



Food and  
Nutrition  
Service

DATE: September 9, 2021

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Braddock  
Metro Center

SUBJECT: Questions and Answers for Child Nutrition Program Reporting in  
School Year 2021-2022

1320  
Braddock  
Place  
Alexandria  
VA 22314

TO: Regional Directors  
Special Nutrition Programs  
All Regions

State Directors  
Child Nutrition Programs  
All States

<b>Issuing Agency/Office:</b>	FNS/Child Nutrition Programs
<b>Title of Document:</b>	Questions and Answers for Child Nutrition Program Operations in Reporting Seamless Summer Option (SSO) Meals and Snacks in School Year 2021-2022
<b>Document ID:</b>	
<b>Z-RIN:</b>	
<b>Date of Issuance:</b>	September 9, 2021
<b>Replaces:</b>	N/A
<b>Summary:</b>	(1) This memorandum provides clarification on questions related to Child Nutrition Program reporting for School Year 2021-2022, in particular reporting of Seamless Summer Option (SSO) Meals and Snacks associated with the Nationwide Waivers released for School Year 2021-2022. (2) This applies to State agencies administering, and local organizations operating, the Child Nutrition Programs. (3) This document relates to 7 CFR Part 210 <sup>1</sup> .

This memorandum contains questions and answers intended to provide clarification to State and local agencies on Child Nutrition administrative reporting requirements in school year 2021-2022. Topics covered include reporting of National School Lunch Program (NSLP) Seamless Summer Option (SSO) meals and snacks reimbursed at the Summer Food Service Program (SFSP) payment rates, as well as other COVID-19 related reporting issues.

Pursuant to authority in Section 2202(a) of the Families First Coronavirus Response Act (the FFCRA) (P.L. 116-127), as extended by the Continuing Appropriations Act, 2021 and Other Extensions Act (P.L.116-159), and based on the exceptional circumstances of this public health emergency, the Food and Nutrition Service (FNS) has issued several nationwide waivers and flexibilities. The Child Nutrition Program Nationwide Waivers for SY 2021-2022 are available online at <https://www.fns.usda.gov/disaster/pandemic/cn-2021-22-waivers-and-flexibilities>. The nationwide waivers include allowing School Food Authorities (SFAs) to participate in the SSO when school is open during the regular

<sup>1</sup> The burden associated with State agency administration and reporting of Program operations is included in 7 CFR Part 210 National School Lunch Program, OMB Control #0584-0006, expiration date 07/31/2023.

school year in SY 2021-2022 and allowing SSO meals and snacks served to be paid at the higher SFSP rate.

FNS appreciates the continued efforts of State agencies and local Program operators to meet the nutritional needs of children during this challenging time. State agencies are reminded to distribute this memorandum to Program operators immediately. Program operators should direct any questions concerning this guidance to their State agency. State agencies with questions should contact the appropriate FNS Regional Office.

Sincerely,

**Original Signed**

Sarah E. Smith-Holmes  
Director  
Program Monitoring and Operational Support Division  
Child Nutrition Programs

Attachment

## **SEAMLESS SUMMER OPTION REPORTING (SSO)**

- 1. For school food authorities (SFAs) participating in SSO during School Year (SY) 2021-2022, on what date will the higher Summer Food Service Program (SFSP) reimbursement rates become effective?**

The nationwide waivers are effective for all of SY 2021-2022, which began on July 1, 2021. Any SFA participating in SSO under nationwide waiver [\*Child Nutrition Response #86, Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates in School Year 2021-2022\*](#) may receive SFSP reimbursement rates for SSO meals and snacks based on their claims for the months of July 2021 through June 2022. Refer to the 'Reimbursement Rates' section of policy memo [\*SP 15-2021, CACFP 13-2021, SFSP 08-2021, Questions and Answers for Child Nutrition Program Operations in School Year 2021-2022\*](#) for more information.

- 2. Will State agencies be required to distinguish School Breakfast Program (SBP) and National School Lunch Program (NSLP) meals and snacks claimed for reimbursement from SSO meals and snacks claimed for reimbursement?**

Yes. To ensure that SFAs operating SSO under this nationwide waiver receive the correct amount of reimbursement, all State agencies electing to participate in the nationwide waivers [\*Child Nutrition Response #85, Nationwide Waiver to Allow the Seamless Summer Option through School Year 2021-2022\*](#) and [\*Child Nutrition Response #86, Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates in School Year 2021-2022\*](#) **must** distinguish between (i.e., maintain separate counts of) traditional SBP/NSLP meals and snacks and SSO meals and snacks claimed for reimbursement. State agency systems must collect and report separate meal counts because traditional NSLP/SBP meals and snacks will continue to be reimbursed at their regular prescribed rates in SY 2021-2022, while SSO meals and snacks will be reimbursed at the higher SFSP rates. As such, program activity under these respective service options may no longer be aggregated together.

- 3. How will States differentiate breakfasts and lunches claimed under SSO from those claimed under traditional SBP and NSLP for SY 2021-2022?**

State agencies may need to revise their claim forms and payment systems to accommodate waiver-based changes to SFA meal claims for the months of July 2021 through June 2022. State agencies should also work with their SFAs to ensure that meal counts are correctly attributed to either SSO or traditional NSLP/SBP operations throughout this time. This is necessary to ensure correct payments to SFAs under the increased reimbursement rates are being provided for SSO meals, and also to ensure that such counts are reported to USDA separately from meals that are reimbursed at the traditional NSLP/SBP rates.

**4. How will SSO meals and snacks be reported to USDA during SY 2021-2022?**

To ensure that SSO meals and snacks are reimbursed at the correct rate, they must not be included on the standard FNS-10 for SY 2021-2022. Instead, the Food Program Reporting System<sup>2</sup> (FPRS) will contain a separate report dedicated to this purpose, referred to as the FNS-10 SSO. This form is identical to the standard FNS-10, with the exception that some data fields, such as paid and reduced-price meal categories, will be locked. The SSO meals and snacks (both 30-day estimates and 90-day final reports) will be reported separately beginning with the July 2021 report using the added FNS-10 SSO report in FPRS. The FNS-10 SSO became available in FPRS in August 2021.

**5. How will traditional NSLP, SBP and Special Milk Program meals, snacks, and milk be reported to USDA during SY 2021-2022?**

State agencies will continue to submit a monthly report in FPRS using the standard FNS-10 for meals, snacks, and milk claimed by SFAs operating traditional NSLP/SBP and the Special Milk Program. This program activity should not be reported on the FNS-10 SSO.

**6. Will State agencies be expected to submit separate FNS-10 reports in FPRS each month during SY 2021-2022?**

Yes, even if there is no meal count data to report on the standard FNS-10, the report must be submitted in FPRS. FNS anticipates that most or all State agencies will need to submit both the FNS-10 and FNS-10 SSO reports each month due to the likelihood that State agencies will continue to have SFAs operating the Special Milk Program, NSLP/SBP, afterschool snacks and also SSO in SY 2021-2022. State agencies must ensure that claiming systems accommodate accurate payment and reporting of meals, snacks, and milk.

**7. May a State agency report SSO meals using the FNS-418 since those meals are being reimbursed at the SFSP rates in school year 2021-2022?**

No. Although paid at the same rate as SFSP meals for SY 2021-2022, SSO meals and snacks must be claimed and reported separately from SFSP. As specified in question #4, FPRS now contains a distinct FNS-10 SSO report form designed to report SSO meals for SY 2021-2022.

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<sup>2</sup> The burden associated with reporting meal claim data is included in the information collection for the Food Programs Reporting System (FPRS), OMB Control #0584-0594, expiration date 07/31/2023.

**8. Will the FNS-10 SSO form also be used for the October 2021 Part B annual reporting?**

Yes. The data for SSO schools including enrollment will be reported on the separate FNS-10 SSO report in Part B of the form, which is reported annually in October. The data for the other schools and institutions that are participating in the Special Milk Program, SBP, and NSLP will be reported as usual on the standard FNS-10 report form in FPRS.

**9. Will any other reports be required from State agencies to report SSO data?**

Yes. FNS will also implement an accompanying SF-425 report (named “PAN-CN-FFCRA-SSO” in FPRS) to account for the SSO Federal Financial Reporting. The reconciliation process in the Automated Grant Closeout Statement of Accounts for the FNS-10 SSO will be set up in identical fashion to the regular FNS-10 and FNS-777 reports. This means that the FNS-10 SSO earnings (meals \* rates) will be compared to the actual outlays/expenditures reported on the SF-425/PAN-CN-FFCRA-SSO, and the final grant amount will be the lesser of the two. As such, State agencies will continue to report traditional NSLP/SBP financial activity on the FNS-777, exclusive of SSO financial data, which should only be reported on the FNS-425/PAN-CN-FFCRA-SSO.

**10. When reporting SSO meals on the FNS-10 SSO, will FPRS automatically use the SFSP rates? Will this further apply for reconciliation and closing of the Federal Fiscal Year and balancing the Statement of Accounts?**

Yes, the FNS-10 SSO will be programed to use the higher SFSP rates for the “meals \* rates” allowable reimbursement calculation (i.e., “earnings”).

**OTHER CHILD NUTRITION REPORTING**

**11. Are State agencies expected to continue reporting data in the “remarks” fields on the FNS-10, FNS-44, and FNS-418?**

No. Although memorandum [SP02-2021](#), [CACFP02-2021](#), [SFSP02-2021](#) “[Reporting of COVID-19 Public Health Emergency Data for Forms FNS-10, FNS-44, and FNS-418](#)” did request this additional data collection for SY 2020-2021, it was not extended for collection in SY 2021-2022 (i.e., the last collection month for these data is June 2021). While the additional “remarks” field required reporting by States is discontinued at this time, please note that FNS will continue to monitor data reporting needs in the Child Nutrition Programs to ensure they align with operational flexibilities during the public health emergency.

**12. Are SFAs participating in SSO for SY 2021- 2022 required to report data on the FNS-742?**

Yes. All SFAs, including those operating SSO in place of traditional NSLP/SBP under a nationwide waiver, should continue to submit an FNS-742 report for SY 2021-2022. State agencies should similarly be prepared to facilitate this data collection as they would in any other school year.