

# SY 20-21 SFSP-SSO

Q&A



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## OPEN VS. CLOSED

### 1. Under SSO/SFSP we have to feed ages 1-18, right? Or can we just serve as a closed-enrolled site to enrolled students?

The population served varies depending on the program selected:

- Open = Must feed all children ages 1-18 regardless of enrollment
- Closed-Enrolled = Feed a selected identified group of children (e.g. enrolled students only)
- Both = Have a mix of open sites and closed-enrolled sites.

### 2. If we switch to SSO/SFSP is it correct that we would feed all children or just our enrolled students?

If an SFA operates SSO/SFSP under an Open Site(s), they must feed all children ages 1-18, this means children attending their school and children from the community. If an SFA would like to serve only their enrolled students, they may operate as a Closed-Enrolled Site(s). Indicate if the site will operate as open or closed enrolled in the [Fall 2020 SFSP/SSO Waiver Opt-in Form](#) and on the site application in MyIdahoCNP.

### 3. What is a closed enrolled site?

During the pandemic, closed enrolled sites are allowed to operate in a school setting where an identified group of children can be served (e.g. serving enrolled students only).

### 4. While school is in session we are trying to feed in the cafeteria if safety allows.

**Administration would not like unenrolled students and parents coming into the cafeteria because of safety concerns. Would we be able to serve enrolled students in the cafeteria and offer grab-n-go for other children in the community?**

Yes, site may operate as an open site and provide meals to children in the community.

Alternatively, the school may operate a closed enrolled site to serve only enrolled children.

Please indicate which option will be implemented on the [Fall 2020 SFSP/SSO Waiver Opt-in Form](#).

### 5. Starting September 8, students will be in school five days per week and meals will be delivered to the classroom or students will pick-up in the cafeteria. If all sites are open, how do we address the parent pick-up for those families that are not in a brick and mortar school. Can we have dedicated school/sites that handle the curbside pick-up at a dedicated time?

Yes. Sponsors are able to set meal pick-up times for those sites offering grab n' go meals.

### 6. If I have 2 schools that are considered open sites, can I have different serving periods? One period to serve the community, the other to serve the students enrolled?

Yes. This would be allowable since it is an open site and all children in the community will be fed.

### 7. So, we could have some of our sites as open and some of our sites as closed sites?

SFA sponsors who are operating SFSP or SSO are able to operate both open and closed-enrolled sites.

### 8. Can we do serve at open sites and OVS at closed sites?

Yes

### 9. With closed enrolled sites, do we have to run them through the meal counting program or can we use a tally sheet/head count?

For closed enrolled sites, SFSP/SSO sponsors can utilize a tally mark as the head count for meals served for students. Sponsors must have a system in place to ensure program integrity is

being followed and to ensure only those in the selected identified group of children (e.g. enrolled students only) are served meals.

**10. Can we still sell a la carte items at breakfast & lunch if we are running a closed enrolled "in person learning" SSO?**

A la carte sales are allowable in the SFSP/SSO; however, the sponsor must consider food safety practices when selling foods to program participants taking into consideration how money will be transacted

**11. Can we operate closed enrolled while school is in session, and change to open in the event that schools close?**

Sponsors must decide whether they are going to feed only enrolled students in the district or operate as a community feeding site (ages 1 through 18). If schools close, sponsors can continue to operate their sites as they were initially approved. Sponsors cannot switch between open and closed sites repeatedly however if the need arises, contact the state agency.

### **SFSP / SSO SUMMER FEEDING**

**12. Please explain the difference between SFSP and SSO Benefits?**

The NSLP meal pattern is used in SSO and all meals are served free to children in the community. The reimbursement rate for SSO is paid at the free rate for NSLP or SBP, which is slightly less than the SFSP reimbursement rate. However, USDA entitlement is not calculated for lunch meals served under SFSP. Additionally, monitoring requirements under SFSP do not apply to SSO. For further information, refer to the *Fall 2020 Child Nutrition Program Comparison Chart*, available on the SDE re-opening website.

**13. What financial information do we include on the SY20-21 SFSP application? What we plan on doing for the fall and summer or just summer?**

The State agency is waiting on guidance from USDA.

**14. Do I need to keep running DC matching if we move to SSO/SFSP?**

Yes.

**15. If we start operation under SSO, can we switch to SFSP at a later date?**

Yes, SFA sponsors can switch from SSO to SFSP operation. However, SFA sponsors must wait and conduct the switch the next full month because a month's claim cannot be split between two programs.

**16. If I move to SFSP will my entitlement be based on last year?**

USDA has not provided guidance on entitlement during SY20-21.

**17. Clarification on SFSP monitoring waiver: If we opt-in to the waiver, do we have to complete a site review within the first four weeks or collect ethnic and racial data report? Or is it required in a different format for social distancing?**

SFSP Sponsors are still required to complete the appropriate monitoring requirements during operations. The Onsite Monitoring Waiver allows for SFSP sponsors to complete the monitoring requirements offsite (i.e. desk reviews).

**18. If we use our point of sale system in the SFSP to make sure we don't serve duplicate meals, do we still need to fill out the meal count forms required for SFSP?**

No. Sponsors are not required to use the State agency provided meal count forms.

**19. If we start SFSP/SSO now do we use the start date of September 2020?**

The State agency opted-in to Nationwide Child Nutrition Responses #48-56 allowing sponsor participation in the Summer Food Service Program (SFSP) and Seamless Summer Option (SSO) to begin on **September 1, 2020**. While operating under this waiver, claims must be submitted through the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO).

**20. If we opt in for SSO and do our monitoring review in December but funding happens to end in October, will we still be okay doing our monitoring in Dec-Jan? Or do we need to move up our plan and the repeat when SSO ends?**

SSO monitoring requirements must be completed prior to ceasing operations. Currently, USDA states that sponsors may operate under SSO until funding runs out or December 31, 2020. If operations end December 31, 2020, the sponsor will return to NSLP in January and must complete their NSLP on-site monitoring review prior to February 1, 2021. The State agency will contact USDA for additional information regarding monitoring requirements.

**21. Can we operate SFSP/SSO while schools are in session? Many enrolled students are over the age of 18.**

Yes, the COVID-19 Response #56 allows for SFSP and SSO sponsors to operate through December 31, 2020 or until funding runs out. For both SFSP and SSO, sponsors operating Open Sites must serve all children ages 1-18. A person 19–21 years of age, who has a mental or physical disability (as determined by a State or local educational agency) and who participates during the school year in a public or private non-profit school program (established for the mentally or physically disabled) is also eligible to receive meals.

**22. Just to confirm, to serve SFSP/SSO we don't have to be in an unanticipated closure.**

Correct, sponsors do not need to be in an unanticipated school closure in order to operate SFSP/SSO.

**23. We are a 4-day district. Can we serve meals for 5 days?**

If you are operating SFSP or SSO, yes, you can serve meals for 5 days to all children ages 1-18.

**24. Under SSO/SFSP can we serve breakfast and lunch per student each day, so claiming 2 meals, or only claim 1 meal?**

Under the newly released waivers, SFA's can serve both breakfast and lunch just as you did in the spring. SFAs will claim both those meals served so long as you have indicated both meals are being served in your SSO or SFSP packet in MyIdahoCNP and have opted into the waivers.

**25. Would August meals be claimed under NSLP?**

Yes. Meals served in August must be claimed under NSLP.

**26. I have been charging student's according to their eligibility. If we are able to go back to September 1, 2020 on our SSO/SFSP claim, will I need to reverse charges to the students who have been paying out of pocket?**

Yes.

**27. It looks like the rate difference between SFSP and SSO is about \$0.25. How much are we credited per meal for USDA foods?**

During SY19-20, sponsors were credited \$0.3625 per lunch meal for USDA foods under SSO and NSLP.

**28. The summer rate is operating \$3.76 per meal. Do we not get the .3925 per meal administrative rate?**

Yes, however the Administrative reimbursement under SFSP varies between Rural/Self-Preparation sites and Vended/Urban sites. The Administrative reimbursement rate will depend upon the sponsors program operations.

**29. Will choosing SFSP or SSO affect our severe need calculations in the future?**

The State agency is waiting on guidance from USDA.

**30. Do we still receive the .07?**

The Meal Performance Reimbursement (extra 7 cents) will be paid under the SSO program.

**31. It looks like the SSO reimbursement rates went up 10 cents! Can you confirm?**

The lunch meal rate did go up by 10 cents. The breakfast meal rate went up 5 or 6 cents, depending on the reimbursement category the district receives.

**32. It was my understanding we did not have to have the Idaho Rebound documentation turned in until December.**

The absolute deadline that the State has to close out the funds is December 11, 2020.

Reimbursement requests must be submitted as soon as possible to ensure we can complete our reports by the December deadline.

**33. If we are CEP what would be the advantage, do we go back CEP after Dec.**

All the meals served through the Seamless Summer Option are reimbursed at the free rate.

Under CEP, your reimbursement rate is calculated with your ISP. If you stay on CEP, you will have a percentage of meals claimed as free and the rest will be claimed as paid. (Example: ISP = 40% > 64% of meals will be at the free rate and 36% of meals will be claimed at the paid rate). Under SSO/SFSP, 100% of meals are claimed at the free rate.

**34. If we don't qualify for SFSP, can we utilize the new flexibilities to serve all students free?**

If the SFA does not qualify to operate under the SFSP, they may be eligible to operate the SSO. SSO permits sponsors to serve free meals to children aged 1-18.

**35. If we want to add a school that has not previously operated as a site, but is a K-8 building, do we need to add the additional site or can we combine it with the elementary school site?**

Please contact the State agency as we need additional clarification.

**36. We are doing SSO and we have teachers that eat but we are running them through the POS. My question is do we put them on our daily meal count sheet we are using for students?**

As long as your production records reflect the total meals served to both students and adults, each SFA can determine where you enter them. Remember, adults cannot be claimed for reimbursement and must be charged the adult meal price.

**37. Is the text number still active to help our remote only families locate an SSO/SFSP curb side pickup site? If so what is that number please?**

Text "Summer Meals" to 97779. This is only for open sites under SFSP.

**38. Do we still need to charge for extra milk when operating under SSO or SFSP?**

Under SFSP/SSO, sponsors may continue to charge for a la carte milk for students bringing their own meals from home. However, sponsors must track this purchase accurately to reflect a la carte sales versus unitized meals served to participating children. To limit risk to both students and staff, be mindful of food safety and proper cash handling protocols.

**39. If our kitchen was closed due to COVID, is that considered an operating day?**

If meals were not served, it would not be considered an operating day.

**40. Can meal count forms be used in SSO instead of entering students individually in the automated POS system?**

Yes, however to ensure program integrity the production records should match whatever meal count sheet sponsors are using. Adult meals must be accounted for but cannot be included in the claim.

**41. Do we need to send out letters to the families when their status changes?**

Only if the household has submitted a free and reduced application for school year 20-21.

**42. Is the 30-day carryover calendar days or school days?**

School operating days, this should include virtual learning days.

**43. Can a sponsor who operates 4 days a week and chooses to transition to SSO with a closed enrolled site, serve meals on non-school days?**

Yes. SSO sites may operate on non-school days.

**44. Is a POS review (as required by NSLP) still required when operating SFSP?**

The POS review is a NSLP requirement and is not applicable under SFSP; each program has specific monitoring requirements. The State agency plans to offer additional instruction on the next Town Hall meeting scheduled for November 18, 2020.

**45. Do we need to do anything in MyIdahoCNP to use the updated SFSP rates?**

The updated reimbursement rates for January through December 2021 are for sponsors operating the Summer Food Service Program. The 2021 rates will be automatically applied in MyIdahoCNP to all SFSP claim months starting January 2021. School year 2021-2022 NSLP\SSO claim rates will be released after July 1<sup>st</sup>, 2021.

**46. Do SFAs operating SSO need to request a 2nd health inspection?**

SSO is an extension of the National School Lunch Program (NSLP), therefore two health inspections are required. Additionally, since SSO is an extension of NSLP, health inspections under SSO is an allowable cost. Only those sponsors participating in SFSP are eligible to receive health inspection reimbursement funds.

**47. Do SFAs who operated a summer program during 2020, but do not plan to participate in a summer program during summer 2021, need to complete any forms?**

SFAs must complete the *Summer 2021 SFSP/SSO Waiver Extension Form* and **opt-out** of the extension waiver. [Summer 2021 SFSP/SSO Waiver Extension Form](#)

**48. What are the SFA monitoring requirements for SFSP sites that will continue operating into summer 2021?**

During FFY21 (October 1, 2020 – September 30, 2021), any site that operated under the Nationwide waivers should have completed monitoring requirements if the site operations started in October 2020. Since June, July and August 2021 fall within FFY21 additional monitoring requirements are unnecessary.

**49. What are the SFA monitoring requirements for new and returning SFSP sites that did not operate during school year 20-21?**

A sponsor planning on operating a new site in summer 2021, that did not operate previously, must complete a pre-operational, first week site visit, and fourth week review for each site. Returning sites that experienced operational challenges identified during the sponsor site monitoring visit must also complete a pre-operational, first week site visit, and fourth week site review. All sites are required to complete the racial and ethnic data report and have until the end of each sites' operation to do so.

**50. What are the rules for operating an open summer site under SSO?**

Operating an open SSO site during summer 2021 is allowable, however specific waiver flexibilities must be addressed to ensure operations are compliant. Please contact the State agency directly for a review of those waiver flexibilities.

**51. Are SFAs required to operate SSO or SFSP for summer?**

The decision to operate during the summer is a local decision. There is no requirement to operate a summer meals program.

**52. Can SFAs operate short term learning camps over the summer at sites that are not approved SFSP sites and deliver lunches from an approved SFSP site?**

More details on this particular question are necessary, therefore, please contact the State agency directly for a thorough review of the operational plan.

## **MONITORING**

**53. Do I have to complete an SSO on-site monitoring review when I only have one site operating?**

Yes, SSO operations require a review at every site. The *Seamless Summer On-Site Checklist* form can be found in Download forms in MyIdahoCNP. The State agency provided additional instructions, *SSO On-Site Monitoring Requirements*, which can be found in Download forms.

**54. We started SFSP operations in September and completed the Pre-operational, First Week, and Site Review for all of our sites. Do we need to do this again in October?**

No, if the Sponsor completed the Pre-operation and First Week site visit in September, they do not need to be completed again in October. However, October 1<sup>st</sup> begins the new federal fiscal year, therefore, the Site Review must be completed again within the first four weeks of October for all sites.

**55. How can Racial and Ethnic data be collected for sites where meals are distributed to multiple classrooms?**

The Racial and Ethnic Data must be completed prior to the last day of site operations. Sponsors may utilize other staff or classroom teachers who are assisting the meal service to complete this requirement. Sponsors must ensure adequate training is provided to any person assisting in the collection of the Racial and Ethnic data, including Civil Rights training. For Closed-Enrolled sites, Sponsors may utilize Racial and Ethnic data collected by the individual schools where the meal service is being provided.

## **MEAL PATTERN**

**56. How do we get our waiver back to change it? We will not be able to meet sodium guidelines this year due to our bids already being approved.**

SFA's are unable to modify previously submitted requests. If changes need to be made, please submit a new opt-in form. The State agency will refer to the most current submission, therefore, SFA's should include all needed flexibilities in each submission.

**57. Will you please verify which target Sodium Level we are at right now?**

We are currently at Target Level 2.

**58. Are sodium levels different if we operate a 4-day week?**

No, sodium is a weekly average. The average is the same regardless of how many days meals are provided.

**59. White milk can be 1% or fat free but flavored milk is non-fat only, is this correct?**

Correct.

**60. Do we still need to have potable water available in the cafeteria?**

Yes, however the State agency has submitted a potable water waiver. Once we receive a decision from USDA, the State agency will inform all Sponsors. Potable water is not a requirement in non-congregate settings (i.e. grab n' go or meal delivery).

**61. Do all vegetable sub-groups have to be offered throughout the week since the meal pattern under the current flexibilities is NSLP?**

Yes. Current USDA flexibilities require SFAs to follow the NSLP meal pattern which includes meeting the minimum requirements for vegetable sub-groups over the course of the week.

**62. Will there be flexibility to meet vegetable subgroups?**

The USDA *Nationwide Waiver to Allow Meal Pattern Flexibility* waives meal pattern requirements so long as the need is "targeted and justified based on plans to support access to nutritious meals while minimizing potential exposure to COVID-19". Examples for vegetable sub-group flexibility could include lack of product, exorbitant pricing, or other unforeseen events (e.g. product delivery issues due to COVID-19).

**63. Do we still need to follow the different age grade group meal patterns if we are offering meals from one location?**

Yes. Unless the SFA opts in to the *Nationwide Meal Pattern Flexibility Waiver*, which can be located on the [SDE Reopening webpage](#).

**64. Does the meal pattern flexibility allow for fruit and veggie portion sizes to be provided in minimum amounts? (High school to receive 1/2 cup portions).**

If an SFA opts in to the *Nationwide Meal Pattern Flexibility Waiver*, it allows for sponsors to request specific exemptions that are targeted and based on justified need. The State agency will take these requests on a case-by-case basis.

**65. Since meals were served under the NSLP meal pattern, prior to transitioning to SFSP meal pattern and would not fit the NSLP meal pattern. What happens to those meals served?**

When transitioning between programs, sponsors may need to submit an *SY20-21 Meal Pattern Flexibility Waiver Form* in order to claim the meals under the corresponding program.

**66. If we opted in to SFSP but started the month out for NSLP do we need to opt in to the meal pattern waiver or will the NSLP meal pattern meet the SFSP requirements for the September claim?**

Look at the meals served prior to transitioning and receiving approval to operate SFSP. If the meals served do not meet the SFSP meal pattern requirements you will complete the meal pattern waiver request form that was included in the approval letter for the *Fall 2020 SFSP/SSO Waiver Opt-in Form*

**67. SSO meal pattern 1 cup fruit for both breakfast and lunch?**

It depends on which age-grade group you are serving. SSO sponsors must follow the NSLP meal pattern.

**68. In SFSP, when serving a unitized meal are we able to provide an option to choose the entree?**

Yes, as long as you are following the meal pattern.

**69. Can we get more information on the 2012 meal pattern? Just to clarify, we will need to follow that pattern now until when?**

The State agency asked USDA for additional guidance on this, however our current understanding is that since the SSO follows the SBP/NSLP meal patterns, the 2012



requirements would need to be followed in SSO. That means:

- Flavored milk may only be fat free
- All grains must be whole grain rich
- Average sodium across the week must meet target 2 limits

**70. How do we follow the meal pattern if we are only operating 4 days a week?**

The 4-day meal pattern for NSLP/SSO is available under Download Forms in MyIdahoCNP.

## **MEAL DISTRIBUTION**

**71. Under a "serve" scenario, we are forced to purchase individual to-go containers and lids for each food group which has significantly increased costs - what is the best way to proceed with waivers (must we request to exclude an entire food group)?**

While packaging concerns can be a justification for a meal pattern waiver, a request to exclude an entire component would require supplemental documentation for State agency review prior to approval.

**72. We are implementing a pre-ordering system and would like to require households to order both a breakfast and lunch together for ease of packaging and delivering; is this allowed?**

No, per 7 CFR § 210.10, students must be offered a meal and are not required to take two meals.

**73. When considering lunch deliveries, is buying something to keep some items warm and some items cool, an allowable cost?**

Yes, it is reasonable to purchase equipment to maintain food safety following proper procurement procedures. If the SFA plans to purchase items costing more than \$5,000, a Capital Expenditure Request must be submitted and prior State agency authorization is needed.

**74. Is there is a current waiver to send home meals for multiple days?**

Yes, when used together both the Nationwide Waiver to Allow Meal Service Time Flexibility and Nationwide Waiver to Allow Non-congregate Feeding permit meal delivery for multiple days.

**75. What will our serving lines look like this school year?**

Meal service plans should be developed by each SFA in conjunction with their local administration following CDC and regional health department guidance. While USDA has not provided explicit requirements for operating in the fall, sponsors have the ability to use flexibilities issued by USDA.

**76. Will we be required to have grab and go items to make up a reimbursable meal?**

Grab n' go meal service style is an option but not required at this time.

**77. Are students allowed to pick up their breakfast in the cafeteria and bring the meal to their classroom?**

This is an option but not required. The State agency encourages sponsors to work with their administration when developing a meal service plan.

**78. Will we have flexibility in serving the meals at a different time for pick up?**

Yes, so long as the sponsor has opted in for both the *Nationwide Waiver to Allow Meal Service Time Flexibility* and *Nationwide Waiver to Allow Non-congregate Feeding*.

**79. During the school year, will meal service only be allowable for attending students and no other community children?**

Under the current USDA flexibilities, meal service is allowed to include only those students enrolled in your district.

**80. During this school year 2020-2021, can we set up a grab & go for students learning online from home and can their parents come pick-up the meals?**

Yes. Under the current USDA flexibilities, multiple meals service styles, including grab & go for enrolled students receiving distance instruction on the day of the meal service is allowable. As long as the district has opted-in to use the *Nationwide Non-congregate Feeding Waiver*, the district may request the *USDA Nationwide Waiver to Allow Parents and Guardians to Pick up Meals for Children*. The State agency may approve the request if the district has processes in place "to ensure that meals are distributed only to parents or guardians of eligible children (enrolled in the school) and that duplicate meals are not distributed to any child."

**81. If a parent picks up a meal for their student, will they be charged according to their student's benefit status?**

Yes. Student eligibility will need to be considered in an SFA's plan for meal distribution. A parent picking up meal(s) for their student(s) will need to be aware of their student's eligibility determination and meals will be charged accordingly.

**82. For SY20-21, SFAs must operate the NSLP program which means that any meals we offer students get charged based on a students determined eligibility.**

As of July 23, 2020, this is correct.

**83. Once our meal service plan is in place, do we need to opt-in to the SY20-21 waivers that apply? Or do the waivers we opted-in to and were approved for under SSO still apply?**

Operating the Seamless Summer Option (550) is not allowable for the upcoming school year. Each SFA must notify the State agency which waiver flexibilities will be utilized in their meal service distribution plans under the NSLP and/or SBP only.

**84. Can children who are home sick from school still receive meals?**

Students who are home sick and are not participating in instructional time (i.e., distance/online learning) would not be eligible to receive a meal, however during SY20-21 in response to this pandemic, if a student is isolating at home due to exposure, and participating in instructional time, they can receive meals. Work with the health department in your area to ensure everyone has limited exposure to illness.

**85. Our district is operating 4 days a week this year, so I can only serve them meals on school days, right?**

Correct. Under NSLP, meals can only be served on school days.

**86. If students are required to self-isolate can the parent still pick up meals?**

Work with the health department in your area to ensure everyone has limited exposure to illness. If a student is isolating at home due to exposure, and participating in instructional time, they can receive meals.

**87. Can you do curb side pick-up on non-school days? Monday will be an online learning day and students will be onsite Tuesday-Friday.**

Meals may only be provided to students on days when students are receiving instruction (either in-person or via distance learning).

**88. If a student in the classroom tests positive and those who came into contact with the student are required to self-isolate, could they still pickup meals?**

If a student who is self-isolating is receiving instruction, they are able to receive meals. However, be sure to have safe-guards in place to protect staff from exposure to illness while providing

meals. Contact your health department for guidance.

**89. If we have a few families who are at work and can't pick up meals and the busses only go to certain spots can we personally deliver to the homes?**

The State agency will request guidance from WRO on this particular scenario.

**90. Our district is open 4 days a week to students at brick and mortar but, one day a week on Wednesday's online. Can we still serve them on the online day which, is Wednesday?**

Yes. During SY20-21 in response to this pandemic, students who are enrolled in a brick and mortar site who are also receiving online instruction can receive meals for all school days.

**91. If we are serving preordered grab and go sack meals which will be delivered to each classroom so that teachers can hand to the appropriate students, does each classroom have to have a civil rights poster?**

No. The "And Justice for All" poster can be placed in an entryway, rather than each individual classroom.

**92. If teachers are handing out pre-ordered sack meals to students in the classroom, does the teacher need to complete civil rights training?**

Yes. Teachers will need to complete the one-page Civil Rights training which is available in the download forms section of MyIdahoCNP. Make sure that each teacher acknowledges they have completed the training via a sign-in form.

**93. How do we handle the milk variety requirement, under NSLP meal pattern, for preordered grab and go sack meals considering the meal will be unitized and the same for all students?**

The State agency has submitted a State level milk waiver and is waiting for USDA's approval or denial of the request.

**94. Are SFAs required to offer a variety of milks? We plan to serve 1% milk in each sack lunch.**

The NSLP meal pattern milk variety requirement has not been waived; however, the State agency has submitted a state level milk waiver and is waiting for USDA's approval or denial of the request.

**95. If we were to offer a grab and go for unenrolled students, can we have the parents call in and order by a certain time instead of just being open for a period of time?**

No. Meals must be available to all children ages 1-18 during their meal service.

**96. Can we send multiple days of meals at grab n go sites?**

Yes. Sponsors must opt-in to the appropriate waivers. Additionally, the sponsor must include an integrity plan with appropriate measures in place to ensure that program accountability is maintained and that duplicate meals are not distributed to any eligible child or adult participant.

**97. If we are serving in the cafeteria versus outside grab and go, would it be a new site?**

No.

**98. Can we deliver meals on busses like we did in the spring?**

Yes. The sponsor must opt-in to the appropriate waivers. To opt-in, sponsors must first complete the *Fall 2020 SFSP/SSO Waiver Opt-in Form*. Sponsors will then complete their Attachment A and follow the instructions provided in the broadcast email sent on September 4, 2020.

**99. If food service staff need to be quarantined, is halting meal service allowable even when school is in session? Should sponsors update the *Fall Meal Service Plan*?**

Each school district and situation are unique; therefore, each plan should address individual school needs. Please work with the health department and district administration to review and update the meal service plan. Halting food service may be necessary if food service staff or students are at risk. Revised plans can be uploaded into the MyIdahoCNP Attachment List.

## **OFFER VERSUS SERVE**

### **100. Are we allowed to serve OVS in the cafeteria for students present and for the students that are remote learners are we able to give them a unitized meal?**

OVS is an option but the USDA *Offer Versus Serve Flexibility Waiver for School Year 2020-2021* waives the requirement for High School. If sponsors are unable to implement OVS and ensure appropriate components and serving sizes are met, a unitized meal that includes all meal components in the full amount must be served.

### **101. If we are serving OVS in the building between 11-12pm, can we serve a unitized meal that follows the NSLP meal pattern for the remote learners from 10-11am?**

This is allowable, as long as the unitized meals meet the appropriate meal pattern, including the full portions for each meal component, for the program the meals will be claimed under (SBP or NSLP). Depending on which meal is served, the *USDA Nationwide Waiver to Allow Meal Time Service Flexibility* may be needed. Remote learners picking up meals would require the *USDA Nationwide Non-congregate Feeding Waiver* as well.

### **102. If my plan is to serve in the classroom and not OVS, do I need to apply for a waiver?**

Depending on meal service times for providing meals in the classroom, SFAs may need to request the *Nationwide Waiver to Allow Meal Service Time Flexibility*. Additionally, if the students being served are high school students, then it is necessary to request the *Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools*, as under normal operation, OVS is a requirement when serving high school students.

### **103. Can I use OVS meal service in some schools and not in others?**

The *USDA Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in NSLP for SY20-21* was issued so SFA's could forgo the OVS requirement for high school students. If SFAs do not want to implement OVS, they must serve all meal components in the full portion size for each grade group being served.

### **104. Does the OVS waiver allow us to serve a reimbursable sack lunch on digital learning days (e.g., A/B schedules)?**

No. The *USDA Nationwide Non-congregate Feeding Waiver* allows SFAs to serve reimbursable sack lunches for students participating in an online learning day. The *USDA Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in NSLP for SY20-21* was issued so SFA's could forgo the OVS requirement for high school students. If SFAs do not want to implement OVS, they must serve all meal components in the full portion size for each grade group being served.

## **ONLINE LEARNING**

### **105. 4-day school week: If we have afterschool on Friday for part of the day, can we provide meals for those students who come to that program on that day?**

SFAs operating under a 4-day school week, can only serve NSLP or SBP meals for those 4 school days. A district may apply to participate in the CACFP At-Risk Afterschool program on

non-school days during the school year if the school(s) offer an afterschool program with educational enrichment activities. In the CACFP At-Risk Afterschool program, up to one meal and one snack may be served and claimed per student per day. Please contact Kim Sherman at [ksherman@sde.idaho.gov](mailto:ksherman@sde.idaho.gov) for more information about the program.

**106. If we go into a hybrid a/b day schedule, are we able to send meals home with students?**

Yes. The USDA *Nationwide Waiver to Allow Meal Time Service Flexibility* allows SFAs to distribute multiple meals at one time. This waiver, in conjunction with the USDA *Nationwide Non-congregate Feeding Waiver*, allows SFAs to send meals home with students.

**107. Our district has scheduled one day as a digital learning day each week. Would we use the meal count sheets to keep track of the meal counts for reimbursement?**

SFAs must have a process in place to ensure students are not receiving duplicate meals on the digital learning day. SFAs must keep track of the meals served to students each day a meal is provided as proof that the meals should be reimbursed.

**108. If our district goes to A & B days and students on opposite days participate in online learning, can we send meals home for the next day and claim them for reimbursement?**

SFAs may claim meals as long as there is a plan to keep the meals safe and they are provided to enrolled students. Each SFA must have a way to keep track of the meals served for these online learning days.

**109. If we go to an A/B schedule, our superintendent wants us to serve lunch to the kids that are there as "A" day kids and provide a pickup lunch to the kids that are "B" day kids. Is this allowed?**

Yes. The current flexibilities provided by the USDA Nationwide Waivers allow SFAs to serve multiple meals to students in a non-congregate setting.

**110. Do we need to write a request to the State Agency to send meals home for students who are distance learning under A/B schedules?**

No. So long as the SFA has opted into the applicable USDA Nationwide waivers on the *SY20-21 School Meals Waiver Opt-In Form*.

**111. Can students that choose to learn from home still pick up a lunch from school?**

The State agency (SA) is waiting for further guidance from USDA for all online students. Currently, the definition of a school that USDA uses assumes a physical building, which is why students of virtual online schools have not historically been eligible to participate in school meal programs. The SA expects USDA to issue further clarification outlining the details of serving meals to students who are not physically present.

**112. Are students who are participating in digital homeschooling full time, allowed to pick up a meal from school?**

The State agency posed this question to USDA on a call earlier this week and we are waiting further clarification. We do know that children who are enrolled in a school building and are receiving temporary remote learning as a response to COVID-19 are eligible for meals.

**113. Can we put lunch and breakfast in the same bag for children doing online schools?**

The *Nationwide Waiver for Meal Time Flexibility* allows SFAs to serve multiple meals at one time to students. However, keep in mind that there needs to be a way to identify the students as enrolled in a brick and mortar site. The definition of online learners (distance) is different than a student attending a virtual school site. Currently USDA guidance does not allow for meals to be served to virtual school students who are not enrolled at a brick and mortar site.

**114. Our Superintendent has explained to me that our Virtual School is not a separate school, no ID associated with that school, as students are still associated with their brick and mortar building. More and more families are enrolling in the 'virtual' school. I am not clear if we can feed them due to the definition of virtual.**

During SY20-21 in response to this pandemic, students who are enrolled in a brick and mortar site who are also receiving online instruction can receive meals for all school days.

**115. If we end up doing online learning, how do we serve meals to our students that are throughout the state of Idaho?**

The State agency is awaiting further guidance from USDA on this situation.

## **P-EBT**

**116. How does the P-EBT program benefit school districts?**

P-EBT program is a benefit for families who have children eligible for free and reduced-price meals in schools operating hybrid or at home learning models that did not have access to USDA school meals.

**117. Can school districts post a notification on the district website to advise community members who are interested in receiving P-EBT payments that they need to complete the USDA Household Application for free and reduced-price School Meals?**

The State of Idaho P-EBT payment implementation plan has not yet been approved by USDA. Once SDE receives notification that the Idaho plan is approved, SFAs will be advised via broadcast email. At this time, districts can post an announcement about the benefits that would be available if the P-EBT plan for Idaho is accepted and approved by USDA so that families are aware of the benefit of completing a free and reduced-price application.

**118. Is there a timeline requirement for families to complete an application and qualify for the P-EBT benefits?**

The Idaho P-EBT implementation plan has not been approved by USDA. More information will be provided once the Idaho plan is approved.

**119. Can SFAs encourage families to complete a free and reduced-price meal application in anticipation of receiving P-EBT benefits?**

Yes.

**120. What is the qualifying date for P-EBT benefits? When would a free and reduced-price meal application have to be approved?**

The Idaho P-EBT implementation plan has not been approved by USDA. More information will be provided once the Idaho plan is approved.

**121. Is there a specific date of enrollment and free/reduced status under the current P-EBT program?**

The Idaho P-EBT implementation plan has not been approved by USDA. More information will be provided once the Idaho plan is approved.

**122. How will an SFA know if students are receiving P-EBT benefits?**

Benefits are being calculated based on the calendars that have been submitted to CNP. Benefit information will be available soon.

**123. Are P-EBT benefits only available to schools or do childcare centers (like Head Start) also qualify?**

Childcare P-EBT questions should be directed to the Idaho Department of Health and Welfare (DHW). Idaho CNP is only operating the P-EBT program for students enrolled in a school district.

**124. If students are not attending school on Fridays, are students eligible for a P-EBT benefit?**

Schools that are not operating on Friday each week due to COVID are categorized as “Reduced Hours of Attendance” which means the school qualifies for P-EBT benefits for those students. However, if a school normally operates on a four-day week schedule and students typically did not have access to school meals each Friday, then the school does not qualify for a P-EBT benefit. P-EBT benefits are designed to fill the school meals gap that resulted because of COVID related operations.

**125. What household address is being used for the students receiving P-EBT benefits?**

P-EBT benefits are being assigned to the household address provided in the Student Information System (SIS) at the school. Those addresses will be provided to DHW. Idaho CNP is not aware of any plans by DHW to change the addresses to mirror those in their SNAP records.

**126. Should SFAs encourage households to complete free and reduced applications (F/R) as part of the qualification process for P-EBT benefits?**

Yes. Completing F/R applications will help ensure eligible students receive benefits.

### **PARENT/GUARDIAN PICK UP**

**127. Can daycares pick up meals for multiple students?**

No, daycare providers are not guardians and therefore cannot pick up meals on behalf of students.

**128. We are doing regular meals at school and curbside pickup for virtual learners. Can I apply for an exemption for just the curbside meals?**

Yes, the SFA has control over how they would like to implement the waivers.

**129. There was some talk during the SFSP/SSO meals earlier this year about older siblings picking up meals for their younger siblings at sites/bus stops etc. Would this be an option?**

Yes. Parents, guardians, and siblings are allowed to pick-up meals on behalf of children so long as the sponsor includes an integrity plan with appropriate measures in place to ensure that program accountability is maintained and that duplicate meals are not distributed to any eligible child or adult participant.

### **NSLP SNACK PROGRAMS**

**130. Can you operate SFSP or SSO and the ASSP?**

UPDATED as of 10/14/2020 SPO1-2021: **Can the NSLP afterschool snack service operate simultaneously with SFSP/SSO?**

Yes. The NSLP afterschool snack service, which operates during the regular school year, may operate simultaneously with the SFSP/SSO during implementation of *Nationwide Waiver to Allow Summer Food Service program and Seamless Summer Option Operations through School Year 2020-2021 – EXTENSION*, October 9, 2020 <https://www.fns.usda.gov/cn/covid-19-response-59>. As noted in *SP 13, CACFP 07, SFSP 06-2020: Child Nutrition Program Nationwide Waivers: Questions and Answers*, issued April 11, 2020, <https://www.fns.usda.gov/cn/covid-19/nationwidewaivers-qas>, Program operators may participate in multiple Programs. However, in no circumstances may children receive more than the numbers of reimbursable meals allowed in each Program for which they are eligible. Although schools generally must operate the NSLP in order to operate the NSLP afterschool snack service, FNS recognizes that for the duration of operations

under the waiver, schools may be serving breakfasts and lunches through SFSP/SSO. Similar to the at-risk afterschool meals component of the CACFP, schools that are offering non-congregate meals may meet the requirement to offer an enrichment activity with the NSLP snack service virtually or in other non-congregate ways. See Question 18 of *SP 24, CACFP 13, SFSP 13-2020: Questions and Answers for the Child Nutrition Programs during School Year 2020-2021 – #5*, issued August 21, 2020, <https://www.fns.usda.gov/disaster/pandemic/covid-19/questions-and-answerschild-nutrition-programs-during-sy-2020-21>.

Previous guidance: No. ASSP is an NSLP program. Sponsors cannot operate NSLP and SFSP/SSO concurrently. An SFA can apply to participate in the CACFP At-Risk After School Program to serve and claim the snack. It is possible to serve a snack in the SFSP/SSO as one of the two meal services that sponsors may provide in SFSP/SSO. For example, lunch and snack.

**131. To offer NSLP after school snack I either have to remain NSLP or SSO, not SFSP?**

UPDATED as of 10/14/2020 per SPO1-2021: Yes, you may operate. Reference question 57

Previous guidance: No. You may only run ASSP while operating NSLP.

**132. If the district wants to begin an Afterschool Snack Program (ASSP), do sponsors apply in the NSLP packet?**

Yes, to begin operating ASSP, please update the School Nutrition Program (NSLP) Site Application(s) in the 2020-2021 Application Packet of MyIdahoCNP and submit for approval.

**133. What are the requirements for operating Afterschool Snack Program this year?**

Requirements for operating ASSP can be found on the SDE website at [Idaho School Nutrition Reference Guide](#), under the ASSP section - [Afterschool Snack Program](#).

Each ASSP must be reviewed by the school food authority (SFA) two times per year (referred to as an Afterschool Snack Review). The SFA must make the initial review during the first four weeks of snack service each school year. The second review can occur any time before the program ends or June 30th for year round schools. These reviews must assess each site's compliance with counting and claiming procedures, and with the snack meal pattern. The required review form is in MyIdahoCNP under Download Forms.

### **CACFP AT-RISK AFTER SCHOOL MEAL PROGRAM**

**134. Can a sponsor operate SFSP and CACFP to cover meals for kids that are in our care all day?**

*Per SP25-2020, CACFP 14-2020, SFSP14-2020 Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020*, SFA's and Non-SFA CACFP sponsors may operate the at-risk afterschool meals component of the CACFP concurrently with the SFSP/SSO. However, under no circumstance may children receive more than the number of reimbursable meals allowed in each Program for which they are eligible.

**135. Did you get any more info from the USDA regarding running SFSP and being able to run CACFP supper?**

Currently, school sponsors are able to run SFSP/SSO and CACFP congruently.

**136. Where do I sign up for CACFP for after school snack?**

Contact Kim Sherman at [ksherman@sde.idaho.gov](mailto:ksherman@sde.idaho.gov) or call 208-332-6935.



**137. Do we have to do all the CACFP training to operate the snack program?**

Yes

**138. Can we use the 2019-2020 eligibility data for area eligibility for the 2021-2022 school year?**

Area eligibility is approved for five years. The State Agency is waiting for guidance on new site area eligibility determinations for SY2021-2022.

## **FREE AND REDUCED APPLICATIONS AND VERIFICATION**

**139. Will we need to start verification?**

Yes. Verification officially starts October 1, 2020. A broadcast email was sent to NSLP sponsors on October 1.

**140. While operating the SSO/SFSP program until December 31st or until funding runs out, can we still collect free and reduced applications so that we have the eligibility status for families in January or when the program ends?**

Yes. Sponsors may continue to collect free and reduced applications to support the administration of Child Nutrition Programs. While operating on SFSP/SSO sponsors are not required to process applications.

**141. With running SSO/SFSP how would we determine a free and reduced percentage for our district since we won't be collecting forms?**

The State agency does not have a process for determining a free and reduced percentage when a district does not collect free and reduced applications. While operating on SFSP/SSO sponsors are not required to process applications, however they may collect applications to support the administration of Child Nutrition Programs.

**142. If we choose to operate SSO/SFSP, how does that affect the verification process?**

The State agency is waiting for further guidance from USDA on the process of verification for SY20-21. Until you hear otherwise, proceed with the verification process as in a typical year.

**143. If I am currently running NSLP but switch to SSO/SFSP will the free and reduced percentages be affected for other school programs that use this rate for grants, funding, etc.?**

Yes, it is possible that free and reduced percentages will be impacted.

**144. Should sponsors still be completing verification even if they are not currently operating NSLP?**

Yes. The State agency will send out instructions for completing the verification process via broadcast email.

**145. Should sponsors still be collecting applications? If sponsors don't have as many applications this year because of free lunch, will that affect programs our district depends on that go off of free and reduced percentages?**

Collecting applications while on SFSP/SSO is a local decision. If a sponsor receives completed applications from families, the sponsor is required to process it and determine eligibility. The impact on other federal programs (e.g. Title I) was addressed in question #5 of *SP01-2021 Nationwide Waiver to Allow SFSP and SSO Operations through School Year 2020-2021- EXTENSION – Q&As #2*.

**146. If a school district began the year operating NSLP and students used a portion or all of their carryover eligibility, does that status roll back based on the recent USDA announcement. How will that work for students who completed an application for 2020-2021?**

The State agency has submitted this question to USDA and is awaiting further guidance on expired 30-Day Carryover status.

- 147. Has any information been provided regarding eligibility rollover from the beginning of the year on free & reduced lunch eligibility? Is it still the 30 days as when we operated the NSLP, or since we are operating the SSO program, do the days roll over until we operate the NSLP next year?**

State Agency is still waiting for additional guidance from USDA on how the Q&A relates to 30-day carryover.

- 148. How will the 30-day carryover for free and reduced-price meal benefits be calculated for SY21-22? Does a household have to have an approved free and reduced-price application on file during SY20-21?**

The State agency has not received guidance from USDA regarding the 30-day carryover for SY21-22, however USDA is aware that SAs are waiting for further information.

- 149. Will SFAs begin operations as normal under NSLP, identifying students are free, reduced, or paid eligibility and offering traditional congregate meal models for school year 2021-2022?**

CNP has not received any guidance regarding SY21-22. If additional guidance is received from USDA, SFAs will be notified.

### **NSLP TRANSITION PROCESS TO EITHER SSO/SFSP**

- 150. Can I run as SSO/SFSP and NSLP at the same time or must I choose between programs?**

Sponsors may only operate SFSP or SSO or NSLP.

- 151. Can we start feeding under the SSO/SFSP rules even if we have started NSLP, before our packet approval?**

Yes, beginning September 1, 2020 SFA's may begin operating under SFSP/SSO waivers. Sponsors must complete and submit the *Fall 2020 SFSP/SSO Waiver Opt-in Form*. Once the sponsor receives the approval letter from the State agency, they must complete and submit their packets in MyIdahoCNP as soon as possible.

- 152. If we submitted a waiver for meal pattern flexibility in NSLP can we transfer our request for a waiver to SSO/SFSP. Or will we need to complete a new waiver?**

You will need to complete a new waiver. The link to the SY20-21 SFSP/SSO Meal Pattern Waiver Request Form can be found in the State agency approval letter.

- 153. Since we are operating NSLP right now- can we switch to SSO/SFSP for both face-to-face students and online students?**

Yes, you may switch to SSO or SFSP.

- 154. We have been on provision 2 breakfast since 04-05. If we choose to do the SSO/SFSP versus NSLP will it mess up my breakfast program? Will I have to do a new base year?**

No. Operating under SSO or SFSP will not impact provisional programs as long as you are not establishing a base year.

- 155. Is there an estimated time when we can expect approval letters so we can announce to students and parents that we are participating in the new program?**

The State agency opted in to the nationwide waivers on August 31, 2020 allowing for SFSP/SSO operations to begin on September 1, 2020. State agency approval letters will be sent out in the order they were received.

**156. If we served one or two days in September and have now switched to SSO/SFSP what do we do with the two days served under NSLP, what do we do with the claiming for the two days under NSLP already served?**

Contact the State agency (Melissa Cook) with any questions regarding claims while transitioning between programs.

**157. What if I made a mistake on one waiver flexibility?**

You may edit the responses submitted in the *Fall 2020 SFSP/SSO Waiver Opt-in Form*. In your confirmation email, you will want to click on the “edit the shared entry” link to update your responses:



## **MYIDAHOCNP AND CLAIMING**

**158. Where can I find the SSO application packet?**

MyIdahoCNP under the School Nutrition Program Area.

**159. What happens if I submitted my SFSP packet but decided I want to serve SSO because of USDA entitlement?**

Edit the responses submitted in the *Fall 2020 SFSP/SSO Waiver Opt-in Form* to reflect SSO. Once you receive your approval letter, you will be able to complete your site application in MyIdahoCNP.

**160. How do I update the SFSP application or SSO application in MyIdahoCNP?**

Current SFSP/SSO sites expire in MyIdahoCNP on September 30, 2020. If an SFA would like to operate in September, the SY2019-2020 application packet will need to be updated to reflect these operating dates. Operations for SFSP/SSO beginning October 1, will need to be rolled over to the SY20-21 site applications in MyIdahoCNP.

**161. Will you roll over all information for the new year packet for 20/21?**

Some information may roll over but not all. Sponsors must complete new SFSP or SSO site applications for SY20-21 to operate October 1, 2020 and beyond.

**162. Not all of our schools are in the SFSP Application Packet, the missing schools have not offered SFSP based upon eligibility.**

Sites ineligible based on program requirements are able to provide meals under SFSP if the sponsor opts-in to the appropriate waivers. In order to add new sites to MICNP, sponsors must first complete the *Fall 2020 SFSP/SSO Waiver Opt-in Form*. Sponsors will then complete their Attachment A and follow the instructions provided in the broadcast email sent on September 4, 2020.

**163. Is the reimbursement the same for SFSP and SSO?**

No, please refer to the claim rates listed in MyIdahoCNP.

**164. The extension guidance states SSO/SFSP through December 31, 2020, or until funding runs out. What happens if I serve meals and funding runs out before I submit my claim?**

The State agency is awaiting further guidance from USDA on the availability and use of funding for these extensions.

**165. Is there a different process to file a monthly claim with the SSO process we are now doing?**

In MyIdahoCNP, in the NSLP claim module – you will go to “Claim-SSO”

**166. Do we need to do a new set of SFSP training modules for 20-21 SY? Can we submit our SFSP20-21 application packet without a training date entered?**

Yes, you will need to do a new set of training modules. However, put in the spring training date to avoid errors when submitting applications. Upcoming 2021 training dates will be determined at a later date.

**167. I'm completing the SFSP 20-21 application and don't understand how to report the eligibility of sites. Can you explain this, especially how this is different from how I reported it for last year's application for September?**

Please contact the State agency with specific questions on site eligibility. A handout that was designed to assist sponsors in completing their SFSP application packets, including how to document close-enrolled site eligibility, is available under Download Forms in MyIdahoCNP.

**168. How long after the approval letter are we able to go in and add/edit our sites?**

SDE staff is working as quickly as possible to add approved sites. An email will be sent notifying sponsors when all approved sites are available in MyIdahoCNP. Instructions for completing the SFSP and SSO packet are located in Download Forms.

**169. Can I fill out the application in MyIdahoCNP for SFSP for 2020-21 before my 2019-20 app is approved?**

Yes, sponsors can begin working on some components of the application packet. However, the site application packet may not include all operating sites until approved by SDE staff.

**170. How do we know which coordinator is working on our opt-in form?**

Email Child Nutrition Programs group at [childnutrition@sde.idaho.gov](mailto:childnutrition@sde.idaho.gov)

**171. Will our SFSP application packet in MyIdahoCNP roll over?**

The SFSP packets rolled over on September 3, 2020. All information that was contained on the 2019-2020 packet up through September 3, 2020 was transferred to the 2020-2021 packet. Any information that was added on the 2019-2020 packet after this date was not transferred, therefore sponsors must add the information on their 2020-2021 packet.

**172. During an emergency closure, when a school has been closed for a day or two, do we need to adjust the calendar in the SFSP application packet?**

SFSP site application calendars, for all meal types, must reflect actual days of operation when meals are served. Sponsors must check their site applications for accuracy prior to submitting a claim for reimbursement.

**173. Do SSO site applications need to be updated if site closures occur?**

SSO site applications are not as granular in detail as the SFSP site applications and do not contain the monthly calendar feature. However, SSO site applications should reflect the correct number of operating days which are entered under the Period of Operation section (Question #11) of the SSO site application in MyIdahoCNP.

## **NSLP**

**174. Who do we tell that we are staying in the NSLP?**

No action is needed if you choose to continue operating under NSLP.

**175. If we want to continue operating NSLP for now while we are in school as normal, will we have an option to switch to SSO/SFSP if we are suddenly out of school for an extended**

### **period due to COVID?**

SFA's do not have to be out of school to opt-in to the newly released waivers for operating SFSP/SSO. SFA's can continue operating under NSLP using flexibilities issued June 25, 2020. If an SFA decides to transition to SFSP/SSO, the transition must occur on the first serving day of the subsequent month.

### **176. We are operating under NSLP and are delivering meals to the classrooms. Do we have to use a roster or can we do a tally sheet/meal count sheet?**

You must use a roster. Under the NSLP, sponsors must charge for meals by student eligibility. Tally sheets would not be permissible since this method would not keep track of student name and eligibility. Tally sheets may be allowable under provisional programs so long as the sponsor has an edit check system in place.

### **177. Any changes to the NSLP AR? If we are scheduled for this year what does it look like for the future?**

The State agency is waiting on guidance from USDA, however, the State agency submitted a waiver to postpone administrative reviews for SY20-21.

### **178. Our district just started an online school and hired outside teachers. Students in the online school are not in our PowerSchool system. Do they qualify for the NSLP lunch program?**

If students are not enrolled by the district in a brick-and-mortar site within a school food authority, then they are not permitted to participate in school meal programs (NSLP, SBP, etc.). These requirements do not apply for open sites operated under SFSP/SSO.

### **179. Does the *CN Emergency Operational Costs Reimbursement Program* take into consideration student payments? The reimbursements for NSLP operators for SY19-20 would be less than payments under SFSP SY20-21, because of student paid meals.**

No, the USDA program uses specific calculations of reimbursement in each identified CN program and does not include a factor for student payments.

## **GENERAL QUESTIONS**

### **180. How do we know if we filled out all the waivers we needed to?**

The State agency sends out waiver notification letters as requests are reviewed and approved.

### **181. If we go to yellow stage which is A/B days, do I have to request a waiver to feed those students on the days they are not in school?**

Yes, when used together both the Nationwide Waiver to Allow Meal Service Time Flexibility and Nationwide Waiver to Allow Non-congregate Feeding permit serving students for days they are not physically at the school building.

### **182. Other than the meal pattern flexibility waiver, are other waivers automatic so districts do not need to opt-in for waivers?**

No. Districts must notify the State agency of the flexibilities that will be used in the meal service distribution plans. Additionally, the SFA may request the USDA *Nationwide Waiver to Allow Parents and Guardians to Pick up Meals for Children* only if they have a plan in place to ensure duplicate meals are not served to enrolled students. The State agency SY20-21 *Back to School Meal Service Plan Survey* sent via broadcast email to program contacts on July 8, 2020, asks SFAs to identify which waivers are under consideration. The State agency will be establishing a process to track waivers being utilized by each SFA.

**183. Do we wait until we have a food shortage before filling out the meal pattern waiver survey that was emailed to us?**

The *USDA Nationwide Meal Pattern Flexibility Waiver* allows for meal pattern flexibilities when a need arises, however the flexibilities go beyond food shortages. There are a variety of meal service considerations that may necessitate a school food authority (SFA) requesting meal pattern flexibility during school year 20-21. Any request for flexibility must be part of a "targeted and justified" approach to solving an existing and identifiable meal pattern problem that affects the SFAs ability to follow the NSLP meal pattern. Please review the Q&A for Child Nutrition Programs during SY20-21 - #5 available on the CNP reopening page of our website.

**184. If an SFA does not currently need to opt in to the Meal Pattern Waiver Request form, where can we find it in the future?**

The State agency is working to have a tile for opting in to *Meal Pattern Waiver Request Form* available on the CNP webpage. SFAs will receive notification when the tile is available for use.

**185. Thoughts on salad bars/condiment bars. I'm inclined to pull them, but there is some resistance.**

SFAs need to work with the local health department to ensure proper food safety practices are followed during the ongoing COVID-19 pandemic.

**186. Would you suggest we individually package fresh fruit & veggies for classroom for schools with FFVP program?**

SFAs need to work with the local health department to ensure proper food safety practices are being met. Many districts already have the practice of serving individually packaged FFVP items in the classroom. Pre-sliced and packaged fresh fruit and vegetable items are permissible. Pre-cut produce, ready-made produce trays, and nonfood items like serving bowls and plastic bags are allowable operating costs for FFVP.

**187. Will water still be required during lunch service?**

Currently, there is no flexibility for the requirement to provide potable water during meal services. The State agency submitted this question to USDA and it is under consideration.

**188. Is providing potable water during meal service still a requirement for NSLP in SY20-21?** The State agency submitted a waiver request to USDA for the requirement for the next school year, however at this time the waiver has not been approved

**189. Our district is purchasing a heat-sealing machine with CARES act money. Do we need to complete a capital expenditure request if that money will NOT be a line item in our child nutrition budget?**

If the equipment purchase is over \$5,000 and is reflected as a charge in the Child Nutrition Program Nonprofit Foodservice Account (Fund 290), then a capital expenditure request must be entered into MyIdahoCNP. If the purchase is not charged to the CNP account, then a request is not required.

**190. Can students eat outside as weather allows to encourage social distancing?**

Participation in the USDA School Meals Programs allows SFAs to feed students in multiple settings including outdoors.

**191. Will food service staff be required to wear masks during service of food this year or will this determination be made by our local health district?**

The State agency recommends following CDC and your local health district guidelines.

**192. Can a district refuse to accept cash payments and only allow people to pay on-line?** District's

must have alternate methods of payment for households with no internet access or those qualified for reduced price meals if an additional fee is charged for online payment processing. A processing fee would not be an allowable charge for reduced priced eligible students.

**193. Will reviews for SY20-21 be postponed until the following year?**

The State agency submitted a waiver request for administrative reviews for SY20-21, however at this time the waiver has not been approved.

**194. Are transportation costs related to bus routes/meal drop offs an eligible expense to claim for the rebound money?**

Transportation costs are an allowable expense in SFSP. Please complete the *Idaho Rebound Funding Questionnaire* sent via broadcast email on July 22, 2020 to assist the State agency in assessing sponsor needs due to budget impacts associated with COVID-19 operations. The State agency is currently working on the details of the funding guidelines.

**195. Is the fuel for feeding children via bus routes an allowable food service expense?**

Yes. However, the child nutrition program's budget must be able to bear this cost without jeopardizing food quality. School district's operating under Special Provision Programs must be aware that their district's general funds may already bear the burden of making the CNP budget whole at the end of each fiscal year.

**196. Are the fuel/bus expenses eligible for the emergency funding for COVID April/May?**

Please contact the State agency to discuss these expenses. It is possible that the school district already received reimbursement for the expenses through another funding stream which would preclude fuel/bus expenses from future reimbursement. The State agency can be reached by calling (208) 332-6800 or via email at [childnutrition@sde.idaho.gov](mailto:childnutrition@sde.idaho.gov).

**197. Where is the Central District Health Document?**

[Central District Health Department Guidance](#)

**198. When will we receive an approval letter regarding nationwide waivers we opted into?**

The State agency will be reviewing the waiver responses provided by each SFA which are due by August 14, 2020. Once reviewed, SFAs will receive a letter confirming the waivers they have chosen to implement. If an SFA does not receive a State agency response to the *Waiver Opt-In Form* by August 21, 2020, please contact [childnutrition@sde.idaho.gov](mailto:childnutrition@sde.idaho.gov).

**199. We have pushed our start date out do I need to change that in my NSLP application?**

Yes. Please update the NSLP Renewal Packet in MyIdahoCNP with any operational changes. Make sure to submit the packet once changes are made so the State agency can approve.

**200. Are the meals free to all students that normally pay or is it just students who are normally eligible for free meals? Snap/Direct Certification/Foster, Homeless, Migrant, etc.**

Per current USDA guidance, students are required to be claimed by their eligibility status and the meals must be available to all students.

**201. Do students need to pick up their meals from the building they are assigned to? For instance, one sibling attends the middle school and another attends the elementary school.**

SFAs must have a plan for ensuring meals are served only to enrolled students and that the meals are counted and claimed based on the student's eligibility status. During SY20- 21 in response to this pandemic, SFAs may serve out of a single (central) location, so long as they can retain program integrity by counting and claiming meals that are served to enrolled students only.

**202. If you serve out of a central location do you claim the students at their school site?**

Yes. Students must be claimed by student eligibility and school site.

**203. Do we need to send our SOP to the State agency and, if so, who do we send this to?**

The State agency has requested that all SFAs upload a copy of their school district's reopening plans, which should include specifics about meal service operations, into MyIdahoCNP under the SY20-21 sponsor packet *Attachment List*.

**204. We have a community Facebook page. Is it alright to post flyers to this site with just the short non-discrimination statement?**

As long as there is a link to the full non-discrimination statement on the document or Facebook Page, as illustrated in the handout provided with the webinar, SFAs can post documents to a Community Facebook page.

**205. Are townhalls or webinars conducted in person?**

Townhall events are conducted via Zoom. Webinars are held through GoToWebinar. The State agency sends out the link for registration to the events via broadcast email. Unfortunately, the broadcast email system only allows the State agency to send the information directly to the program contact listed in MyIdahoCNP so please make sure that the email is shared with other staff who may wish to participate. The [registration link for the webinars](#) can be used by any food service staff member, however keep in mind that the registration **confirmation** link cannot be forwarded to other staff after registering so each person who wants to attend must register individually.

**206. Any word on free and reduced applications and the effect on Title funds?**

The Title Program is a Federal Department of Education program and guidance should come from that department.

**207. Are all other Nationwide waivers good through the end of the school year?**

All approved Nationwide waivers are good for the duration of SY20-21. The only exception is the meal pattern waiver requests.

**208. Can you provide any information on the Federal stimulus money earmarked for CNP?**

The State Agency is awaiting guidance from USDA.

**209. Will SFAs be responsible for completing reimbursement calculations for the *CN Emergency Operational Costs Reimbursement Program*?**

The State agency (SA) will complete the calculations and provide them in a notification letter prior to release of any payment.

**210. Will SFAs be required to complete the Non-Program Funds Revenue Tool (NPFRT) during the upcoming application renewal period?**

The SA has not received any guidance from USDA regarding the requirement to complete the tool, however, we will seek guidance and send out notification via broadcast email once an update is received.

**211. Where can we view previously recorded CNP webinars?**

The webinar will be available on the CNP YouTube channel as a recording no more than ten days after the webinar. Webinars are located on the SDE YouTube Channel at <https://www.youtube.com/c/SDEIdaho/videos>

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1. mail: U.S. Department of Agriculture  
Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
2. fax: (202) 690-7442; or
3. email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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