based on grade groups; no trans fat allowed	Weekly limits for calories, sodium ³ , and saturated fat based on grade groups; no trans fat allowed

¹Through USDA memo [SP 11-2021](#), sponsors may offer flavored 1% milk through September 30, 2021. Following this date, sponsors can no longer offer flavored 1% milk without an approved waiver (refer to the [Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022](#)).

²Through the USDA's [Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022](#), sponsors participating in the National School Lunch Program, School Breakfast Program, and Seamless Summer Option may apply on a case-by-case basis to waive whole grain-rich, vegetable subgroup, milk type and variety, and/or grade group serving size requirements. Requests must be targeted and justified based on plans to support access to nutritious meals while minimizing potential exposure to COVID-19. Requests will be approved or denied on a case-by-case basis. Approved waivers will be effective starting October 1, 2021. Sponsors without approved waivers must meet the meal pattern requirements above.

³The USDA is allowing sponsors to waive sodium requirements in the National School Lunch Program, School Breakfast Program, and Seamless Summer Option through the [Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022](#). All requests submitted through the ISBE waiver process will be automatically approved and effective starting October 1, 2021. Sponsors with an approved waiver must still meet Sodium Target 1 requirements. Sponsors that do not submit a request through the ISBE waiver process must meet the Sodium Target 2 requirements.

⁴The USDA's [COVID-19: Child Nutrition Response #74](#) waives the requirement that sponsors must offer a variety (at least two different options) of fluid milk. Sponsors must notify ISBE for approval to use this flexibility. Approved waivers are effective from July 1, 2021 through September 30, 2021. Following this date, sponsors can no longer waive milk variety requirements without an approved waiver (refer to the [Nationwide Waiver to Allow Specific School Meal Pattern Flexibility for School Year 2021-2022](#)).

This chart is a simplified version of the meal pattern requirements for the School Nutrition Programs (including the Seamless Summer Option) and Summer Food Service Program. More detailed information regarding nutrition regulations for these programs can be reviewed in the [School Nutrition Programs Administrative Handbook](#) and the [Summer Food Service Program for Children: 2018 Nutrition Guide for Sponsors](#). Questions can be submitted to CNP@isbe.net.