
School Nutrition Programs COVID-19 Frequently Asked Questions: Volume 4

1. **Question:** The USDA Nationwide Area Eligibility Waiver says it is retroactive to March 20, 2020, what does this mean?

Answer: When the Area Eligibility Waiver says that it is retroactive to March 20th that is for existing sites with an approved Site Application in the SFSP Application Packet. If a sponsor would like to add any new non-area eligible (not at 50% or more F&R and not located in a census data eligible area) school sites, they may do so, but the start date for the site must be after the date of the application submission, it cannot be backdated to March 20th. If a sponsor would like to add any new non-school, non-area eligible sites, they must supply Child Nutrition Programs with an email describing why the new site is well-located to serve children who are in need as a result of COVID-19.

2. **Question:** I made a change in one of my Site Applications and I got the following messages: “Breakfast start date cannot be in the past.” and “Lunch start date cannot be in the past.” What does this mean?

Code	Warning Description
203312	Breakfast start date cannot be in the past.
203372	Lunch start date cannot be in the past.

Answer: These messages will appear any time that a change is made in an approved Site Application. As long as you are not changing the start date to be earlier than the approved start date, you may ignore these messages. They are only a “warning”, not an “error”, and will not prevent you from saving or submitting.

3. **Question:** How do I know under which site to claim meals?

Answer: Meal locations that are delivering meals via a bus route or to children’s houses, should claim the meals under site where the meals are being produced. Per question 4 of [School Nutrition Programs COVID-19 Frequently Asked Questions \(FAQ\) Volume 3](#), if you plan to stay at a bus stop for at least 30 minutes, it must be listed as a separate site.

Please reach out to Child Nutrition Programs to “close” a site if no meals were served there or meals will no longer be served from that location. Please revise the end date in the Site Application and re-submit for approval.

Please contact Jamie Curley at Jamie.curley@vermont.gov or (802)-828-2010 with specific questions about when to add a separate site.



4. Question: Should households continue to complete Meal Applications?

Answer: There are several reasons to encourage households to continue to complete meal applications. Although meals are currently available for free to all children using the SFSP area eligibility waiver, area eligibility requirements are still in effect for Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meals Program.

Additionally, SFSP sites that reach 50% free and reduced at any point during the remainder of the school year and participate in SFSP during the summer can establish “5-year eligibility” where the site qualifies as area eligible for Summer 2020 and four subsequent summers, even if the school is no longer 50% in the next year.

It is also important to highlight the household benefits of applying and qualifying for free and reduced-price meals. A household may apply for benefits at any time during the school year (see page 11 of the [Eligibility Manual for School Meals: Determining and Verifying Eligibility](#)). Households that qualify for free and reduced-price meals are now eligible to apply for the Pandemic Electronic Benefit Transfer (P-EBT) benefit. This is an additional \$5.70 per child per school day through the remainder of the school year available as an electronic benefit to households. VTAOE is not performing another mass data collection to gather household information for P-EBT. Instead, when a household newly qualifies, the Benefit Notification Letter must be sent to the household and to Vermont Department for Children & Families (DCF). This will notify DCF that the child is a qualified student at a school participating in the National School Lunch Program (NSLP) so they will be able to issue the P-EBT benefit. Please see the [Memo on P-EBT Benefits - Instructions for School Meals Determining Officials](#), sent to food service manager and business managers on April 14, 2020 for specific information on processing free and reduced applications during the remainder of this school year. Please make sure to include the student’s birth date when sending the information to DCF.

A final benefit of applying now is that eligibility carries over for up to 30 operating days into the new school year (or until a new eligibility determination is made, whichever comes first). See page 12 of the [Eligibility Manual for School Meals: Determining and Verifying Eligibility](#).

5. Question: With whom can we share students Free and Reduced-Price status?

Answer: Page 86 of the [Eligibility Manual for School Meals: Determining and Verifying Eligibility](#) addresses Disclosure Requirements. For P-EBT specifically, Section 1101(e) of the Families First Coronavirus Response Act allows the sharing of necessary information by SFAs and the Agency of Education with the agency administering P-EBT (in this case, DCF).

In addition, on page 90 of the Eligibility Manual, it states “Unless otherwise indicated in Disclosure Requirements, LEAs must inform the adult household member who signed the application if they plan to disclose or use eligibility information outside the originating program. This may be done by issuing a general notification of potential disclosure or through a specific notification to disclose information to a particular

program [7 CFR 245.6(h)(2)(i)].” Notification requirements are also outlined in this section.

6. **Question:** When will we be required to complete the Community Eligibility Report for 2019-2020?

Answer: An email sent to the field via the Food Service Managers Listserv from the State agency’s Child Nutrition Director, Rosie Krueger on March 26, 2020 announced that the April 1st deadline for establishing direct certification percentages for the Community Eligibility Provision (CEP) has been pushed back, and data from any date between April 1 and June 30 will be accepted. Child Nutrition Programs will be in touch with food service managers and business managers in May and June with further instructions. However, continue to check your Direct Certification List from the state and gather information about other forms of Direct Certification.

7. **Question:** Are we still required to perform our first triennial assessment of our local school wellness policy?

Answer: On April 23, 2020, USDA released a nationwide waiver to extend the deadline for the first triennial assessment of local school wellness policy to June 30, 2021. Based on the July 1, 2017 implementation of the local school wellness policy regulations, the first triennial assessments would have been due June 30, 2020. However, given the circumstances USDA has provided a revised deadline for completion of these requirements to allow SFAs to focus on providing meals during COVID-19. SFAs who were prepared to complete their triennial assessment by June 30, 2020 are encouraged to complete their assessments on time.

8. **Question:** Are we still required to follow all procurement requirements during this time?

Answer: Federal procurement regulations at 2 CFR 200.320(f) allow procurement by noncompetitive proposals when there is a public emergency. For School Food Authorities (SFAs) working on their Food Service Management Company (FSMC) Requests for Proposals (RFPs), it is highly recommended this option be used only as a last resort.

9. **Question:** My FSMC contract is going to expire on June 30, 2020 and I am concerned about awarding a new contract given the current circumstances. What are my options to be able to extend my FSMC contract through 2020-2021?

Answer: On April 24, 2020, USDA released a nationwide waiver that allows SFAs and SFSP sponsors with FSMC contracts that expire by or around June 30, 2020, to be extended through school year 2020-2021 (June 30, 2021). To ensure Program integrity during this time, extended FSMC contracts are limited to one-year only. If Programs are on track with awarding a new contract by June 30, 2020, the State agency strongly suggests SFAs and sponsors continue with the FSMC contract process. If SFAs and sponsors have questions related to FSMC contracts, please contact Michael Carr at Michael.Carr@vermont.gov or at 802- 828-2093.

10. Question: What can I do with leftover food if I cannot re-use it again the next day?

Answer: All sponsors must plan, prepare, and order meals with the objective of providing one meal per child at each meal service, and must ensure that entire meals and food components are not leftover and unusable on a frequent basis. Sponsors should regularly monitor and compare site reports on the number of attending children and the number of delivered meals to reduce waste and cost. When sites have leftover food, sponsors should promptly adjust orders to more accurately reflect the actual number of meal service participants. Additionally, all alternatives permitted by Program regulations and State and local health and sanitation codes should be exhausted before discarding food. When it is not feasible to reuse leftovers or store food, FNS encourages sponsors to consider donating it to non-profit organizations working to address hunger in the community, such as homeless shelters, food banks, and food pantries. The Bill Emerson Good Samaritan Food Donation Act protects donations to non-profit organizations.

11. Question: Is there any flexibility with the portion size requirements in SFSP?

Answer: As referenced in the [SFSP Nutrition Guide](#), “The SFSP meal patterns were designed for children ages 6 through 12 years old”. Therefore, the SFSP meal pattern minimum serving sizes may not be suitable for all children attending the summer site. Children younger than 6 years old and attending the summer site may find the serving sizes may be too big, while active teenagers may need more food and may feel that the portion sizes are too small. In these situations, sponsors may be approved to serve more age-appropriate portion sizes.

For meals served to children 6 and younger, sponsors have the option to serve serving sizes indicated in the CACFP to meet the needs of these children. For meals served to children 12 through 18 years of age, sponsors may serve larger serving sizes than the minimum serving sizes specified in the SFSP meal pattern. There is no maximum serving size in the SFSP meal patterns. Sponsors serving teenagers may also choose to follow the adult meal patterns found in the CACFP ([7 CFR 226.20\(c\)](#)), which has larger portion sizes than the SFSP meal patterns. Additionally, extra foods (foods served in addition to the minimum portion sizes to meet the meal pattern requirements) may always be served to improve the nutritional status of participating children. However, meals containing additional foods or larger portion sizes than the minimum required serving size are reimbursed at the same reimbursement rate as regular SFSP meals.

For sponsors who choose to serve the CACFP serving sizes to children 6 and younger, please add a note in the Application Packet Notes section of the SFSP Application Packet.

12. Question: If we are doing bulk meal service, must we indicate this in the Site Application?

Answer: If you are providing bulk meals, the State agency asks sponsors to edit question 32 in the Site Application, select “Other (provide explanation)”, and indicate in the box provided “Bulk Meals”.

13. Question: We are having trouble meeting other aspects of the meal pattern due to food shortages. What can we do?

Answer: First, attempt to substitute other items for the planned item. The SFSP meal pattern is quite flexible, so in most cases a substitution should be possible.

If a substitution is not possible, reach out to Child Nutrition Programs for a meal pattern waiver, per the nationwide USDA waiver issued on March 25, 2020. This allows sponsors who are experiencing disruptions to the availability of food products resulting from COVID-19 to request a meal pattern waiver from the state agency. Sponsors must provide a description of the circumstances and the meal pattern component affected. The State Agency will approve these waiver requests on a case-by-case basis. Sponsors must have approval prior to serving meals that do not meet meal pattern requirements. This nationwide waiver was extended on April 21, 2020 and will now remain in effect until May 31, 2020 or until expiration of the federally declared public health emergency, whichever is earlier.

14. Question: What are some resources for recipe ideas?

Answer: Many states have developed excellent recipe and cookbook resources. Below is a list of recipe resources geared towards the SBP and NSLP meal patterns, but are easily adaptable to the SFSP meal pattern and good for inspiration!

[Vermont New School Cuisine Cookbook: Nutritious and Seasonal Recipes for School by School Cooks](#)

[Fresh From the Farm: The Massachusetts Farm to School Cookbook](#)

[USDA Standardized Recipes for Schools](#)

[Washington State Schools "Scratch Cooking" Recipe Book](#)

15. Question: Can we continue meal service into the summer?

Answer: Yes. Schools and Non-Profit organizations may use the Summer Food Service Program to feed children 18 and under throughout the summer months. However, there are a few additional administrative and application requirements when operating the SFSP during the summer months instead of during an unexpected school closure. If you are new to the Summer Food Service Program and you would like to continue operation into the summer, please reach out to Jamie Curley at (802)-828-2010 or [Jamie.curley@vermont.gov](mailto:jamie.curley@vermont.gov) with questions. The state agency will provide SFSP training for new and existing SFSP sponsors in May and June.

As referenced in the [School Nutrition Programs COVID-19 Frequently Asked Questions \(FAQ\) Volume 3](#), under question 12, USDA has granted Vermont's non-congregate feeding waiver and area eligibility waiver to remain in effect until June 30, 2020, or until expiration of the federally declared public health emergency, whichever is earlier. On April 27, 2020, USDA issued a nationwide waiver to extend the flexibility to operate under unanticipated school closure requirements until June 30, 2020.

USDA recognizes that there may be a continued need for these waivers and will assess the situation on an ongoing basis. USDA has authority to extend the nationwide waivers through September 30, 2020, should it be necessary. The State agency has urged USDA to extend the waivers through the summer months and will continue to do so.

16. Question: Will we be able to receive reimbursement for meals served until June 30th, even if school ends earlier in June?

Answer: On April 27, 2020, USDA released a Nationwide Waiver to Extend Unanticipated School Closure Operations through June 30, 2020. This means that sponsors may operate under current unanticipated school closure requirements, regardless of whether school is considered in session or not, until June 30, 2020.

17. Question: Are we required to conduct site reviews?

Answer: On April 9, 2020, USDA released [SP 11-2020, CACFP 06-2020, SFSP 05-2020 Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers](#) clarifying SFSP monitoring requirements during COVID-19.

If an SFSP site is only operating during the COVID-19 emergency, the SFSP sponsor must conduct the required review, but may elect to do so offsite. This [Unanticipated School Closure SFSP Site Review Form](#) may be used to complete this requirement without visiting the site. This is to be completed within the first 4 weeks of site operation.

18. Question: Has the USDA granted Vermont's waiver request to provide FFVP fruits and vegetables to children if the children are not present?

Answer: Yes, Vermont's waiver request has been approved. This means that schools with FFVP funds may now provide an additional fruit or vegetable item to children 18 and under when providing SFSP meals, regardless of whether the children are present to receive the meals. If children will not be present, please include a label or a message stating that the foods are intended for consumption by children age 18 and under. Please see the USDA's April 9th memo on the [Fresh Fruit and Vegetable Program during COVID-19](#) for more information on how the FFVP may be operated.