

## COVID-19 School Closures & USDA Waivers

The Missouri Department of Elementary and Secondary Education (DESE) Food and Nutrition Services (FNS) office recently applied for two waivers from the United States Department of Agriculture (USDA) FNS. The waivers aim to support schools and communities in providing meals to children in areas experiencing school closures in response to COVID-19. Those waivers were approved Sunday, March 15.

Unanticipated school closure typically requires that meals served during this time period cannot be served at a school site. The **Meal Service During Unanticipated School Closures Waiver** allows a school site to serve meals during the closure through a summer feeding program structure.

Seamless Summer Option (SSO) and Summer Feeding Service Program (SFSP) require meals be served in a congregate (group) feeding setting. The **Waiver to Allow Seamless Summer Option (SSO) Meals in a Non-Congregate Setting** lifts that requirement, allowing non-congregate feeding. This means grab-and-go or meal delivery options would be available to schools.

Due to DESE FNS proactively applying for and receiving these USDA waivers, there are no forms participating schools need to submit. Schools planning to serve meals during a closure should complete our online form here: <https://modese.wufoo.com/forms/fns-meals-service-seamless-summer-option-sso/>, which asks each LEA to provide the following information:

- County/district code and LEA name
- Name and contact information for person administering meal service
- Site/location of meal service
- Summary of meal service procedures during the closure, including times meals will be served and how many meals will be served at those times (i.e. if you choose to distribute breakfast and lunch at the same time)

DESE FNS urges LEAs to clearly communicate meal service procedures and instructions to families through any and all available communication platforms. Additional information will be provided as we continue to monitor this situation. Updates will be provided on the [DESE FNS Disaster webpage](#). Please contact DESE FNS team members with questions at 573-751-3526 or [foodandnutritionservices@dese.mo.gov](mailto:foodandnutritionservices@dese.mo.gov).

### Frequently Asked Questions

**Q: Is there an actual waiver for the school to complete?**

A: No. DESE FNS has secured the two waivers listed above on behalf of schools.

**Q: Do we complete the waiver in anticipation of closing schools?**

A: There is no waiver the school district needs to complete. The school should determine that operating SSO or SFSP sites would be useful when schools are closed due to emergency situations or man-made disaster, such as a human pandemic. The Seamless Summer Application is available through the [DESE Web Application system](#).

### Quicklinks

- [Seamless Summer Option \(SSO\)](#)
- [How Can Schools Serve Meals During a Closure?](#)
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- [Disaster Assistance and USDA Donated Foods](#)

## Seamless Summer Option (SSO)

### **Q: What is Seamless Summer Option (SSO) and what are eligibility requirements?**

A: SSO offers school food authorities operating the National School Lunch (NSLP) or School Breakfast Program (SBP) a streamlined option for providing summer meals by continuing to follow several of the same operational requirements, such as the NSLP or SBP meal patterns and procedures for filing claims. To implement SSO, the requirements for site determination must meet eligibility requirements. In order for a school site to serve meals during an unanticipated school closure, they must do so under the SSO Programs. A school cannot serve meals from NSLP or SBP because it is not a school day.

## How Can Schools Serve Meals During a Closure?

### **Q: What are the eligibility requirements my school must meet in order to be eligible to participate as a meal service location for SSO and feed all children in the community age 18 and under? What is different for SFSP eligibility?**

A: Area Eligible requirement:

- On a first-come, first-served basis, serves all children age 18 and under at a site that is located within an area where at least 50 percent of the children are certified eligible for free or reduced price school meals based on school or census data.
- Meals are reimbursed at the appropriate NSLP or SBP free rates for all attending children.
- Site eligibility requirements are the same as SFSP.

### **Q: What do I do if my school is not eligible based on school data?**

A: Contact DESE FNS for guidance. If school data doesn't indicate the site has 50 percent or more free and reduced price students, the next option is to check Census Data. If census data indicates your school is area eligible your site is an approved open site. Use census data by accessing <https://www.fns.usda.gov/areaeligibility>. Print and maintain documentation that indicates the school site is located in the pink area of the census map.

### **Q: What is the difference between area eligible and closed enrolled?**

A: Area eligible means all meals are served free to all children 18 and under. The school may elect to offer an open meal service to all children in the community age 18 and under if the site is area eligible. Closed enrolled serves only an identified group of children through age 18 who are enrolled in the school site.

### **Q: When determining area eligibility of a school site to operate SSO, can the percentage of children eligible for free or reduced price school meals at another school in the same attendance area be used?**

A: Yes. For example, if a high school does not have 50 percent or more of their enrolled students eligible for free or reduced price meals, the school can look at other schools in the same area to qualify. If a middle school in the same attendance area has 50 percent or more of its enrolled students meeting the free or reduced price meals eligibility criteria, the high school could use the middle school to meet the area eligibility requirements for SSO. In other words, school sites establish area eligibility the same as any other site.

### **Q: If my school is district-wide Community Eligibility Provision (CEP) do I qualify for area eligible SSO?**

A: The site operating SSO must meet 50 percent or more free and reduced. Site eligibility is required if the site is a community eligibility school or is within the attendance area of a school using community eligibility. Use the product of the identified student percentage (ISP) multiplied by 1.6 for site eligibility purposes (i.e., the site's free and reduced percentage is  $31.25 \times 1.6 = 50$ ).

### **Q: If I have participated in SSO in the past, how can my school be quickly approved?**

A: Requirements that the School Food Authority (SFA) document that each site is serving an area that is 50 percent or more free or reduced priced eligible for existing eligible sites located in an area determined "disaster" will be waived if the school district has participated in SSO any time during the current year or in either of the prior two calendar years.

**Q: Will there be an application deadline to apply for SSO or SFSP?**

A: Complete the SSO application on the [DESE Web Application system](#). Schools applying for participation in the program due to an unanticipated school closure are exempt from the application submission deadline. Use the school site that meets eligibility requirements based on site type.

- Open: Located in an eligible area and open to all children through age 18 in the community
- Closed Enrolled: Located in an eligible area or non-eligible area that is limited to a group of enrolled children through age 18, of which at least 50 percent must be eligible for free or reduced price meals. Contact DESE FNS for guidance.

**Q: My school is area eligible. What are my options to apply for SSO?**

A: Complete the Seamless Summer Application on the [DESE Web Application system](#) or complete the online form: <https://modese.wufoo.com/forms/fns-meals-service-seamless-summer-option-ss/>, which request each LEA to provide the following information:

- County/district code and LEA name
- Name and contact information for person administering meal service
- Site/location of meal service
- Summary of meal service procedures during the closure, including times meals will be served and how many meals will be served at those times (i.e. if you choose to distribute breakfast and lunch at the same time)

DESE FNS will be entering the online forms received into DESE Web Applications. Instructions to complete the Seamless Summer Application through DESE Web Applications are as follows:

1. [DESE Web Application log in](#)
2. Click- Food and Nutrition Services
3. Click- Continue
4. Click- School Nutrition Programs
5. Click- Applications located at the top of dashboard
6. Click- Application Packet
7. Click- Seamless Summer located under Building Applications
8. Click- Add Building Application
9. Complete required information. In the comment box indicate the school food service meal distribution procedures.
10. Click- Save

**Q: Do I need to complete both the online form and the Seamless Summer Applications? Do I need to print the online form?**

A: No. Complete one or the other. If you have access to the DESE Web Applications please complete the application through the DESE Web Applications. If you complete the online form, DESE FNS will enter the information into DESE Web Applications. If you complete the online form, yes, please print and retain for your records.

**Q: If our district is shut down due to the virus, we can feed all enrolled students for free, right?**

A: If a current school does not have an approved agreement to operate SSO, they need to go through the process to complete the SSO application on the DESE Web Applications system. The school site must meet eligibility requirements to serve free meals. Contact DESE FNS for more guidance.

**Q: Who can I feed if my school is area eligible and I operate SSO?**

A: The SFA can offer meals to the community to feed children 18 and under during the unanticipated school closure due to COVID-19. Daily participation record must be retained for claim. SSO requires a public notice with information on the availability of free meals during the unanticipated school closure due to COVID-19.

**Q: Do I need to get an approval after I complete the SSO application or online form?**

A: No, if the site is area eligible go ahead and operate SSO, provided you have submitted an application or online form. If you are not sure your site is area eligible you must contact our office for additional guidance (573-751-3526).

**Q: What if my current school data indicates the school doesn't meet 50 percent eligibility requirements, but we operated a summer feeding program two years ago, do I qualify now?**

A: Yes. The school may be exempt from submitting new school data if the school participated in SSO or SFSP at any time during the current year or in either of the prior two calendar years. Any SSO sites that participate on the basis of area eligibility using school or census data are certified under that data for five years.

## **Meal Service Options**

**Q: Under SSO, how can I distribute meals? Who is eligible to receive home-delivered meals under SSO?**

A: The following sites may participate and may be located in schools or at non-school facilities: community building, park, bus route, neighborhood, car pick-up line, mobile feeding site, door-to-door delivery and other outdoor locations. The school must submit to DESE FNS a plan which includes the meal service plan that indicates method of delivery, meal service times and if school is electing to offer more than one meal at a time (i.e. breakfast and lunch or multiple days' meals at the same time). Schools operating an open SSO site in an area eligible location may deliver meals to all children in their eligible area and cover the meal delivery expense with non-program funds out of the school food service account.

**Q: Are there guidelines or do we just do the best we can to follow the guidelines and meet the components of a reimbursable meal?**

A: Meal pattern guidelines must be followed until further notice. Meals can only be claimed for reimbursement through utilizing the SSO or SFSP. SSO follows the same meal pattern as NSLP and SBP. SFSP follows the meal pattern according to CACFP. DESE FNS is currently exploring a meal pattern waiver through the recently passed Families First Coronavirus Response Act.

**Q: Can I use my Fresh Fruit and Vegetable Program (FFVP) grant funds to still serve FFVP during school closure?**

A: No. FFVP is under the NSLP. If the school is operating SSO during the unanticipated school closure, it doesn't allow for operation of FFVP. The items that have been purchased with FFVP funds may be used to prepare meals during unanticipated school closure. LEAs who used FFVP funds to purchase items that were not served in FFVP due to unanticipated school closure, but were instead used in the preparation of school meals must revise the FFVP claim. The FFVP claim must be revised to remove the food item purchased through FFVP that was used to prepare meals during the school closure. FFVP funds that are remaining at the end of the school year will be taken back and redistributed the following year. If you are concerned about not using all the funds awarded to your school, it is suggested to offer FFVP five days per week when school resumes after the school closure.

**Q: Must the child be present at the time of pick-up?**

A: Yes. A child age 18 and under must be present at the time of meal service. The intention of the SSO program is to ensure the child has access to the meal.

**Q: Can a school provide more than one meal to each child so that they don't have to come back each day? Can the school serve multiple days' worth of meals at one time?**

A: Yes. DESE FNS can approve a distribution approach that includes meals for multiple days. The school should consider the capacity to execute such an approach effectively, including meeting food safety requirements. Submit to DESE FNS a school meal service plan which includes times of meals and the distribution method. The Seamless Summer Application may be used to make a comment with your school meal service plan for COVID-19.

**Q: What is the number of meals I can serve under SSO? Can I offer a lunch meal and at the same time offer a breakfast meal that the student can take with them?**

A: Two meals for most sites, the same as SFSP. Options include breakfast, lunch, snack and supper. Lunch and supper cannot be reimbursed on the same day by the same site. DESE FNS can approve meal service procedures, including meal service times and number of meals offered. Contact DESE FNS for additional guidance.

**Q Will I get reimbursement for miles used to deliver meals via bus route?**

A: DESE has received questions regarding the emergency use of school buses in current COVID-19 situation, specifically using school buses to deliver food to students and or equipping school buses with Wi-Fi to provide internet services to students near their homes. This is allowable. This allowance would fall under the district's emergency preparedness plan as stated in [160.480, RSMo](#). For district reporting purposes, the cost will be reported as allowable transportation cost and the miles reported as ineligible, non-route miles (<https://revisor.mo.gov/main/OneSection.aspx?section=160.408&bid=33163&hl=>). For district reporting purposes, the cost will be reported as allowable transportation cost and the miles reported as ineligible, non-route miles.

For additional meal service guidance for initiating home meal delivery for a household see [USDA Questions & Answers: COVID-19 Summer Food Service Program \(SFSP\) and Seamless Summer Option \(SSO\)PDF Document](#)

**Q: If my school is closed for Spring Break and then remaining closed for COVID-19 can I operate SSO for spring break?**

A: No. If a scheduled spring break was postponed or cancelled due to COVID-19, meals served while school is closed due to COVID-19 can be claimed under SSO, provided the school is eligible for SSO and has submitted an application or online form.

**How do Schools Claim SSO Meals During Closure?**

**Q: How do I claim meals after I operate the SSO program due to the unanticipated school closure during COVID-19?**

A: A daily participation record must be retained. Meals are reimbursed at the appropriate NSLP and SBP free rates for all attending children. The claim will be entered through the DESE Web Applications under SSO claim.

**Q: What are the reimbursement rates under SSO? What is the age requirements for children participating?**

A: Meals served under the SSO are reimbursed at the "free" rates prescribed by USDA for the NSLP and SBP. All persons in the community who are 18 years of age and under may receive meals under the SSO.

**Q: What do I need to do if my claim for reimbursement is late due to school closure?**

A: Disruptions caused by state or local government-ordered school closures or serious illness of responsible staff are both situations falling beyond the local agency's control. As such, these are permissible justifications for exception requests for one or more monthly claims. FNS would approve such exception requests. Please note that local agencies may submit as many exception requests as are needed in this circumstance.

**Disaster Assistance and USDA Donated Foods**

**Q: What is considered emergency feeding during a disaster?**

A: When a disaster is declared, emergency feeding organizations use food from existing inventories and resources. USDA Foods may be used in response to a disaster. A replacement of USDA Foods used may be recovered after. FNS may approve flexibilities to accommodate the needs of severely impacted areas on a case-by-case basis. Contact DESE FNS for additional disaster guidance.

**Q: If I open up a disaster feeding site and not operate SSO or SFSP can I still claim meals?**

A: No. Meals can only be claimed for reimbursement through utilizing SSO or SFSP. Either contact DESE FNS or DHSS CACFP. In the case of a serious human pandemic outbreak in your community, inventories of USDA Food at schools may be an option to meeting feeding needs in response to COVID-19. Schools and community organizations may provide reimbursable meals to low-income children during school closures through SSO and SFSP in the NSLP.

**Q: If my school is closed for COVID-19, can I use donated food in meals, even if my district does not qualify for SSO or SFSP?**

A: Yes, you can use donated foods (commodities) if your school is established as a feeding site in response to COVID-19, for up to 30 days. Please notify DESE FNS as soon as possible if your school has established any disaster feeding activity.

**Q: What records do I need to retain if I am donating USDA Foods during the COVID-19 response for disaster feeding?**

A: All schools using or donating USDA Foods in response to disaster relief of COVID-19 need to maintain daily meal counts, track the material code and description of USDA Foods used, and track the number of cases used for disaster relief. It is essential that all information is reported back to DESE FNS Food Distribution within 45 days of termination of emergency feeding. If you are using donated foods to prepare meals used during operation of SSO you will not be reimbursed for donated foods used.

**Q: Can I use USDA Foods (commodities) for serving elderly people or donate them to other feeding agencies?**

A: Please contact DESE FNS Food Distribution for prior approval of donation to another agency in response to COVID-19.

**Q: Will I be reimbursed for processing fees if I use foods with donated foods?**

A: No. FNS cannot reimburse the local SFA for any product processing fees. USDA may only replace the value of the bulk USDA Foods contained in further processed items. Also, FNS cannot replace commercial foods that are purchased and utilized by the schools.

**Q: My school is closed for COVID-19. Am I required to accept my USDA Foods delivery by Lanter Distributing during the closure?**

A: USDA Foods can be used at schools who are established as a feeding site in response to COVID-19. Therefore, DESE FNS asks for all districts to be present at the time of their scheduled delivery from the state warehouse, Lanter Distributing. Please notify DESE FNS for further guidance if your school is unable to use the products in an efficient and timely manner or keep them in optimal condition.

Please contact DESE FNS team members with questions at 573-751-3526 or [foodandnutritionservices@dese.mo.gov](mailto:foodandnutritionservices@dese.mo.gov).