

Serving School Meals During COVID-19 in SY 2020-21 Q&A

Under the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO)

Below are answers to common questions related to serving school meals during COVID-19 in the school year (SY) 2020-21. These questions and answers are specifically for SFAs operating under the SFSP or SSO during SY 2020-21. If your SFA is operating the National School Lunch Program (NSLP) this fall, please refer to the [Serving School Meals under NSLP During COVID-19 in SY 2020-21 Q&A](#) for that program.

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School Meal Service Options for the 2020-21 School Year through September 30, 2021

1. What options do school food authorities (SFAs) have for providing school meals in SY 2020-21?

On August 31, USDA released [COVID-19: Child Nutrition Response #56](#), which allows the National School Lunch Program Seamless Summer Option (SSO) and Summer Food Service Program (SFSP) to continue operating through December 31, 2020. Per [COVID-19: Child Nutrition Response #59](#), that was extended to June 30, 2021. Under this waiver, SFAs may choose to serve meals through the National School Lunch (NSLP) and School Breakfast Programs (SBP) to students based on eligibility, through the SFSP, or SSO. This waiver does not require SFAs to transition to SFSP or SSO operations. FNS reserves the right to withdraw this approval subject to availability of funding.

The USDA has also extended the area eligibility, non-congregate feeding, meal service time flexibility, and parent/guardian pick up waivers for the SFSP and SSO through September 30, 2021. Therefore, schools who provide in-person learning, virtual or a hybrid education model may serve meals to students in person, through a drive through or delivery option.

Summer Food Service Program (SFSP)

Sponsors (SFAs and non-school organizations) that have a SFSP contract may continue to operate under the SFSP through September 30, 2021. Review the updated [SFSP Requirements and Deadlines for SY2020-21](#) and update the SFSP contract within [FNS Online Services](#) following the specific instructions provided in the [SFSP Application Instructions for SY2020-21](#).

- Ensure that all sites are included in the contract. All drive thru sites require a site application. Mobile Routes may have one site application this year, but details regarding each stop must be provided to DPI (location and times of meal service). Route changes must be communicated to your assigned consultant.
- Continue to provide updates to your local health department/sanitarian when new sites are added to your Program.
- Any SFA operating the SFSP will be placed in claims withholding for the NSLP. An update to the school nutrition contract will be required to delay the program start dates to begin when you transition back to NSLP.

Seamless Summer Option (SSO)

SFAs may elect to operate the SSO through September 30, 2021. Under SSO, all NSLP, SBP and/or Afterschool Snack Program requirements still apply. Meals may be provided at no charge to students at open, restricted open, or closed enrolled sites and are reimbursed at the applicable programs free reimbursement rates. More information can be found on the [SSO webpage](#).

How to participate in SSO through June 30, 2021:

1. Complete the [SSO application](#) for meal service locations in operation. The 2020-21 school year school nutrition contract already includes all SBP, NSLP and Afterschool Program sites and dates of operation. If any program sites change as a result of SSO, [contact the School Nutrition Team](#). If your

agency would like to provide meals through June 30, 2020, please make sure the program end dates in your school nutrition contract reflect that.

National School Lunch Program (NSLP)

SFAs may provide meals to students through the NSLP, SBP and/or Afterschool Snack Program, as usual. All program requirements still apply. Students would be charged and meals claimed based on the student's eligibility status. These sites may not operate as an open site.

Currently the the [non-congregate waiver](#) for the NSLP (including Afterschool Snack Program) and SBP is available through June 30, 2021. The USDA has not extended the non-congregate waiver for NSLP at this time. SFAs operating NSLP have the option to elect the non-congregate waiver for SY 2020-21.

- If your SFA **HAS NOT** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), the SFA is subject to the congregate feeding requirements and would not be able to provide meals under NSLP or SBP to virtual students. By not electing this waiver, you are only feeding students who are attending school in a school building.
- If your SFA **HAS** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), meals must be offered to every enrolled student whether they attend virtually or in-person. Please ensure this waiver is completed to elect the non-congregate feeding waiver.

2. The SFSP and SSO regulations only allow schools with 50% or more of their enrolled students certified as eligible for free and reduced to qualify. Can schools that have less than 50% of their enrolled students certified as free or reduced participate in SSO or SFSP?

Yes. USDA has extended the area eligibility waiver through [COVID-19: Child Nutrition Response #77, Nationwide Waiver to Extend Area Eligibility Waivers – Extension 4](#) and COVID-19: Child Nutrition Response #80, Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in the SFSP and the NSLP Seamless Summer Option – Extension [3](#). Through these nationwide waivers, SFAs have the ability to operate SSO or SFSP in areas that do not meet the >50% free and reduced eligibility requirements for open and closed enrolled sites.

Schools with less than 50% free and reduced must have a plan in place so that meal distribution methods more directly target households of enrolled students who are eligible for free or reduced price meals. Please ensure this is done in a way that does not overtly disclose student eligibility. This area eligibility waiver is effective through September 30, 2021.

3. If our SFA elects to operate SSO or SFSP, is there a requirement to provide meals to children in our community?

SFAs have three options when determining how your SFA will operate the SSO or SFSP.

1. **Open** - all children eat free in communities, age 18 and under. Schools and non-school sites can elect this option. With this option, meals **must** be made available to the community for children 18 and under.
2. **Restricted Open** - sites that meet the open site criteria, explained above, but are later restricted for safety, control, or security reasons. Serves children age 18 and under. Schools and non-school sites can elect this option.

NOTE: An example might be making meals available to other household members (age 18 and under) of enrolled students. Schools could provide meals one day a week at a school or community site and provide a week's worth of meals at once for community participants. This may help schools meet the open requirement but who do not have the ability to do this daily, particularly when students are back in buildings.

3. **Closed Enrolled** - A closed enrolled site is a site that serves only an identified group of children age 18 and under, who are participating in a specific program or activity. Per [USDA Memorandum SP 25-2020, Q#10](#) and [USDA Memorandum SP 01-2021, Q#3](#), a school may opt to be a closed enrolled site through June 30, 2021 and only feed enrolled students. Please note, the closed enrolled option for SSO is only available for the regular school year, per [USDA Memorandum SP 01-2021, Q#3](#), this is not an option during the summer.

4. **If an SFA chooses to operate under SSO or SFSP as closed enrolled, doing only congregate feeding, would they be required to feed virtual students?**

Per [USDA Memorandum SP 25-2020, Q11](#), if an SFA is operating SFSP or SSO at a closed-enrolled site, and providing meals in a congregate setting, they are only required to make meals available to students attending in person. SFAs are encouraged to make meal service available to all enrolled students whenever possible, or direct virtual students to other meal service locations in the community.

5. **If our SFA has been operating under NSLP and would like to transition over to SSO or SFSP, can this be retroactive?**

SFAs that have submitted an SSO application, or SFSP contract, may claim meals under these programs and receive reimbursement at the free rate. The program can be retroactive up to the SFAs ability to make a claim adjustment, which is up to 90 days after the last day of the claiming month. The SFSP contract or SSO application should reflect actual program start dates. It is important to note, that if the program will begin retroactively, any student that paid for their meals, must receive a refund for their meal payments.

6. **Are Residential Child Care Institutions (RCCIs) permitted to elect the SFSP or the SSO?**

Per [USDA Memorandum SP 04-2021 Q10](#), all SFAs, including RCCIs, may have the option to elect SSO or SFSP.

7. **The Nationwide Waiver to Allow SFSP and SSO operations through [June 30, 2021](#) says "FNS reserves the right to withdraw this approval subject to availability of funding." What does this mean?**

The waiver allows the SFSP or SSO to continue with area eligibility waivers through June 30, 2021 if funding is available. If funding is not available, USDA reserves the right to end the program extension at a date earlier than June 30, 2021. If this happens, the DPI will contact SFAs as quickly as possible with the new end date. Also, if this occurs, SFAs will resume meal service under the NSLP and SBP.

8. **If my school operates the SFSP or the SSO through September 30, 2021, which reimbursement rates will be used?**

The current [Summer Food Service Program reimbursement rates](#) are valid January 1, 2020 to December 31, 2020. The SSO rates are the same reimbursement rates received under the [NSLP Reimbursement Rates](#) and are valid July 1, 2020 to June 30, 2021.

9. Can a small school choose to be a distribution site under another SFSP or SSO contract rather than having their own separate SFSP/SSO contract?

Yes, small schools may have their own contract, or work with another local SFA or SFSP sponsor to add their school as a meal distribution site under their SFSP or SSO contract. Contact other SFAs in your area to discuss this option. If you elect this option rather than operating your own program, this will require a school nutrition contract update as your school would have a delayed program start date. Please note, by not claiming meals under your contract during this time, this may have future implications for USDA Foods entitlement, Severe Need Breakfast and possibly area eligibility qualification for afterschool snacks.

If you receive USDA Foods, you will continue to receive the food, but you could divert the deliveries to the school providing meals. Submit a delivery address update through the [USDA Foods Ordering System](#). Your SFA will still be charged administrative, delivery, storage, and processing fees (with no revenue coming in), while the larger school will be using the food and receiving the reimbursement. Consider negotiating the recovery of these fees with the larger local SFA who is serving meals and utilizing your USDA Foods. A [WI USDA Foods Transfer and Donation Documentation form](#) can assist you in thinking through the logistics of managing your inventory.

Continue to run Direct Certification, accept free and reduced meal applications, and conduct verification on your own. Your school will need this data upon return to the NSLP contract.

10. What if we are a small private school in a Joint Agreement with the local public school? Do we still need to be prepared to have lunch open to the public?

It depends on how you elect to operate. All schools operating as an open site must provide free meals to all children 18 and under in the community. If schools have concerns about providing meals to all community children, they may:

- Operate as a closed enrolled site and only feed enrolled students;
- Operate as a 'Restricted Open' site. Under a restricted open site, they could provide meals to the non-enrolled children of their school families only.
- Consider being a meal distribution site under another SSO or SFSP contract. See question #10.

11. Our schools are closed to students/public based on cohort days. We are serving to-go style meals. Staffing our secondary buildings can handle this, but our smaller elementary schools cannot. Are we allowed to still serve as SFSP if we do not do to-go at the smaller sites?

Yes. You may choose the best locations within your district/community to serve virtual students and/or the community meals. Those schools that are primarily serving just students attending in person classes can be classified as restricted open or closed enrolled, due to their inability to staff an open site. The sites open to virtual and/or community children would be considered open.

12. In the SFSP contract there is a "site location" and choices are indoor or outdoor. If we do indoor and outdoor meals, do we have to enter the site twice-one as indoor and one as outdoor?

No, there should be only one site application for each address where meals are served. Indicate that you are serving indoors on the site application. Below that question there is a text box to describe how the meals will be supervised. You can use that text box to indicate that you also provided meals outside.

Meal Pattern (SSO and SFSP using the NSLP and SBP meal patterns)

13. What meal pattern must be followed for SSO and SFSP?

SFAs operating under the SSO will continue to follow the NSLP, SBP and Afterschool Snack Program meal patterns, as applicable. SFAs operating the SFSP may choose to follow the NSLP and SBP meal patterns for breakfast and lunch OR the [SFSP meal pattern](#). Select the meal pattern that your SFA will be following on the SFSP Site Application(s). SFAs operating the SFSP and continuing to provide Afterschool Snacks must follow the NSLP Afterschool Snack Program meal pattern. Non-school SFSP sponsors must follow the [SFSP meal pattern](#).

14. If we are only feeding 2-3 days a week, how would that impact the vegetable subgroups?

SFAs are still expected to serve a variety of vegetable subgroups to students. When schools experience shortened 3- or 4-day weeks due to holidays, the weekly requirements are not adjusted by 20% or 40%, respectively. Rather, the amount of “Additional” vegetables served can be adjusted. An example of a 3-day week is below.

3 Day School Week	Elem/Middle (K-8)	High School (9-12)
Weekly Vegetable Total	2 ¼ cups	3 cups
Dark Green	½ cup	½ cup
Red/Orange	½ cup	1 cup
Legumes	½ cup	½ cup
Starchy	½ cup	½ cup
Other	¼ cup	½ cup

Additional short and long week meal patterns, including vegetable subgroup requirements, are available on the [USDA’s Food and Nutrition Service](#) website.

15. How do we offer the vegetable subgroups if students come to school with an A/B schedule?

The intent of the vegetable subgroups for the lunch meal pattern is to ensure all students are offered a variety of vegetables over the course of the week. If students are grouped into an A/B schedule by weeks, the meal pattern must be followed as normal. If the A/B schedule is by day, (e.g. Monday and Tuesday group A is onsite, and Thursday and Friday group B is onsite, with all non-onsite days attended virtually) the meal pattern would still need to be followed, however the menu planner can create menus that are best served in the model being used each day. Please refer to the [Menu Planning for Multiple Attendance Options](#) document for additional details and menu planning examples.

16. How do we stay within the dietary specifications (sodium, calories, saturated fat) for more pre-packaged meals due to COVID-19?

Pre-packaged meals tend to have more processed items such as deli meat and cheese, which contain higher amounts of sodium. Balancing these food items with fresh produce or low-sodium canned vegetables may assist in meeting the dietary specifications. Reading and comparing labels/nutrients prior to purchasing these products will also help make better choices for meeting average daily dietary specifications.

17. **We have been notified of the vacated 2018 Final Rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements, resulting in the return to the requirements of the 2012 final rule (i.e. flavored milk may be only skim; all grains served in the NSLP and SBP must be whole grain-rich; and school lunches and breakfasts offered through the NSLP and SBP must meet [Target 2 weekly sodium levels](#)). What if we cannot meet these requirements right away for the school year 2020-2021?**

SFAs may submit a [meal pattern flexibility request](#) to apply for this waiver. It is understood that procurement for SY 2020-21 was underway when this decision and announcement were made. Therefore, use of the nationwide meal pattern flexibility waiver is allowable if the 2012 requirements cannot be met for this school year.

18. **Are there any meal pattern flexibilities available, such as milk variety and vegetable subgroups?**

The [COVID-19: Child Nutrition Response #63, Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - Extension 8](#) allows SFAs and sponsoring agencies the ability to ask for flexibility to serve meals that do not meet the meal pattern requirements. This includes the requirement that SFAs must offer students a variety of at least two different options of fluid milk at breakfast and lunch.

SFAs and sponsoring agencies can continue to request flexibilities for meal pattern requirements. Flexibilities must be approved by a member of the SNT. [Meal pattern waiver flexibility requests](#) are approved on a case-by-case basis. Justifications that may be approved include: procurement/availability issues, unresolvable food safety concerns, difficulty meeting the Target 2 sodium level, providing required milk types or a variety of milk, or serving 100% whole grain-rich requirements for SY 2020-21, and minimizing potential exposure to COVID-19 while supporting nutritious meals. Requests will not be approved due to preference, student acceptance, and waste. Additionally, requests for service of milk with higher milk fat will not be approved. If new food component disruptions occur, additional waiver requests must be submitted.

Agencies must resume normal meal pattern requirements as soon as products become available. Keep in mind it is always best practice to provide children with a variety of healthy options that align as closely as possible with the meal pattern requirements. Approved waivers are valid through June 30, 2021 after which all meal pattern requirements are reinstated.

19. **What if we are unable to procure allowable milk or no milk at all?**

The [COVID-19: Child Nutrition Response #63, Nationwide Waiver to Allow Meal Pattern Flexibility in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - Extension 8](#) allows the DPI to grant meal pattern flexibility waivers, including the milk component, to SFSP and SSO programs experiencing difficulties. These difficulties include procurement/availability, unresolvable food safety concerns, providing a variety of milk (does not apply to SFSP meal pattern), and minimizing potential exposure to COVID-19 while supporting nutritious meals. If you are participating in one of these programs and currently experiencing a difficulty procuring and serving the milk component per meal pattern requirements, a [meal pattern flexibility request](#) may be completed. Note that serving milk with

a higher than 1% milk fat is not allowed in meal pattern regulations and the meal pattern flexibility waiver does not change this requirement. Therefore, requests for service of milk with higher milk fat will not be approved. This only applies to SFAs following the NSLP and/or SBP meal patterns.

Agencies must resume serving the normal milk meal pattern requirements as soon as products become available. Approved waivers are valid until June 30, 2021 after which time all meal pattern requirements are reinstated.

20. If we need to provide meals to virtual students, do we also have to follow all of the vegetable subgroups for packed lunches?

Yes, vegetable subgroups must be followed for the appropriate age/grade group. However, if there is a targeted and justified need to alter the subgroups to help support access to nutritious meals while minimizing potential exposure to COVID-19, an SFA may submit a [meal pattern flexibility request](#).

21. Can we serve all age/grade groups one meal pattern?

Yes. The nationwide meal pattern flexibility waiver allows one meal pattern to be served to all age/grade groups virtually and on-site, when justified based on plans to support access to nutritious meals while minimizing potential exposure to COVID-19. SFAs may submit a [meal pattern flexibility request](#) to apply for this waiver.

When possible, schools are encouraged to use the overlap between the requirements in different age/grade groups to offer a single menu to multiple grade groups without the use of the meal pattern waiver. For example, schools may offer the same breakfast menu to all children in grades K-12. Likewise, schools may offer the same lunch menu to all children in grades K-8. If an SFA requests to serve the K-8 meal pattern to all K-12 students, it is encouraged to provide extra food to grade 9-12 students, like an extra piece of fruit. An SFA may also request to serve the 9-12 meal pattern to all K-12 students. Schools may include preschool students in their one meal pattern waiver requests.

22. Can different age/grade groups pick up meals at one time if we follow the appropriate meal patterns? And if a parent picks up the meal(s) for multiple students at home in different age/grade groups, how do we know that a K-5 student or a 9-12 student is getting the proper meal as packaged at home?

Yes. Multiple age/grade groups can pick up their meal(s) at the same time. SFAs must provide meals to students based on their age/grade group unless a waiver has been submitted by an SFA and approved by a member of the SNT. Consider labeling meals for pick-up based on this information (e.g. elementary, middle, high school) or including a daily menu with serving sizes, so students receive the appropriate amount of food.

23. Can a parent pick up meals for all their students at one building? If yes, do they have to give meals following the meal pattern for the student or can they follow the meal pattern of the school?

The [COVID-19: Child Nutrition Response #62, Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children—Extension 5](#) allows parents and guardians to pick up meals for all their children. The school district may configure the meal service that best suits its student population. However, meals **must meet** the meal pattern requirements for each age/grade group, and the district must ensure that children receive reimbursable meals that align with their age/grade group (i.e. meal pattern) unless the SFA has

received approval for a meal pattern flexibility waiver. SFAs may submit a [meal pattern flexibility request](#) to serve one meal pattern to all age/grade groups at lunch.

24. What about 3K and 4K students that are usually co-mingled, but will now be served in the classroom this year? What meal pattern do we follow? (updated 3/8/21)

When 3K and 4K students are served in the classroom, they are not co-mingled. Therefore, they must be served the [infant and preschool meal pattern](#) unless they have an approved [meal pattern flexibility request](#) that allows one meal pattern for all age/grade groups. Please note that meal pattern flexibility waiver may only be used for **school-run** child care centers. Privately run daycares located within schools must continue to follow the infant and preschool meal pattern, regardless of if the daycare students are co-mingled with older age groups due to licensing requirements.

25. The SFSP and SSO programs have established time frames for serving breakfast and lunch. Can this requirement be waived?

Yes. The [COVID-19: Child Nutrition Response #66, Nationwide Waiver of Meal Service Time Restrictions in the Summer Food Service Program and the National School Lunch Program Seamless Summer Option - EXTENSION 2](#) removes 1) required minimum elapsed time between meal services and maximum durations of individual meals services in the SFSP and 2) parameters on the timing of lunches and breakfasts under the NSLP and SBP for the SSO.

Therefore, SFAs and sponsoring agencies can serve meals when it is most convenient for households. Multiple days' worth of meals may be served all together, lunch served with breakfast for the next day or any other combination.

SFAs may complete a [meal service time flexibility](#). Approved waivers are valid until June 30, 2021.

26. Can the SFA package and distribute frozen food items (e.g. precooked chicken nuggets) for families to heat at home as part of the reimbursable meals?

Yes, as long as specific measures are taken. These food items must meet the applicable NSLP/SBP (i.e. SSO) meal pattern requirements in order to be served as part of the reimbursable meal. Additionally, SFAs should ensure that these types of food items are distributed with clear cooking instructions for the household to follow, including directions to heat the food to an internal temperature of 165 degrees F before consuming. For frozen items, the SFA should also communicate safe storage guidelines if the foods will not be prepared and eaten immediately. Safe storage guidelines for items intended to be heated at home should advise that the foods be held at 41 degrees F or below (or kept frozen, if applicable) until used. SFAs should consider the kitchen equipment and food preparation requirements involved in the meals provided, as households may be limited. Please reference the [USDA Memorandum SP 13-2020](#) for further guidance.

If SFAs choose to include frozen food items in the meals, items should be labeled as "fully cooked," "precooked," or "ready-to-eat" on the manufacturer's packaging. SFAs should not distribute any raw animal-based time/temperature control for safety (TCS) food items, such as raw chicken, raw eggs, raw beef, etc. There are many frozen [State Processed Products](#) available that could be incorporated into reimbursable meals.

If you are unsure if a frozen item may be considered "fully cooked," "precooked," or "ready-to-eat," please contact your local regulatory authority and/or sanitarian to discuss your specific question and obtain additional guidance. If you have questions about a state processed product on the list above, please contact a [DPI USDA Foods team member](#).

27. Can the SFA package and distribute shelf-stable foods (e.g. dry pasta, dry beans, etc.) that need to be cooked at home as part of the reimbursable meals?

While there are minimal food safety concerns with providing these types of food items, there are other important considerations. Program operators must consider how these types of dry items may credit in the NSLP/SBP meal pattern when cooked. Further, the [USDA Memorandum SP 13-2020](#) advises that program operators should:

- Consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

28. It is becoming difficult for my agency to source disposable, portion-controlled food storage containers, like clamshells. What other options do I have to package meals?

SFAs may have to adapt and utilize alternative food storage containers not typically used or procured. Suggestions include, but are not limited to: aluminum foil, portion cups with lids, paper boats with plastic wrap, wax paper to wrap a sandwich, ziploc bags, styrofoam cups with lids, or even banana leaves. Banana leaves are available frozen at most grocery stores.

29. If we are in a joint agreement, do we still need to complete the Meal Pattern Flexibility Waiver?

Yes. SFAs need to know/understand what meals are served to their students. Therefore, they need to be responsible for filling out the form AND receiving approval from DPI. Each separate SFA must have a waiver, so the SFA providing the meals should work with the joint schools to get the waiver submitted.

Offer versus Serve (OVS)

30. Is OVS allowed under SSO or SFSP?

Yes, OVS is allowed, but not required, under the SSO and SFSP programs. If a site chooses to do OVS for lunch and/or breakfast, it would follow the normal requirements in the [OVS manual](#) and would apply regardless of the ages of children served. Therefore, no high school OVS waiver needs to be completed when operating SSO or SFSP. OVS is designed for congregate feeding and, if used in a non-congregate setting, must be done so with thoughtful planning and consideration. The conditions under which sponsors are operating and their ability to follow appropriate safety measures in providing meals are factors to consider. For both programs, OVS is not intended to be a way to circumvent meal pattern requirements, or eliminate specific components.

31. Can we implement OVS with a pre-ordering system? Or does it need to be at the point of sale? Are we allowed to offer two meal choices within the OVS pre-ordering system?

Yes, it is allowable to implement OVS with a pre-ordering system. According to the [OVS Manual](#), there is no requirement that the student must be able to make their OVS selections on a serving line. Therefore, the choice given to the student or parent(s) during the pre-ordering process is allowable. Be aware that the structuring of the meals based on student selections must be carefully checked to ensure provided meals are reimbursable. Also, you may offer two different meal choices within the pre-ordering system. Each meal,

no matter the entree choice, must offer all five food components in their appropriate portion sizes for lunch and all four food items in their appropriate portion sizes for breakfast.

- 32. When putting a breakfast and lunch meal together in a bag (for parent pickup), can the bag contain a reimbursable meal using OVS (e.g. cereal, milk, juice for breakfast, and pizza, marinara cup, milk for lunch) or must all the items be put in every bag (each meal as a unit)?**

In order to use OVS for pre-packaged meals, students must have the ability to choose which menu items to decline. This could be done through a pre-ordering system, which allows students to select what they want, or during the distribution process, where students can make at the time of meal pick up.

- 33. How do we handle Special Dietary Needs for students to make sure we have the correct allergy or texture modified meal available during virtual distribution of meals?**

SFAs must accommodate special dietary requests that are signed by an authorized medical professional, including distributed meals for virtual-learning students. Since meal modifications can be costly, schools may want to consider asking families to pre-order meals and alert staff when picking up meals. Schools should take the necessary precautions for safe storage and prevent cross-contamination. Label meals so they are easily recognizable to staff and families. SFAs may want to evaluate their Special Dietary Needs policy especially if choosing to accommodate requests without a medical statement using OVS.

Please note, all meals claimed for federal reimbursement must meet requirements for special dietary needs, which includes non-enrolled students served in open or restricted-open sites. Work with parents on getting the appropriate medical statement for any meal accommodations that are made outside of a reimbursable meal.

- 34. If not implementing OVS and just doing serve, how do we compensate for allergies?**

When not implementing OVS, SFAs must serve all five components in their full planned portion sizes at lunch. If a student has a dietary need supported by a signed medical statement from a licensed medical practitioner, that student does not have to be served the planned menu for the day and does not need to be served all five components. Whatever is written on the medical statement becomes that student's reimbursable meal.

If a student has a dietary need that is not supported by a signed medical statement (e.g., a note from a parent), the student must still be served a reimbursable meal. If not using OVS, then the student needs to be served all five components, but substitutions could still be made as long as the meal still meets meal pattern requirements. For example, if a student has a note from a parent saying that their child is lactose intolerant, the child could be offered lactose-free milk instead of cow's milk along with the other four components of the meal.

- 35. How will OVS work for pre-packaged, bundled meals in the classroom?**

According to the [OVS Manual](#), "if a school participates in OVS at breakfast where some or all of the components are bundled together, the operator should attempt to the extent possible to offer choices (such as a fruit basket) aside from the pre-bagged items. However, there is no requirement that all possible combinations of choices be made available to the student."

“Pre-packaged meals are allowed at all age/grade levels. Schools are encouraged to have some food components/food items with choices and/or the option to decline, such as fruit or milk. If these meals are offered as part of breakfast in the classroom, field trips, or for students leaving the campus for work study, OVS is not required, even at the senior high level.”

This flexibility should not be used to address food safety issues (i.e. transporting milk).

36. What are NSLP menu/signage display requirements in scenarios where SFAs are providing non-cafeteria meal service in classrooms and remote pick-up locations? Do menus need to be displayed at all if meal options are pre-plated/bagged?

Due to various COVID-19 response meal service scenarios, USDA acknowledges that posting menus at or near the beginning of serving lines may not be possible. To meet this requirement in the current circumstances, menus may be displayed at alternate locations, such as on a cart, at the pick-up location for take home meals, or online. Menus may also be posted on the school doors or in a prominent location in the school. This is applicable when meals are pre-bagged/plated. Furthermore, schools are not required to include signage at the alternate feeding locations as long as “other methods” are used to help students identify a reimbursable meal. Example: a message that states: today’s meal includes milk, meat or meat alternate, vegetable, fruit, and grain.

To assist schools, SNT has OVS and no OVS signage, available to print on our [signage webpage](#).

Counting and Claiming under SFSP and SSO

37. How are meals claimed under the SFSP or SSO?

- All children ages 18 and under can eat free and are claimed at the free rate for both programs.
- SFAs may claim up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. This is a SFA decision and reflected in the SFSP contract or SSO waiver.
- Each breakfast and lunch and snack provided must be separately counted and claimed by site.
- Meals are claimed at the site where meals are provided. If an SSO meal service site is at a nonschool location, claim the meals at the school that the meal service location is within the attendance area of. SFSP sponsors must include all school and nonschool sites within their SFSP contract and claim under the appropriate site. Mobile routes may be entered as one site as long details regarding the ‘stops’ are provided.
- Meals can be claimed every day, including weekends and planned school breaks/holidays.
- Separate meal counts and records must be maintained for meals served under a COVID-19 waiver.
- Meals may be counted on the day distributed, but must be claimed for the day the meal is intended to be consumed. This is especially important when a week crosses months.

SFSP: Meals will be claimed online under the SFSP claiming process. It will be done on a monthly basis. Do not submit combined claims. Do not check ‘final claim’ on any claim this year. View the [SFSP claim instructions](#).

SSO: Meals are claimed under the National School Lunch, School Breakfast and Afterschool Snack claiming portals, as applicable. There is no separate claiming portal for SSO. Please refer to the [COVID-19 Seamless Summer Option Claim Manual](#) for specific instructions for submitting claims.

38. Do meals need to be tracked by student name, or is a total meal count acceptable for SSO and SFSP?

Meal count sheets may be used to collect total meals served by program while operating SSO or SFSP. Student names are not required to be collected. Sample meal count sheets are available on the [SSO webpage](#) and [SFSP Materials and Resource](#) webpage.

To maintain program integrity, SFAs are encouraged to continue using their point of service software, if able to do so safely in regards to COVID, which may ensure duplicate meals are not claimed. For meals that are served through a drive through, please post the Parent Pick Up State Policy sign that can be found on the [Child Nutrition Program COVID-19 Information webpage](#) under the Guidance and Memos drop down.

39. Our SFA has three schools located in one building. Do meals need to be claimed by the site the student is enrolled, or can we select one site to claim all meals?

When students are attending school in person, follow your school nutrition contract and claim students by the school in which they are enrolled. This would require separate counts by school.

For meals that are served to virtual students or children in the community ages 18 and under, claim those meals at the site the meals are provided; student enrollment does not need to be collected. In this case, the SFA could choose which school to claim these meals.

40. Can SFAs serve all virtual/e-learning students and the community out of one location or from a location that is not where they would typically be attending?

Yes. SFAs may choose to serve meals to virtual students and the community from the locations that best meet the needs of families. Sites not serving the community are considered restricted open sites. Sites serving all are considered open sites. SFAs must continue to have a plan for maintaining program integrity and accountability for the meals they are serving.

41. Our school distributes multiple meals at a time to students/parents/guardians. How are these meals claimed? Do I claim them on the date they were distributed or on the date they were planned to be consumed?

Meals must be claimed on the date they are planned to be consumed. This new [Multiple Meal Distribution Form](#) will assist you in tracking meals for correct claiming.

42. Can meals only be provided to the households eligible for free or reduced price meals?

No, the SFSP and SSO program requirements are for meals to be available for all children 18 and under, not just students that qualify for free or reduced. Students with special needs can qualify up to age 21. This includes virtual students. Schools located in areas that are less than 50% free and reduced should target students who qualify for free and reduced, but meals are available for all.

43. May meals be provided to siblings who may not be in school or who do not attend school?

Yes, if the site is approved to operate under the SFSP or SSO program and operates as an open site, all children age 18 and under in that household may be served and claimed at the free rate.

44. May parents or guardians pick up meals for their children, without the children being present?

Yes. The COVID-19 Child Nutrition Response #76, Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children - Extension 6 extends the requirements for SSO or SFSP through September 30, 2021. The USDA Food and Nutrition Service (FNS) recognizes that in this public health emergency, continuing to require children to come to the meal site to pick up meals may not be practical and in keeping with the goal of providing meals while also taking appropriate safety measures. Under this waiver, Program operators providing meals in a non-congregate manner may distribute meals to a parent or guardian to take home to their children. State agencies must have a plan for ensuring that Program operators are able to maintain accountability and program integrity.

The WI state plan for ensuring accountability and program integrity includes the following:

- **Maintain Accountability and Integrity:** The meals are to be provided to eligible children (18 years and under). Parents/Guardians are to share the school name where each child attends that they are requesting meals for, if the children are of school age.
- **Communication:** Post signage and update any existing communication (i.e. emails, web posting, social media) to include this information. The Parent Pick Up State Policy sign can be found on the [Child Nutrition Program COVID-19 Information webpage](#) under the Guidance and Memos drop down.

45. Can we serve parents and other adults in the community if they pay for the meal?

If the SFA or SFSP sponsor has the capacity to provide meals to adults, they may do so but will not be reimbursed for those meals. Adults must either pay for their meals or if you elect not to charge adults, other non-school food service funding must be used to pay for those meals.

46. Can we provide multiple days' worth of meals at once to households?

Yes. You may provide meals for up to one week for households at a time. Food may be provided in a "bulk" manner if a menu is provided, which includes the specific items that were planned and prepared for specific meals. Any further preparation, food safety or portion size instructions should also be included to ensure households know what was provided for each meal. For example, a grocery bag may include all the meal components for breakfast and lunch for a 5-day period, along with the menu and instructions for households.

Considerations with serving bulk include: meals should be unitized (i.e. all components provided together – no offer versus serve), which could amount to quite a bit of food if there are multiple children in a family; shelf-stable items could provide ease; if milk or other items must be refrigerated, some families may not have the space to store all of that properly; and provide the option as to how many meals families may want to take the day you serve, just in case space/storage is an issue.

47. Can meals be served over planned holidays such as Labor day, Thanksgiving or winter break under SSO or SFSP? If we choose to continue meal service during this planned break or holiday, can we claim those meals?

Meals may be provided for planned holidays and vacation breaks. These meals can be claimed for reimbursement under SSO, SFSP, and approved sites under the Child and Adult Care Food Program (CACFP) At-risk afterschool meal program, if the SFA chooses to do so.

48. Can meals be delivered to a student's home?

Yes, if the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes. Per the [USDA COVID-19 SFSP and SSO Meal Delivery Q&A](#), schools must first obtain written consent from households of eligible children (this could include email or other electronic means) that the household wants to receive delivered meals. Delivery could be completed by mail or delivery service, or hand-

delivered by school staff, volunteers, community organizations, or others. Meals may be delivered for all students regardless of eligibility. With that being said, meal distribution methods do need to more directly target households of enrolled students who are eligible for free or reduced price meals. Please ensure this is done in a way that does not overtly disclose student eligibility.

There is no additional reimbursement for home delivery or mobile meals delivery, but related expenses, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO. Delivery costs could also be paid with non-program funds such as State or local funds, or private donations.

49. If a student brings a cold lunch is milk free during the SSO/SFSP meal service or do we still charge the milk as an ala carte item, like we usually do?

The student may receive a free reimbursable meal under SSO or SFSP, but any non-program food items are charged to the student as a la carte. The student with a cold lunch would be charged for the milk, but could receive the meal for free.

50. What if we close for two weeks due to an outbreak of COVID-19 and come back?

If students were in the building for instruction and the building had to close for two weeks due to an outbreak of COVID-19, and students are now doing virtual learning, meals should continue to be served through the SSO or SFSP. USDA has provided nationwide non-congregate meal and meal time flexibility, and parent/guardian pick up waivers to allow for students to continue to be fed.

51. Are we required to serve meals to students who are in quarantine because they were exposed at school? We don't normally serve meals to sick kids, why would we have to now?

SFAs that are providing meals for virtual students do not need to feed a student that is 'absent' due to COVID-19 or quarantine. However, if the SFA elected the Non-congregate feeding waiver, the SFA should continue to provide meals for students in quarantine that are still 'attending' school and doing virtual learning. SFAs are not required to deliver the meal and may want to consider special precautions when distributing meals to families in quarantine.

52. What if the entire School Food Service Department must quarantine? How should meals be provided?

SFAs are encouraged to be prepared for a possible COVID-19 outbreak that would affect the ability of your school food service staff to provide meals to students. The SNT has already been made aware of several instances where the entire school food service staff was quarantined due to COVID-19. During these times, we encourage SFAs to do everything possible to continue to make meals available for students. Consider having meals provided by another area SFA, restaurant, vendor/caterer, or hospital. Having a plan and/or agreement in place will allow for a quick response, if needed. As a reminder, meals must meet the meal pattern requirements to be reimbursable and the meal pattern waiver is available if necessary. This is essentially a way of having a continuation of operations plan (COOP). Having back-up meal options available is critical during these times.

- **For Seamless Summer Option:** To enter into an agreement with an emergency meals vendor, complete the weekend [Wisconsin Template Vended Meals Agreement](#) and obtain a copy of the vendor's state restaurant or processing plant license and have it ready until you need to execute it. Contact the [DPI Procurement Contract Specialists](#) if you have any questions.
- **For Summer Food Service Program:** Sample Vendor Agreements are located on the [SFSP Materials & Resources](#) page.

- 53. On the days students are in school, can we send a cold, pre-packed meal home with them for virtual learning the next day? Are we allowed to send multiple meals?**

Yes. The [COVID-19 Child Nutrition Response #78, Nationwide Waiver of Meal Service Time Restrictions in the SFSP and the NSLP Seamless Summer Option – Extension 3](#) allows SFAs to send home multiple cold, pre-packed meals for virtual learning days. Meals sent home must be claimed on the days the meals are anticipated to be eaten.

- 54. Will we be able to continue providing weekend meals to students?**

Meals may continue to be provided to students on weekends under SFSP, SSO, and at approved CACFP at-risk afterschool sites. If an SFA participating in SSO elects to do this, please indicate this on the SSO application. If participating in the SFSP, be sure to check Saturday and Sunday, in addition to the other days of the week on the session page of the site application.

- 55. If we serve meals to virtual students, can we put the breakfast and lunch together in the same bag or do we have to have the amount of time in between meals?**

[COVID-19 Child Nutrition Response #78, Nationwide Waiver of Meal Service Time Restrictions in the SFSP and the NSLP Seamless Summer Option – Extension](#) allows multiple meals to be served at one time. Under normal circumstances, meals must follow meal service time requirements, which states that lunch service must be offered between 10am and 2pm. However, FNS recognizes that due to the COVID-19 public health emergency, waiving the meal service time requirements will support safe access to nutritious meals. Please keep in mind that families cannot be made to take a meal they do not want. For example, if they only want lunch and not breakfast even though they are packaged together, they must be allowed to refuse one, if needed.

- 56. Can we charge students for a meal when they order online?**

An online pre-ordering system is a great way to assist in the production of meals; however, meals cannot be counted and claimed until provided to the student. If families pre-order meals and do not pick up the meals, those meals cannot be claimed for reimbursement.

- 57. We will be distributing one lunch and one breakfast for the next day, but are only able to run lunch through the POS at time of distribution. Can we use our lunch count (which will be by student and school) for our breakfast count?**

Schools must have separate count sheets for breakfast and lunch. Since students cannot be made to take meals they do not want, they can decline the breakfast or the lunch portion of the meal. Therefore, the count could be different for breakfast and lunch.

- 58. A school sends home five breakfasts and five lunches on a Monday and a student is marked 'absent' on Wednesday because they are sick. Would the school still be able to claim the meals for that Wednesday since they were already given to the child? If we are sending home meals Wednesday through Friday for virtual students and there is a weather closure on Friday (for example) can we still claim the meals for Friday even though school was cancelled?**

Yes. When a district provides meals for future days, the intent is the student will be learning/in attendance virtually/remotely. In good faith the food service worker provides those meals (this is the point of service) and the meals are claimed on the day the meal is intended to be eaten. We believe accountability for the meal is at the point of service and stops there.

- 59. Can meals be provided and claimed for days that are not considered instructional days? Such as cleaning days or if the school has scheduled instruction for M-Th and students have Friday off, can meals be provided and claimed on the non-instructional days?**

Yes, when operating under SSO and SFSP, meals may be claimed any day of the week and is not dependent on whether there is formal instruction occurring. This is not allowed under NSLP.

- 60. There are multiple schools and organizations in my community serving meals under SSO and/or SFSP. How do we avoid serving the same families?**

Maintaining integrity is very important. It is essential that all schools/organizations work together to avoid duplication of services. Communicate clearly with families of enrolled students and the public where and when meals may be picked up. If multiple SFAs within the community are participating, best practice would be to have families go to the school their children are enrolled in to receive meals for virtual students and their siblings. The group of schools/community organizations may wish to designate only specific locations to serve other community children (i.e. children not yet enrolled in school).

- 61. Are SFAs required to provide meals on snow days? What if there is virtual learning occurring on a snow day?**

It is not required to provide meals on snow days, even if virtual learning is occurring on the snow day. When the weather is poor enough to warrant a snow day, it may be unsafe for school food service staff to commute to work and for parents/students to pick up meals. However, if weather forecasts suggest a snow day may occur, SFAs that are serving non-congregate meals could provide meals ahead of time with the intention of students eating them on the potential snow day—this would be a best practice.

Please note, schools that have not elected to provide non-congregate meals could not provide meals on a snow day when students are not attending school in-person. Additionally, schools participating in NSLP/SBP may not claim meals that are served on non-instructional days, such as snow days without virtual learning.

Other Programs

- 62. Can SFAs who are participating in SSO or SFSP (providing breakfast and lunch), also provide a snack under NSLP Afterschool Snack Program?**

Schools have the option of participating in the USDA Afterschool Snack Program. If a school elects to operate the program, all students enrolled in the school must have the ability to participate, both in-person and students learning virtually.

SSO or SFSP allow up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. Per [USDA Memorandum SP 01-2021 Q7](#), if breakfast and lunch are served under SFSP or SSO, the snack could be claimed under NSLP. This would allow an SFA the ability to claim either SSO or SFSP and Afterschool Snack on the same day. If the school(s) providing meals does not currently have the Afterschool Snack Program indicated on their NSLP contract, an update will be required. Contact the [School Nutrition Team](#) for more information.

Per [USDA Memorandum SP 24-2020 Q18](#), there is no waiver for the enrichment activity for virtual Afterschool Snack Programs. SFAs must provide an education or enrichment activity for each day the snack is provided. Enrichment activities may be offered in a virtual manner. For example, programs may offer online homework assistance, activity packets, electronic games and books, or other e-learning activities for the participants to complete at home. Team Nutrition offers a variety of online games, books, and nutrition education activities: [Digital Nutrition Resources](#). The Afterschool Snack must continue to follow the meal pattern requirements and may only be provided and claimed for students in the Afterschool Snack Program.

Refer to the [CACFP section](#) of this Q&A for information on serving a snack and/or supper through the CACFP At-Risk Afterschool meals program.

63. How is the Afterschool Snack Program claimed when claimed under NSLP, through September 30, 2021?

The SFSP/SSO area eligibility waiver does not apply to the Afterschool Snack Program when claiming under NSLP. Therefore:

- The Afterschool Snack Program must be included on the School Nutrition Contract, for the site providing the snacks;
- The [Afterschool Snack Program meal pattern](#) must be followed for the snack to be reimbursable;
- Based on the School Nutrition Contract, sites are approved as either area eligible (>50% free/reduced), or non-area eligible (<50% free/reduced).
 - SSO or SFSP meal service sites that are approved as area eligible may claim all snacks that are distributed from that site in the free category;
 - SSO or SFSP meal service sites that are not area eligible, may claim snacks distributed from that site by the participating student's eligibility*, or if student eligibility is unknown (such as an open site), all snacks are claimed as paid.

*It is critical that schools protect the confidentiality of students' meal eligibility information. Please ensure processes prevent overt identification of student meal eligibility.

64. Are SFAs allowed to distribute Afterschool snacks to in-person students as they leave for the day if they all have a virtual enrichment activity available to them when they get home? Are the virtual activities limited to the virtual students or can all students (in-person, hybrid, and virtual) participate in a virtual enrichment activity?

Yes, snacks may be distributed to in-person students as they leave for the day if a virtual enrichment activity is provided and the SFA has elected to use Nationwide Waiver #33. Per [USDA Memorandum SP 24-2020](#), enrichment activities may be conducted virtually or in other non-congregate ways. Offering a virtual enrichment activity to all students (virtual, or in-person) would comply with the requirement to provide an education or enrichment activity.

65. For CACFP At-risk Afterschool Programs and NSLP Afterschool Snacks, if the educational or enrichment activity is electronic and a child does not have access to the required electronic device, is the activity still considered available to all? (USDA Memorandum SP 04-2021, Q3)

As program operators begin to plan enrichment activities for participating children, FNS encourages them to consider the ability of children to access various activities. It may be appropriate to offer some activities that children could participate in without internet access or electronic devices, such as books, activity packets, or coloring sheets.

USDA Team Nutrition offers a variety of games, books, and nutrition education activities for children through the [Digital Nutrition Resources for Kids webpage](#). Although children are not required to participate in or complete an activity in order to receive an afterschool meal or snack, whatever activities are offered should include options that are accessible to all participating children.

66. Can the Wisconsin School Day Milk Program (WSDMP) be operated with SFSP, SSO or NSLP through June 30, 2021?

Yes. This is a state program and it may continue to be operated with either SFSP, SSO or NSLP. To operate this program, this program must be indicated on the school meal program contract as in program. All WSDMP program requirements still apply.

67. Does the WSDMP fall under any of the Federal waivers? Do all students get free milk if I'm operating SSO or SFSP?

No. The WSDMP is a state-funded program regulated by State statute, not USDA. The WSDMP program regulations still apply and only students in preschool through fifth grade who qualify for free or reduced price meals may receive milk at no charge. Students that do not qualify are still charged for their milk.

68. Does the WSDMP have to be served to virtual students?

For SY 2020-21, SFAs are allowed to serve milk to students under the WSDMP in a non-congregate manner, at a time that works for the SFA and households (depending on learning model), and parent/guardian pick-up is allowed. All other requirements of this program remain in effect. For more information, check out the [WSDMP webpage](#).

State statute requires milk to be served each day school is in session for eligible students. There is flexibility offered to SFAs who cannot meet this requirement when students are learning virtually. How SFAs apply for this flexibility is dependent on whether your SFA is public or private.

Proposed Plan (private schools only): Private SFAs must provide the DPI SNT with a [proposed plan](#) of how they will be serving the WSDMP this year. If students are not in school buildings, this plan lets the DPI SNT know to which students you will be serving milk. You can claim only for the milk that was served depending on the specified plan and whether or not school was considered "in session" if students were not in the building.

Waiver (public schools only): Public SFAs may now request a [waiver](#) of WSDMP state statutes that require milk to be served every day. If students are not in school buildings, this waiver allows you to not have to serve milk. However, if you do serve milk during the school year (either in the building or when students are in virtual learning), you can claim for that milk even if you did not serve every day school was in session. Please note, since WSDMP is under state statute, before requesting a waiver, the school board needs to hold a public hearing in the school district on the request.

69. Do students that do not qualify for free or reduced lunch get free milk under the WSDMP if we are operating under SSO or SFSP?

The WSDMP is a State program and does not operate under USDA guidance. Therefore, all program requirements still apply and milk served to paid students is not free if the SFA is operating SSO or SFSP.

70. Can the Special Milk Program (SMP) operate when schools are operating under SSO or SFSP?

Yes. The DPI SNT requested and was granted a waiver from USDA through June 30, 2021 to waive the SMP requirement that milk be served and consumed onsite. This waiver allows milk to be picked-up by participants and taken off-site. If your SFA is participating in this program and you wish to offer milk in a non-congregate way, you must complete the [waiver](#).

As a reminder, the SMP program is intended to serve students who do not have access to a breakfast or lunch meal service. If this has changed due to virtual meal pick up options, a student who does not have access while attending school in the building may not qualify for SMP while they have access to meals while school is virtual.

71. Is milk served in the Special Milk Program (SMP) affected by the vacated 2018 Final Rule, which resulted in the return to the previous 2012 Final Rule (i.e. flavored milk may be only skim)?

Yes, milk served in the SMP must now follow the meal pattern requirements of the 2012 Final Rule due to the 2018 Final Rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements being vacated.

Allowable milk types under the SMP now include 1 year of age: unflavored whole milk; 2-5 years of age (not yet in kindergarten): unflavored low-fat (1%) or fat-free (skim) milk; and 5 years of age (in kindergarten and older): unflavored low-fat (1%) milk or flavored or unflavored fat-free (skim) milk. There is no meal pattern waiver for available to serve low-fat flavored milk under the SMP.

72. May Fresh Fruit and Vegetable Program (FFVP) snack be served out of non-elementary school sites during school closures related to COVID-19?

Yes, Wisconsin received a waiver from USDA that allows the State agency to approve SFAs participating in the FFVP to serve FFVP foods at sites that are not elementary schools. Shortly after schools are notified of their SY 2020-21 grant status, an email will be sent to awarded schools with a link to the waiver. SFAs must complete this survey in order to utilize this waiver.

73. Can the FFVP snack be served to non-elementary students?

No, the FFVP snack may only be served to elementary students enrolled at an awarded FFVP school.

74. May parents pick up FFVP snack for their students during school closures related to COVID-19?

Yes, Wisconsin received a waiver from USDA that allows the State agency to approve SFAs participating in the FFVP to distribute FFVP foods to a parent or guardian to take home to their child/children. Shortly after schools are notified of their SY 2020-21 grant status, an email will be sent to awarded schools with a link to the waiver. SFAs must complete this survey in order to utilize this waiver.

75. What information should be used to determine FFVP eligibility in SY 2021-2022? [USDA Memorandum SP 05-2021, Q8 \(new 1/14/21\)](#)

State agencies generally use free and reduced price school meal data from the preceding October to identify elementary schools eligible to participate in FFVP in the subsequent school year. However, as many

SFAs will not have accurate October data because of program changes due to COVID-19, State agencies may use the data they determine to be most accurate. Therefore, State agencies may use data from October 2020 or a different month during SY 2020-2021 they determine to be more accurate, data from October 2019, or data newly collected for SY 2021-2022; the data chosen must be used consistently throughout the State.

USDA Foods and Procurement

76. Who do we contact with USDA Foods questions?

Contact the USDA Foods team at DPISNUSDAFoods@dpi.wi.gov or call (608) 266-3615.

77. What if our school does not participate in USDA Foods Program and would be interested in receiving USDA Foods?

If your school does not participate in the USDA Foods Program and needs additional foods to serve meals please contact the [USDA Foods team](#) to discuss options.

78. Will fewer meals served in SY 2019-20 and SY 2020-21 affect future USDA Foods entitlement dollars?

[Families First Coronavirus Response Act \(FFCRA\) Opt-In Waiver for School Year 2020-2021 National School Lunch Program USDA Foods Entitlement Calculations](#)

Pursuant to section 2202(a) of the FFCRA, Food and Nutrition Service (FNS) is establishing a nationwide opt-in waiver to help minimize the impact of coronavirus related school closures on USDA Foods entitlement calculations.

Due to widespread school closures resulting from COVID-19, there is a potential that reimbursable lunch counts will be reduced in Wisconsin. These reductions may result in decreases to the USDA Foods entitlement available to our state for SY 2020-21, which could lead to less USDA Foods provided in school meals. Therefore, FNS waives Section 6(c)(1)(C) of the National School Lunch Act (NSLA), and our state may elect to opt-in to this waiver and forego the annual entitlement adjustment process in October 2020.

The Wisconsin DPI has elected to opt-in to this waiver. No action is required on the part of the SFA. As a result of the WI DPI opting into this waiver, the following will occur for all WI SFAs participating in USDA Foods:

- The preliminary SY 2020-21 entitlement level, based on SY 2018-19 lunch counts, which state agencies were assigned in January 2020 for placing SY 2020-21 orders, will be the final entitlement value assigned for SY 2020-21. The November 2020 price file will still be updated as normal.
- In October 2021, entitlement adjustment is planned to occur as normal. In other words, SY 2021-22 USDA Foods entitlement will reflect lunches served in SY 2020-21.

79. We are operating the Summer Food Service Program (SFSP), in lieu of the National School Lunch Program (NSLP) until December 31 (or until USDA funding and waivers remain). Can we utilize our USDA Foods

(brown box finished products, direct diversion pounds, and state processed products) earned under the NSLP, to prepare meals for the SFSP?

Yes. USDA Foods earned under the NSLP can be used to prepare meals for the SFSP, or any other Child Nutrition Program (CNP) meal like the CACFP, SBP, afterschool snack program, SSO, and even a la carte food sold to children. Per § 7 CFR 250.59(b), the school food authority must use donated foods, as much as is practical, in the lunches served to schoolchildren, for which they receive an established per-meal value of donated food assistance each school year. However, the school food authority may also use donated foods in other activities of the nonprofit school food service. The SFA should ensure all entitlement received accrues to the benefit of the CNPs, regardless of individual program participation.

80. How do I manage my deliveries and inventory?

Please refer to the DPI USDA Foods [Deliveries and Inventory Management Information](#). Suggestions from schools include:

- Repackaging USDA Foods items into portion cups
- Planning menu with emphasis on using available USDA Foods; eliminating some non-USDA Foods from menu
- Planning to use USDA direct diversion pounds on every entree item
- Simplifying cycle menus
- Staying flexible on menu to use the USDA Foods available; planning menus on a weekly basis instead of the monthly; keeping menus subject to change
- Planning to order another reach-in freezer

81. For managing inventory, are we going to be able to carry over pounds later than the new September 30, 2020 deadline, since we weren't able to use as much as we could have in spring with COVID?

Please refer to the current [Inventory Carryover and Sweep Policy](#).

82. What is the carry over deadline?

There is no carryover for USDA Foods Programs. Please refer to the current [Inventory Carryover and Sweep Policy](#).

83. Is there any kind of official system or policy to donate to other school districts?

Yes. Please refer to [Deliveries and Inventory Management Information](#) under Transfer or Donate Inventory. Be sure to follow the [Transfer USDA Foods Inventory Guidance](#) Consider utilizing the [WI USDA DPI Transfer Documentation Form](#) to keep records.

84. If I elect to donate my USDA Foods, are there charges associated with it?

If your school is choosing to transfer or donate USDA Foods products, whether the product is at the state warehouse, your commercial distributor, or at your school, your SFA is still responsible for DPI fees.

Although your SFA can negotiate fees based on the cost to transfer products, SFAs are not allowed to charge for entitlement value or make a profit in transfer or donation of USDA Foods.

85. Can the SFA package and distribute frozen food items (e.g. precooked chicken nuggets) for families to heat at home as part of the reimbursable meals?

Yes, if specific measures are taken. These food items must meet the applicable NSLP/SBP meal pattern requirements in order to be served as part of the reimbursable meal. Additionally, SFAs should ensure that these types of food items are distributed with clear cooking instructions for the household to follow, including directions to heat the food to an internal temperature of 165 degrees F before consuming. For frozen items, the SFA should also communicate safe storage guidelines if the foods will not be prepared and eaten immediately. Safe storage guidelines for items intended to be heated at home should advise that the foods be held at 41 degrees F or below (or kept frozen, if applicable) until used. SFAs should consider the kitchen equipment and food preparation requirements involved in the meals provided, as households may be limited in these respects. Please reference the [USDA Memorandum SP 13-2020](#) for further guidance.

If SFAs choose to include frozen food items in the meals, the items should be labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. SFAs should not distribute any raw animal-based time/temperature control for safety (TCS) food items, such as raw chicken, raw eggs, raw beef, etc. There are many frozen [State Processed Products](#) available that could be incorporated into reimbursable meals.

If you are unsure if a frozen item may be considered “fully cooked,” “precooked,” or “ready-to-eat,” please contact your local regulatory authority and/or sanitarian to discuss your specific question and obtain additional guidance. If you have questions about a state processed product on the list above, please contact a DPI USDA Foods team member.

86. It is becoming difficult for my agency to source disposable portion controlled food storage containers, like clamshells. What other options do I have to package meals?

SFAs may have to adapt and utilize alternative food storage containers not typically utilized or procured. Suggestions include, but are not limited to: aluminum foil, portion cups with lids, paper boats with plastic wrap, wax paper to wrap a sandwich, ziploc bags, styrofoam cups with lids, or even banana leaves. Banana leaves are available frozen at most grocery stores.

It is possible that other schools, grocery stores, college dining facilities, or local restaurants will still have items like this to purchase. When making unplanned purchases, follow the below guidance on Emergency Procurement.

Emergency Procurement

2 CFR 200 allows for a type of procurement called an “Emergency Procurement”. This means, if necessary, school food service staff can conduct emergency purchases to continue uninterrupted food service using noncompetitive procurement methods. This type of procurement or purchase is short term in duration. Records must be kept to track these types of purchases. For example, a log of all such purchases must be maintained and reviewed monthly by the school food service department. The log of emergency purchases should show:

- **Contractor/Supplier Name**
- **Contractor/Supplier primary contact information and address**
- **Contractor/Supplier name of person supplying pricing**
- **Purchase amount/contract value**
- **Description of product and/or service being purchased/contracted**
- **If applicable, duration of contract (contract term)**
- **Reason for emergency**

87. How many bids do we need to put in for milk please?

At least two bids are required, three are recommended.

Food Safety

88. Does SSO have different food safety inspection requirements than NSLP?

No, these requirements are the same. Schools are required to obtain a minimum of two food safety inspections during the year; sites participating in more than one Child Nutrition Program are not required to obtain more than these two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals. With SSO, there is no requirement for the SFA to obtain an additional food safety inspection.

89. What documentation must an SFA have if they are unable to obtain a food safety inspection during the COVID-19 emergency?

Per [USDA Memorandum SP 21-2020](#), if an SFA is unable to obtain a food safety inspection because the State or local health department has suspended inspections due to the COVID-19 emergency, an SFA would need documentation (e.g., a letter or email) from the health department that these inspections have been suspended. The SFA should make every effort to receive two food safety inspections in a school year and maintain documentation of communications and requests to the local health department. This documentation will be requested during an AR to show compliance with this requirement.

90. Are there guidelines for Personal Protective Equipment (PPE)?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance June 19, 2020](#) states: "Schools should provide masks or cloth face coverings and require food service workers and cafeteria monitors to wear them while performing their duties."

91. Can a food service employee plate the salad bar for students?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance June 19, 2020](#) states: "Remove salad bars or other opportunities for self-service or "high-touch" touch points." This guidance does not address a food service employee plating foods for students. Consider the amount of time it takes for a food service employee to plate the salad bar versus having salads pre-portioned with varying toppings available on the serving line.

92. Are districts considering bag type lunches for classrooms? Or hot meals? And how do you keep food at temperature for classroom consumption?

Each SFA has the ability to determine if they want to serve cold or hot meals in the classroom. Serving lunches in the classroom can be similar to serving breakfast in the classroom. For ideas on what to consider,

refer to the [UW-Extension Breakfast in the Classroom Toolkit](#), specifically the sections within Developing a Plan: What are service options, How will the classroom set up and clean up work, Are there equipment, supply, preparation and storage needs, and Are there food safety concerns.?

If you have not served meals in the classroom previously, a standard operating procedure (SOP) is required as part of your food safety plan.

93. What is the guidance for sneeze guards?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance June 19, 2020](#) states: "Installing physical barriers, such as sneeze guards and partitions, particularly in areas where it is difficult for individuals to remain at least 6 feet apart. Consider installing a plexi-glass barrier in front of work service workers and cashiers."

94. How do we keep students social distanced through the lunch line?

Health and safety regulations and recommendations can vary by county. SFAs may want to contact their local health department for guidance on serving meals safely. In addition, consider working with other school staff to educate children on safe ways to slow the spread of COVID-19 including social distancing, proper hand washing, and avoid touching face, nose, or eyes.

Examples of ways to create physical distance between students may include:

- Physical guides such as floor decals, colored tape, or signs to indicate where students should sit or stand.
- Have students sit in a zigzag pattern so they cannot sit opposite or next to each other.
- Disallow anyone to sit on the end seat next to a high-traffic area.
- Create one entrance and one exit for a one-way traffic flow.

Other ways to slow the spread of COVID-19 may include:

- Create signs, including visual cues, about stopping the spread of COVID-19 and post in highly-visible areas of the cafeteria such as the entrance door or lunch tables.
- Eliminate self-service including salad bars.
- Stagger the use of the cafeteria to allow for time to clean and sanitize highly-touched areas between groups.
- Disallow students to pass or share items including food.
- Have students wash their hands immediately before entering the cafeteria.
- Have hand sanitizer available at the beginning of the serving line and in the cafeteria.

95. When sending meals home with students, what do we need to consider related to food safety?

Sending food home with students can cause concern, especially because the meals will likely contain time-temperature control for safety (TCS) foods. If meals will be sent home with students, consider a pre-ordering system so families are aware of what food should be coming home and when. Additionally, placing food items in a separate bag instead of in backpacks may help draw attention to the food so it can be stored safely and in a timely manner, such as immediately into the freezer or refrigerator. Extra communication to families on days food will be going home with students may also help lower concerns. Alternatively, parents could pick up meals on behalf of their students at designated times and locations. You may want to speak with your legal counsel regarding food safety liability.

96. Does everything we serve need to be pre-packaged? Do we need to serve meals using only disposable foodservice items?

No. Meals do not need to be pre-packaged and use of disposables is not required, though these are both options. School foodservice professionals can serve food to students through a line in the cafeteria. However, it is recommended that self-service areas be removed and that staff hold responsibility for plating all meals.

97. Guidance from the CDC only mentions washing non-disposable dishes with dish soap and hot water (or in a dishwasher). If non-disposable dishes are washed by hand, do we still need to sanitize them?

Yes. All hand washed non-disposable dishes also need to be sanitized, as they normally are when utilizing a three-compartment sink for manual dishwashing. Schools that participate in NSLP must follow the Wisconsin Food Code, including the requirements regarding sanitizing food-contact surfaces. Please review the [Wisconsin Food Code Fact Sheet: Washing and Sanitizing Food Contact Surfaces](#) for a reminder on these requirements.

98. How do we accommodate for Temperature Control for Safety (TCS) foods during pick up?

TCS foods must be handled as they normally would: through refrigeration or by heating. Cold foods must be kept at 41 degrees or lower and hot foods must be maintained at 135 degrees or above.

99. Can we do bagged lunches for the first two months of school due to the pandemic?

Yes, this is allowable.

100. If we are serving meals in the cafeteria, do we need to utilize plexi-glass?

This is not a DPI requirement, but highly recommended. Check with your local sanitarian for guidance.

101. If we are serving meals in the cafeteria, how do we handle milk cartons from the cooler?

DPI recommends distributing milk cartons on the line by a trained staff member using gloves.

102. When offering meals, can we consolidate from 12 sites down to 6 so we have fewer buildings to keep sanitized?

Yes, school districts may consolidate the number of sites that offer meals. They must ensure that such consolidations will not be restrictive and that all households and their children from the 6 closed sites will have access to the meal service at the 6 operating sites.

103. Can a school accept food donations and utilize it as part of a reimbursable meal?

Schools may accept and use donated food from other schools that participate in the USDA CNPs and have extra food they want to share, including USDA Foods. This food may be used as part of a reimbursable meal.

Schools may also be able to accept food donations from other sources for use in reimbursable meals, however specific restrictions and considerations apply. Schools must procure all food used in the CNPs

from approved sources, as defined by the Wisconsin Food Code. Schools should contact their local regulatory authority or sanitarian for assistance in determining if a prospective donor and their food products are permissible to accept. Please note that the following are a few examples of items that **cannot** be accepted:

- Food prepared in a private home, including, but not limited to, home-canned items. Per the Wisconsin Food Code, these types of items cannot be used or offered for consumption in a food establishment.
- Salvaged foods, such as those from a food pantry or food bank.
- Packaged foods that are not properly labeled in accordance with the applicable labeling laws.

Schools should keep in mind that donated items must be held to the same food safety standards as purchased products. Before accepting donated products, schools should inquire about freshness, shelf life, safe handling procedures, and required storage temperatures. Supporting documentation, including written specifications for time/temperature control for safety (TCS) foods, as well as written letters from suppliers indicating they follow a HACCP plan, should be maintained. The school should also document all donated items received by recording a description of the item(s), quantity, date of transaction, and name of donor school or other agency. The donor should retain the same documentation.

If schools do not wish to accept food donations or are unable to do so, interested donors can be directed to other local organizations (such as food pantries, the Red Cross, etc.) that may be able to accept the donations. Please contact the [DPI SNT food safety specialist](#) with further questions.

Child and Adult Care Food Program (CACFP)/Providing Free Meals to Group Child Care Centers and Family Day Care Homes

For DPI's CACFP COVID-19 Information visit [CACFP COVID-19 Information](#).

104. Can an SFA or other sponsor that participates in both SFSP or SSO and CACFP At-Risk provide meals and snacks through SSO or SFSP and At-Risk to each participant? Do the Programs have to be operated at the same site or different sites? Can participants pick up multiple meals at once?

An SFA or a community organization, if approved to operate both Programs, can locate them at the same or at different sites. The SFA or community organization may allow children to pick up multiple meals from each Program at one time. However, the maximum number of meals that may be offered to each child may not exceed the number of meals allowed by each Program. Under SFSP and SSO, up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper, are allowed. Under CACFP At-Risk, up to one snack and one meal per child per day are allowed. If the SFA or community organization is operating both Programs at the same site and all the meals for both Programs are picked up at the same time, each Program must keep accurate meal counts and claim only the meals served for that specific Program.

The State agency may approve a plan that includes pick-up of meals for multiple days, up to one week at a time.

105. Are CACFP At-Risk Afterschool Programs required to provide an education or enrichment activity when providing non-congregate meals?

Yes. At-Risk programs providing non-congregate meals must provide an education or enrichment activity for each day the meal/snack is served. Although children are not required to participate in or complete the activity in order to receive an afterschool meal or snack, the afterschool care center must offer the activity.

When meals are served using the non-congregate and parent pick-up waivers, these activities may be conducted virtually or in other non-congregate ways. For example, programs may offer online homework assistance, activity packets, electronic games and books, or other e-learning activities for the participants to complete at home. Team Nutrition offers a variety of online games, books, and nutrition education activities: [Digital Nutrition Resources](#).

106. For CACFP At-risk Afterschool Programs and NSLP Afterschool Snacks, if the educational or enrichment activity is electronic and a child does not have access to the required electronic device, is the activity still considered available to all?

As Program operators begin to plan enrichment activities for participating children, FNS encourages them to consider the ability of children to access various activities. It may be appropriate to offer some activities that children could participate in without internet access or electronic devices, such as books, activity packets, or coloring sheets. USDA Team Nutrition offers a variety of games, books, and nutrition education activities for children through the [Digital Nutrition Resources for Kids webpage](#) (pg. 4). Although children are not required to participate in or complete an activity in order to receive an afterschool meal or snack, whatever activities are offered should include options that are accessible to all participating children.

107. May CACFP at-risk centers providing extended care during the day (both school hours and afterschool hours) claim reimbursement for a breakfast and/or lunch served in addition to the one meal and one snack allowed for at-risk?

No. Centers that are only approved to operate under the CACFP at-risk component may not claim reimbursement for meals that exceed their program meal limitation of one meal and one snack per child, per day. CACFP child care centers that operate a separate daytime child care and at-risk afterschool program may be approved to claim reimbursement for up to two meals and one snack, or one meal and two snacks, per child, per day. This applies to children who attend just the daytime child care or attend both programs. For children that attend both programs, the center must ensure duplicate meals are not claimed. CACFP at-risk centers that wish to also operate a licensed child care program should contact their State agency for guidance.

108. Are CACFP At-Risk Afterschool Programs required to maintain attendance records when providing non-congregate meals?

At-risk afterschool programs who choose to provide non-congregate meals only need to maintain daily attendance records for participants who physically attend the program (sign-in sheets or, with state agency approval, other methods which result in accurate recording of daily attendance). Those at-risk programs that do not have children actually in attendance do not need to maintain daily attendance records. However, the program must maintain accountability and program integrity, including processes to ensure meals are provided to participants, and that they do not receive duplicate meals from other child nutrition programs (i.e. NSLP, SBP). At-risk afterschool programs must still maintain daily meal counts.

109. Are take-home weekend meals allowed in the CACFP At-Risk afterschool program?

Yes, the CACFP At-Risk afterschool program allows for a maximum of one snack and one meal per child per day. Meals must be served after school except on weekends and holidays, when meals may be served at any time of the day, as approved in the CACFP contract. Agencies participating in CACFP need to elect to participate in the waivers that allow take-home meals. Follow the instructions in the [July CACFP Bulletin](#) to participate in these waivers.

110. May children that are unable to attend a child care center or family day care home due to a closure participate in SSO or SFSP sites operating through June 30, 2021?

Yes, if the meal feeding site is operating as an open site. Open sites may feed all children ages 18 and under.

111. May school age children who attend a child care center or family day care home during virtual school time participate in SSO or SFSP sites?

It depends. If the child care center is not providing and claiming meals for those children through the CACFP then meals are available from open SSO or SFSP sites for children and youth in your household 18 years old and younger.

If the child care site is providing meals and claiming them through the CACFP then the children should not be supplied the same meals through the SSO or SFSP. This is considered "double claiming" of meals within the CNPs. For DPI's CACFP COVID-19 Information visit [CACFP COVID-19 Information](#).

112. Can SSO/SFSP sites provide meals to child care centers? **(updated 3/8/21)**

Yes, if the SFA operating a SSO/SFSP site has the capacity to provide meals they are allowed to do so; however, it is not required.

Before providing meals to a child care center the SFA should ensure the following occurs:

- Communicate to the child care center receiving meals that they are required to inform households with children enrolled in care about the child care center's participation in the SSO/SFSP and confirm that enrolled children are not receiving meals from another SSO or SFSP site.
- The SFA must ask if the child care center normally claims meals or snacks in the Child and Adult Care Food Program (CACFP). If the child care center participates in the CACFP, the SFA should communicate that they will need to contact the CACFP consultant assigned to their contract to discuss feeding plans.
- Discuss with the child care center how infants will be receiving meals. The SFA or the child care center can provide meals to infants.
- Ensure all meals served to the child care center meet the [Infant and Preschool Meal Pattern](#) requirements for all participants, including infants (if providing meals to infants) and provide accommodations for children with disabilities who attend the center.
- The child care center must become a site within the SFA's SSO/SFSP application. Contact [SNT SSO Specialists](#) to have the child care added as a site to the SSO application or amy.kolano@dpi.wi.gov to add a child care center to the SFSP application.
- As a site, the child care center must adhere to all site requirements including **taking a point of service meal count**, training, calling ahead to order meals, posting the And Justice for All poster, and on-site monitoring (when monitoring is not waived).
- Confirm with the child care center that they will be responsible for providing any meals served during time when the SFA is closed and unable to provide meals.

Completing an agreement between the CACFP program and SFSP/SSO sponsor is recommended to detail who will provide meals/snacks, including infant meals and special dietary accommodations. The agreement should outline dates the SFSP/SSO sponsor is unable to provide meals. The CACFP program must maintain support documentation on file for any meals being provided by the SFSP/SSO sponsor.

113. Can SSO/SFSP sites provide meals to family day care homes (in-home child care)? (new 3/8/21)

Yes, if the SFA operating a SSO/SFSP site has the capacity to provide meals they are allowed to do so; however, it is not required.

Before providing meals to a in-home child care the SFA should ensure the following occurs:

- The SFA must ask the child care provider if they participate in the Child and Adult Care Food Program (CACFP) **AND** contact DPI at CNT@dpi.wi.gov with the name and address of the provider.
- The SFA must work with the provider to obtain a one-time consent from the parents/guardians of their enrolled children to accept the meals on behalf of their household, for the children in the provider's care. The households must be reminded that they should not be picking up meals from another SSO/SFSP site. Below is an example of a one-time consent statement that could be collected by the child care provider.

I give my child care provider permission to accept meals through the federally funded Seamless Summer Option or the Summer Food School Program on the behalf of my child(ren). I understand that I should not pick up meals from another site participating in either program for my child(ren) receiving these meals through the child care provider.

- The SFA and child care provider must discuss how infants will be receiving meals. The SFA or the child care provider can provide meals to infants.
- Meals provided by the SFA to a licensed in-home child care must meet the [Infant and Preschool Meal Pattern](#) requirements for all participants, including infants (if providing meals to infants) and provide accommodations for children with disabilities who attend the center.
- The SFA and child care provider will need to discuss a feeding plan in the event the SFA cannot provide meals during a certain time, such as closures due to COVID-19 or during planned breaks, such as spring break.
- The in-home child care does not become a site on the SFA's SSO Application.

114. Can the meal pattern flexibility waiver be used in any scenario to waive infant and preschool (CACFP) meal pattern requirements? (new 3/8/21)

The [infant and preschool meal pattern](#) must be provided to all licensed child care centers (this is in child care licensing regulation). The child care center may request a waiver of the infant and preschool meal pattern from their licenser but there is no guarantee that this will be approved. As the SFA is claiming these meals and receiving Federal funds, the SFA is responsible for ensuring the meals meet infant and preschool meal pattern requirements. The USDA meal pattern flexibility waiver may not be used to waive the infant and preschool meal pattern in licensed child care.

The only time the CACFP meal pattern may be waived is when a school-operated daycare, which is exempt from holding a child care license, co-mingles the daycare students with older students at meal service time.

115. Can a school continue to serve child care children until June 30th but discontinue service for older students on the last day of school under SSO/SFSP? (new 3/8/21)

Yes. If school is not operating, the child care center should become a closed enrolled site and only child care children, attending in-person, could receive meals.

116. How do we claim meals provided to a child care center under SSO/SFSP? (new 3/8/21)

A point of service meal count must be taken on-site when the children eat the meals. Taking a meal count when the center picks up the meals from an open SSO/SFSP site **cannot be used to claim meals**. The SFA and child care center should develop a process for returning meal counts to the SFA for claiming. The meal counts can then be added to the counts for the location at which the meals were picked up/delivered from and claimed according to the procedures in the [SSO Claiming Manual](#) or the [SFSP Claiming Instructions](#).

Reporting and Compliance Audits under SFSP and SSO

117. Will a State agency audit/compliance review be required for the SSO?

Per USDA guidance and clarification, an SSO audit will only be required for SFAs operating SSO the summer before or after the year they were scheduled for an AR. All ARs that were scheduled for SY 2020-21 will be postponed until SY 2021-22. Therefore, no SSO audits will be conducted in SY 2020-21.

118. Our SFA is scheduled for an Administrative Review (AR) in SY 2020-21. We are operating under SSO or SFSP through June 30, 2021. Does this change anything regarding the review?

The AR is designed specifically for SFAs operating the NSLP and SBP. The AR is not required or designed for either the SSO or SFSP. With the USDA COVID-19 Child Nutrition Response #59, which extended the option to operate SSO or SFSP through June 30, 2021, there are minimal SFAs that were scheduled for an AR and continue to operate NSLP/SBP during SY 2020-21.

The USDA has provided the opportunity and encouraged State Agencies to postpone all ARs until SY 2021-22. Therefore, the SNT has decided that all ARs that were scheduled for SY 2020-21 will be postponed until SY 2021-22.

119. What reporting requirements will there be?

Each State agency (SA) that elects to be subject to the USDA COVID-19 waivers must submit a report to the USDA not later than 1 year after the COVID-19 waivers were elected. As a result of this requirement, the DPI School Nutrition Team has already been requesting some information on waiver elections by SFAs and the SA may request additional information needed for USDA reporting, including:

- A summary of the use of the COVID-19 waivers, and
- A description of whether the waivers resulted in improved services to children.

120. Since we are operating SFSP or SSO, how should we proceed with completing the FNS-10, Paid Lunch Price Report (PLP), the Verification process and report, and the PI-1441 (civil rights self monitoring) reporting requirements?

The [Paid Lunch Price Report](#) and [FNS-10 Report](#) Instruction manuals have been updated to provide guidance on how to complete these reports for SFAs operating SSO or SFSP in SY 2020-21. These manuals are also located on the SNT [Reporting webpage](#). As a reminder, these reports must be submitted to be able to submit the October claim.

See [question](#) below for an update on the verification process and report.

121. What are the Civil Rights Self-Monitoring Requirements (PI-1441) for SY 2020-21?

SFAs operating the SSO in SY 2020-21 are required to complete the annual [Civil Rights Compliance Self-Evaluation \(i.e. PI-1441 form\)](#). This form is to ensure all civil rights requirements are met or to self-identify if there are any areas of concern that need to be corrected. This form is due by October 31 annually, but **the due date has been extended to January 31, 2021 for SY 2020-21 due to COVID-19**. The completed form is not submitted to the state agency, but is requested as part of an Administrative Review. When completing sections of the form that ask about race/ethnicity and free and reduced price meal applications, use the most current information available, which may be from SY 2019-20 or SY 2020-21.

SFAs operating the SFSP are required to complete a [Race and Ethnicity Data Form](#) once for each site operating during SY 2020-21. Further instructions are provided in the [SFSP Requirements for SY 2020-21](#).

Financial Management

122. Is there a specific project code to use for the SSO for food service?

No, meals provided under the SSO are claimed under existing programs, such as NSLP, or SBP.

123. Is the purchase of personal protective equipment or other supplies that are intended to prevent or reduce the spread of COVID-19 an allowable cost?

Yes. Personal protective equipment (gloves and face masks) as well as cleaning and sanitary supplies are allowable costs during the current public health emergency, provided that such purchases are made in support of the Child Nutrition Program operations.

124. We are currently serving meals under the SFSP. Can I charge my labor expenses under the NSLP and receive the revenue under the SFSP?

No. Both revenues and expenses would need to fall under SFSP.

125. Is reimbursement for mileage and meal delivery costs (staff time/benefits/gas/mileage) an allowable food service expense?

Yes, as long as the delivery costs are for food service purposes. Make sure the time is tracked specifically for this food service function and ensure you practice safe food handling during delivery. The food service account cannot pay for other tasks/deliveries unrelated to food service.

126. What funding is available for meal delivery?

There is no additional reimbursement for home delivery or mobile meals delivery, but related expenses, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO. Delivery costs could also be paid with non-program funds such as State or local funds, or private donations.

127. Are there established federal and/or state rates that public school districts must use when reimbursing staff for mileage?

Most businesses use the maximum [reimbursement rates](#) set by the IRS. Many districts choose to use this rate also but they can set whatever rate they like as long as it is in approved district policies.

128. Can students receive extra items, such as an extra entree or extra milk under SSO or SFSP?

The student can receive a free reimbursable meal under SSO or SFSP that meets the meal pattern requirements. Any additional items the student receives must be charged as ala carte to the student.

129. May schools operating SFSP/SSO during the school year sell a la carte food items and beverages? (new 10/20/20)

Yes, per [USDA Memorandum SP 01-2021](#) Q6, schools operating SFSP/SSO may sell a la carte foods and beverages, as long as they continue to meet the [Smart Snacks requirements](#). Foods and beverages sold in competition with reimbursable meals on the school campus during the school day must meet the Smart Snacks standards described in 7 CFR 210.11, regardless of whether the school is operating NSLP/SBP or SFSP/SSO. Schools that are operating grab and go sites in areas outside of the school campus, or providing meals before or after the official school day, are not required to meet the competitive food standards.

130. What are schools thinking about for a la carte sales or extras? For some schools this generates much needed revenue. From a budget standpoint this will create a huge loss in the food service programs.

The SNT recommends discussing a la carte and extras with school administration to determine the best course of action. If implementing, consider pre-packaging or unitizing a la carte items or extras to ensure food safety. If SFAs have ideas or best practices on how to incorporate a la carte items or extras during COVID-19, please share with the SNT.

131. Will the participation number from this school year negatively affect our severe need breakfasts in the future? (USDA Memorandum [SP 04-2021.Q9](#))

Schools operating a breakfast program may be determined eligible for severe need reimbursements if at least 40 percent of lunches served to students at the school in the second preceding school year were served free or at a reduced price (7 CFR 220.9(d)). SFAs may be determined eligible for an extra 2 cent reimbursement if 60 percent or more of the lunches served in the NSLP during the second preceding school year were served free or at a reduced price (7 CFR 210.4(b)(1)(ii)). Therefore, calculations to determine eligibility for severe need breakfast funding and extra 2 cent NSLP reimbursement for SY 2020-2021 will be calculated using data from SY 2018-2019. FNS will issue additional guidance regarding eligibility determinations for future years - see Q.135.

132. How will State agencies calculate eligibility for severe need breakfast funding in SY 2022-2023 for schools operating SFSP/SSO in SY 2020-2021? [USDA Memorandum SP 05-2021, Q5](#) (new 1/14/21)

Schools that do not have adequate student eligibility data for SY 2020-2021 due to their participation in SFSP/SSO may demonstrate to the State agency that they qualify for severe need reimbursement using claims data from SY 2019-2020, SY 2021-2022, or SY 2022-2023. Schools should use the data they determine most accurately reflects their free and reduced price eligibility percentage. Consistent with existing policy for new schools, as outlined in [USDA Memorandum SP 23-2005: Eligibility for Severe Need Rates for the School Breakfast Program](#), schools that opt to use SY 2022-2023 data may qualify for severe need funding if they serve at least 40 percent of their lunches free or at a reduced price for the first three claims of SY 2022-2023. Severe need reimbursements to these schools will have retroactive effect, encompassing the three months that were used to establish the school's eligibility in SY 2022-2023.

133. A household does not want to receive free meals and insists on paying, can we charge them?

The SSO and SFSP regulations do not allow students to be charged for meals. If a household would like to pay for their meal, they may do so as a donation. The donation can be received into foodservice (Fund 50 for public schools, Source 291, Gifts).

134. Will the reimbursement rates be increased to offset increased costs?

USDA has released [reimbursement rates](#) for the SSO for SY 2020-21. The 2020 [SFSP rates of reimbursement](#) will be in effect through December 31, 2020.

135. Can time spent working on Pandemic EBT (P-EBT) over the summer be charged to the non-profit school foodservice account?

Yes, this is an allowable cost to the non-profit school foodservice account.

136. May Child Nutrition Program operators that have received a loan through the Paycheck Protection Program (PPP), made available through the Small Business Administration and qualified lending partners, use SFSP or CACFP Program funds received from the State (Child Nutrition Program Federal funds) to pay back a PPP loan? [USDA Memorandum SP 05-2021, Q10](#) (new 1/14/21)

Congress authorized the PPP through the CARES Act and Consolidated Appropriations Act, 2021 to help businesses facing extenuating circumstances due to the COVID-19 pandemic to cover their payroll expenses. Some sponsors have used PPP funds to pay for Child Nutrition Program labor expenses.

Under certain circumstances, a PPP loan may be forgiven.

- **If the PPP loan is forgiven:** Any Child Nutrition Program expenses paid for using those forgiven PPP funds may not be claimed using Child Nutrition Program funds since they have *already* been paid with another source of Federal funding.
- **If the PPP loan is not forgiven:** Child Nutrition Program funds may only be used to repay that portion of the loan which was used to cover allowable Child Nutrition Program expenses. This is consistent with existing guidance outlined in FNS Instruction 796-2 Rev. 4 (refer to heading titled *Costs Funded From Other Sources and Under Recovery of Costs*). Program operators using Child Nutrition Program funds to repay any portion of a PPP loan must fully document such repayments, be able to demonstrate that funds were properly allocated, and that such repayments were limited to the portion of the loan that was used to cover allowable expenses under the Child Nutrition Programs. In most circumstances, FNS anticipates that the same payroll cost allocation used by the program operator under normal procedures will continue to apply when considering PPP repayments, though exceptions may occur.

However, please note that interest due in connection with a PPP or other loan repayment is not an allowable cost and may not be paid using Federal Child Nutrition Program funds, per requirements at 2 CFR 200.449(a). Program operators are further reminded that Child Nutrition Program funds may only be used to pay for allowable Child Nutrition Program expenses. For any portion of a PPP loan that was used to pay for non-Program expenses, Child Nutrition Program funds may not be used for repayment.

137. What waivers do we need to fill out for SY 2020-21?

For SFAs operating the SSO:

The following waiver forms can be found on the [SSO COVID webpage](#):

- [Waiver to Allow Non-congregate Feeding](#)
- [Waiver to Allow Meal Service Time Flexibility](#)
- [Waiver to Allow Parents and Guardians to Pick Up Meals](#)
- [Waiver for Meal Pattern Flexibility](#) (only if needed)

Complete these waivers when you know this is what your school or district plans to implement. The first four listed above do **not** require approval from DPI, however please fill them out for reporting purposes. The meal pattern flexibility waiver **does** require approval from the DPI SNT.

For SFAs operating the SFSP:

- Update the SFSP contract as instructed in the [SFSP Requirements and Deadlines for 2020](#).
- Complete the [Meal Pattern Flexibility Waiver](#), only if needed.
- Your agency will be surveyed at a later date to obtain data needed to report to USDA.

138. Are we correct in understanding that based on question #11 in USDA Memorandum SP 25-2020 that the ability to choose congregate feeding vs non-congregate feeding can now go to the meal level?

Yes, schools may choose to offer certain meals as non-congregate, and others as congregate as outlined in [USDA Memorandum SP 25-2020](#), Q11. For example: A school may choose to offer breakfast as a non-congregate meal, and lunch as a congregate meal. However, any non-congregate meal must be:

- 1) the same type for all enrolled students, and
- 2) made available to all enrolled students whether they attend in-person or virtually.

Keep in mind that if the school is offering meals through SFSP or SSO as an open site, the school must make meals available to all children who attend the site (not just enrolled students).

139. Does the mealtime waiver apply to students who are in-person learning or just virtual? Can the mealtime waiver be utilized in a congregate setting? Or is it strictly for non-congregate?

[Child Nutrition Response #78, Nationwide Waiver to Allow Meal Service Time Flexibility in the NSLP, SBP, and CACFP - Extension](#)³ can be used in the congregate feeding setting as long as it is justified to support safer access to nutritious meals. For example, this flexibility is provided if school start times have changed due to COVID-19, and SFAs need to adjust their meal service times to allow for streamlined access to meals. If the SFA has also elected to use the NSLP non-congregate feeding waiver, they may offer meal pickup outside of the standard 10:00am – 2:00pm lunch times.

140. These waivers were put in place to support access to nutritious meals while minimizing potential exposure to COVID. The meal time waiver talks about distribution of meals through pick-up schedules or delivery plans with designated times for distribution. Does the meal time waiver allow SFAs to do a second chance breakfast after lunch?

[Child Nutrition Response #78, Nationwide Waiver to Allow Meal Service Time Flexibility in the NSLP, SBP, and CACFP - Extension](#) ³ waives the requirement 220.8(l) that schools must offer breakfasts meeting the requirements of this section at or near the beginning of the school day. As per [USDA Memorandum SP 13-2020](#), Program Operators are not required to serve meals at a certain time or allow a certain amount of time to elapse between meals. The intention of this waiver is not to serve a second chance breakfast after lunch and the waiver should be used to support safer access to nutritious meals.

Free and Reduced Price Meal Eligibility and Verification

141. If a school operates under the SFSP or the SSO, should the school continue to collect and process household applications for free and reduced-price school meals? [USDA Memorandum SP 05-2021, Q7](#) (updated 1/14/21)

SFAs that are operating SFSP/SSO for the entire SY 2020-2021 may continue to collect and process meal applications to maintain POS system requirements and to establish eligibility for other benefits, such as P-EBT, state reporting, Wisconsin School Day Milk Program and sites operating the Afterschool Snack program at non-area eligible locations (under NSLP). SFAs that collected household applications prior to October 1, 2020, are required to conduct verification (see [question](#) below for more info on verification). If LEAs choose not to conduct their normal meal application processes in SY 2020-2021, then States may establish children's P-EBT eligibility using LEAs' free and reduced price records from SY 2019-2020. However, SFAs must provide new students, such as kindergarteners, and newly income-eligible children an opportunity to establish their eligibility for P-EBT benefits. USDA strongly encourages States and LEAs to use their existing school meal application processes and direct certification systems to determine these children's eligibility for P-EBT.

142. How does the SFSP/SSO extension impact the 30-day eligibility carryover period?

Per [USDA Memorandum SP 1-2021](#) Q4, the eligibility carryover period is paused during SFSP/SSO operations. Eligibility carryover allows children to maintain their prior school year eligibility status for up to 30 operating days into the subsequent school year. An "Operating day" is defined as a day that reimbursable meals are offered to eligible students under the NSLP or SBP. Schools that did not have any NSLP or SBP operating days at the start of SY 2020-21 may begin the 30-day eligibility carryover period if they transition to NSLP and SBP. This includes schools that had been operating NSLP and SBP at the start of the school year, but retroactively claimed any NSLP and SBP meals as SFSP/SSO meals.

Schools that had a limited number of NSLP/SBP operating days at the start of the SY 2020-21 must deduct any days where NSLP or SBP meals were served and claimed from the 30-day eligibility carryover period. However, these schools may resume the remainder of the eligibility carryover period if they transition back to NSLP and SBP.

143. What if our system already rolled over the eligibility for the 30 day carryover?

Work with your software provider to determine how to revert the eligibility back to the SY 2019-20 eligibility status. See Q143 for new eligibility determinations made for SY 2020-21.

- 144. We have been running DC and processing Free and Reduced Price Meal applications for the 2020-21 SY. In regards to the “pausing” of the 30 day carryover from 2019-20, what if the student has submitted a new application or matched on a direct certification run for the 2020-21 SY that will change their eligibility from 2019-20? What eligibility should the student receive?**

If you are operating under the SSO or the SFSP, all students are receiving a free meal, but their individual student meal eligibility may be different. Student meal eligibility may be needed for state reporting, Wisconsin School Day Milk Program and Afterschool Snack – non-area eligible sites.

When determining a student’s eligibility, the most current eligibility determination applies. Any applications received and processed in SY 2020-21 and/or direct certification runs completed in SY 2020-21 will override the carryover status for students from 2019-20. As a reminder, an “N” code on direct certification is not considered a new eligibility determination.

Please note, all SFAs, regardless of the program you are operating to provide school meals in SY 2020-21, must continue to run direct certification a minimum of three times during 2020-21 SY. This will be especially important for state reporting and qualifying students for P-EBT benefits.

- 145. Are “sharing of information forms” required to be completed for SY 2020-21 if the student only has the carryover benefit from SY 2019-20 and a signed form is on file from last year?**

If your SFA offers households the ability to have local fees waived, such as sports, band and testing fees, if the student qualifies for free or reduced price meals, a new “sharing of information form” is required annually. This applies in SY 2020-21, even if the most current eligibility is from the carryover from SY 2019-20 and the household completed this form last year. More information on sharing of information is located on the [free and reduced meal eligibility webpage](#).

- 146. Do we complete verification if we operate SSO or SFSP for SY 2020-21? ([USDA Memorandum SP 04-2021, Q7](#))**

The USDA released [USDA Memorandum SP 04-2021](#) and [USDA Memorandum SP 05-2021](#), which included guidance that the verification process is still required for all SFAs, regardless of the program operated for the school meal programs in (SY) 2020-21.

The Wisconsin DPI School Nutrition Team submitted a waiver to USDA to exempt SFAs operating the Seamless Summer Option (SSO) and Summer Food Service Program (SFSP) from the verification process. The USDA has not yet approved this waiver.

To ensure compliance with this requirement, all SFAs, that received and processed USDA Free and Reduced-Price Meal Applications regardless of the program operating, should move forward with completing the verification process and submitting the Verification Collection Report (VCR).

Although schools may have transitioned to SFSP/SSO operations and the outcome of verification will not impact a student’s ability to be provided a meal at no charge, because school meal applications are used to establish eligibility for P-EBT, non-area eligible Afterschool Snack and Wisconsin School Day Milk Program, verification is still necessary and required.

The verification process deadline is extended to February 28, 2021 and would only be required for any new applications received by your SFA in SY 2020-21, as of October 1, 2020. The deadline to submit the VCR has been extended to April 1, 2021. All other verification requirements still apply.

If your SFA did not receive any USDA Free and Reduced-Price Meal Applications as of October 1, 2020, the verification process is not required, but the VCR does still need to be submitted. To submit the VCR, complete sections 1-3, section 4 will be all zeros to show no applications were on file as of October 1 and since your SFA is exempt from the verification process, mark 5-1 for section 5 and submit.

More information on verification is located on the [Verification webpage](#).

147. Are SFAs required to use approved household applications on file as of October 1, 2020, to develop their verification sample sizes for SY 2020-2021? [USDA Memorandum SP 05-2021, Q6](#)

Yes. Although FNS extended the verification deadline for SY 2020-2021 to February 28, 2021 (see [Q&As Relating to the Nationwide Waiver to Allow SFSP and SSO Operations through SY 2020-21 – Extension Q&As #3](#)), the sample size used to conduct verification activities must be based on the number of approved applications on file as of October 1, 2020. SFAs are not required to verify any approved meal applications collected after October 1. All SFAs that collected household applications in SY 2020-2021 are required to conduct verification, regardless of the Child Nutrition Program they are operating this school year.

148. If our SFA is operating SSO or SFSP, are we still required to continue direct certification activities? ([USDA Memorandum SP 04-2021, Q11](#))

Yes, all SFAs, regardless of the program you are operating to provide school meals in SY 2020-21, must continue to run direct certification a minimum of three times during 2020-21 SY. This will be especially important for state reporting and qualifying students for P-EBT benefits.

Miscellaneous

149. If we need to hire more substitute cooks, will training requirements be waived?

Having school nutrition staff that are trained, with the knowledge required to perform their jobs, is essential for ensuring food safety and meeting program requirements. We recommend using the training checklist on the [professional standards webpage](#) to identify training topics and needs specific to these staff. If you are having difficulty getting all training hours completed within the two year timeframe, contact the SNT at dpifns@dpi.wi.gov.

150. If we are serving meals to virtual students, where do we need to post “And Justice for All” (AJFA) posters? What about in the classrooms?

Per [USDA Memorandum SP 14-2020](#), when meals are served virtually, the *And Justice for All* (AJFA) poster must be prominently displayed at all facilities and locations that distribute meals. Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed.

Per [USDA Memorandum SP 24-2020](#), the AJFA poster does not need to be displayed in each classroom, but should be prominently displayed throughout the school in an area that is frequently visited by parents and students.

151. Can there be a waiver on water availability? Students may be eating in the classroom and they are shutting off all drinking fountains.

Potable water is required for lunch under SSO, just like NSLP. Per [USDA Memorandum SP 24-2020](#), during the COVID-19 pandemic, the potable water requirement applies when lunch is served in the classroom. Potable water is not required for the SBP or when meals are provided to students who are learning virtually and who are not eating lunch at school. The Afterschool Snack program falls under NSLP and also requires potable water, when this program is operated in a school or community building.

152. Any suggestions of how to recruit extra staff? We have 95 employees and recruiting, training, and scheduling another large group that will be temporary if needed. Many of the changes will be labor intensive while we experience a decrease in revenue.

Suggestions include checking with local restaurants and catering services to inquire if laid-off employees may be interested. Additionally, parents of students in the district may be interested in temporary employment. SFAs may also use volunteers to help lessen extra costs. All staff, including volunteers, must have civil rights training and any additional training associated with their job duties.

153. What are the SFA On-site Monitoring Requirements for SY 2020-21?

On-site monitoring is a self-assessment of the counting and claiming system and general areas to ensure program integrity and accountability. On-site monitoring is required for all SFAs with **more than one school site** operating the NSLP, SBP, or SSO.

Under the [USDA COVID-19: Child Nutrition Response #41](#), SFAs operating the SSO have the ability to waive this requirement for SY 2020-21. SFAs should, instead, to the maximum extent practicable, review program operations off-site (e.g., through a desk audit). USDA has created [Off-site Monitoring Fact Sheets for Child Nutrition Programs](#) for additional guidance and best practices. For SFAs operating SSO, this waiver was included in the SSO application process; no further action is required.

If your SFA did not elect this waiver as part of the SSO application, SFA on-site monitoring is required to be completed by February 1 for any SFA with more than one school site and operating under SSO. An [SSO On-site Monitoring form](#) is now available to better align with program operations under SSO. This form can be used for both breakfast and lunch monitoring.

SFAs operating SFSP are exempt from the NSLP/SBP on-site monitoring requirements, but do need to complete SFSP monitoring as described in the [SFSP Requirements for SY 2020-21](#). On-site monitoring is waived for the SFSP without further application by the SFA.

154. If an SFA does not participate in NSLP/SBP in SY 2020-2021 (they are operating SFSP or SSO), must the SFA amend its State agency agreement (School Nutrition Contract)? [USDA Memorandum SP 05-2021, Q4 \(new 1/14/21\)](#)

FNS will not require SFAs to terminate or amend their NSLP/SBP agreement to reflect that an SFA is no longer operating those programs. Additionally, FNS clarifies that SFAs experiencing a gap in NSLP participation in SY 2020-2021 due to COVID-19 operations will not be considered new NSLP operators in SY 2021-2022. SFAs that participated in NSLP in SY 2019-2020 may return to NSLP according to standard Program procedures in SY 2021-2022.

155. May an SFA participating in SFSP during SY 2020-2021 under *COVID-19: Child Nutrition Response #59, Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through School Year 2020-2021 - EXTENSION* apply for and receive a FY 2020 NSLP Equipment Assistance Grant? [USDA Memorandum SP 05-2021](#) (new 1/14/21)

Any SFA with a previously approved State agency agreement on file to operate the NSLP (per 7 CFR 210.9(b)), and that would otherwise be operating NSLP in SY 2020-2021, may continue to access NSLP Equipment Assistance Grants while utilizing the flexibilities granted under the current SFSP/SSO Nationwide Waiver. This is consistent with past circumstances in which SFSP was temporarily operated during an unanticipated school closure due to a hurricane, natural disaster, or wildfire. Similar to those situations, school Program operators who may be currently operating SFSP in connection with the COVID-19 pandemic are doing so in line with temporary flexibilities offered by FNS.