

Food & Nutrition Services: School Year 2020-2021 Waivers & Updates

Updated 10/13/2020

Child Nutrition Program COVID-19 Waivers

On October 2, 2020, U.S. Secretary of Agriculture Sonny Perdue announced the USDA will extend previous flexibilities through June 30, 2021. The flexibilities allow summer meal programs including Seamless Summer Option (SSO) and Summer Food Service Program (SFSP) to continue into the fall months. This extension of summer programs gives child nutrition program operators the authority to provide free meals to all children. The following key flexibilities are in full effect through June 30, 2021:

- [Allow Summer Food Service Program and Seamless Summer Option Operations](#). If you plan to participate in this flexibility you **must complete the SSO Participation Survey here**.
- [Flexibility to Extend Area Eligibility Waivers – EXTENSION 3](#)
- [Allow Non-congregate Feeding in SFSP and the National School Lunch Program Seamless Summer Option – EXTENSION 5](#)
- [Allow Parents and Guardians to Pick Up Meals for Children- EXTENSION 5](#)
- [Waiver of Meal Service Time Restrictions in the SFSP and the National School Lunch Program Seamless Summer Option](#)
- [Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites Extension 2](#)

Pursuant to section 2202(a) of the Families First Coronavirus Response Act (the Act) (P.L. 116-127), and in light of the exceptional circumstances surrounding COVID-19, USDA FNS has established the following [additional nationwide waivers](#), available to schools that elect to use them. The following waivers apply to schools operating the National School Lunch Program, School Breakfast Program, Summer Food Service Program and Seamless Summer Option in SY 2020-21.

- [Meal Pattern Flexibility](#): This waiver applies to the National School Lunch Program (NSLP), School Breakfast Program (SBP) and CACFP meals. Schools may apply here to waive specific meal pattern requirements, as needed, to support access to nutritious meals when certain foods are not available during this pandemic. In effect through June 30, 2021.
- [Milk Variety and Meal Pattern Flexibility in the NSLP SSO](#): This waiver applies to the requirements to serve SSO meals that meet the meal pattern requirements. In effect through June 30, 2021.
- [Offer Versus Serve Flexibility for Senior High Schools Waiver](#): The Offer vs. Serve requirement is waived for senior high school grades 9-12 to support an attempt to adhere to guidance from the Centers for Disease Control and Prevention (CDC) to serve individually plated meals instead of in a communal cafeteria. In effect through June 30, 2021.
- [Waiver of Child Nutrition Monitoring](#): USDA FNS has issued flexibility to waive certain onsite monitoring requirements for the school meals programs to maintain program integrity and support social distancing while providing meals.
- [Local Wellness Policy Triennial Assessment](#): Nationwide waiver to support schools unable to complete a triennial assessment of the local wellness policies by June 30, 2020.

- [Provision 2 Waiver Base Year 2019-2020](#): Allow schools that were conducting a Provision 2 base year in school year 2019-2020 to use annualized data or use data from months when school was in full operation when determining reimbursement for non-base years.
- [FSMC Contract Duration](#): Nationwide waiver allows flexibility for FSMC contracts that may expire by or around June 30, 2020, may be extended through SY 2020-21 (June 30, 2021).

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/COVID-19 Information](#) webpage. Please contact DESE FNS team members with questions at 573-751-3526 or foodandnutritionservices@dese.mo.gov.

Frequently Asked Questions

Food and Nutrition Services Website Quick Links

- [Elect into the Back to School Waivers](#)
- [Seamless Summer Option Participation Survey](#)
- [Apply for the Meal Pattern Waivers](#)
- [School Year 2020-2021 Resources](#)
- [Back to School Webinar and Trainings](#)
- [Back to School Waiver Information](#)

Frequently Used Acronyms & Terms

ASP	Afterschool Snack Program
CEP	Community Eligibility Provision
FDP	Food Distribution Program (Donated Foods)
FFVP	Fresh Fruit and Vegetable Program
FSMC	Food Service Management Company
LEA	Local Education Agency
NSLP	National School Lunch Program
PLE	Paid Lunch Equity
SBP	School Breakfast Program
SFSP	Summer Food Service Program
SSO	Seamless Summer Option
USDA	United States Department of Agriculture

Operating SFSP and SSO during SY 2020-2021

Q: What do I need to do to start operating SFSP or SSO?

A: The waiver to allow operation of the summer food service program for SY 20-21 was effective as of August 31. **Effective August 31**, schools that have already begun the academic 2020-2021 school year have the authority to operate the summer meals programs. Contact the Department of Health and Senior Services for questions related to the SFSP Program.

Complete steps below so that our office has record of your participation in this waiver for SSO:

1. To operate SSO for the month of September the LEA must complete the SY 2019-2020 Seamless Summer building application for each meal service site. This application is located on the [DESE Web Application system](#). See the SSO Site Determination Flowchart to help with deciding if your site is open or closed. Ensure applicable waivers are approved.

2. To operate SSO for the months October 2020 through June 2021 the LEA must complete the SY 2020-2021 Seamless Summer building application for each meal service site. Access to this application is not yet available until **October 14, 2020**. LEA may contact our FNS staff or the Nutrition Program Specialist if they wish to begin the process completing the Seamless Summer building application at each site. **This shouldn't delay your meal service.** A list of FNS contact information is located on our website [here](#).
3. All LEAs planning to participate in SSO or SFSP must complete the Seamless Summer Option Waiver [survey](#) for SY 20-21 to opt into the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Options Operations through June 30, 2021.
4. For LEAs planning to participate in the Back to School [waivers](#) to provide non-congregate meals, allow parent/guardian to pick-up meals, provide multiple meals at one time, or waive offer versus serve requirements for senior high school students must complete the Back to School Waiver [survey](#).
5. If you are not participating in NSLP during the months September-June 2021 you must unselect these operation months on the School Nutrition Program application packet.
6. Save and submit all applications for approval.

Q: When can I start feeding all kids for free through SSO?

A: You may begin operation at any time at sites that meet site eligibility requirements or apply for applicable waivers. The Seamless Summer application must be completed on the [DESE Web Application system](#). In addition all LEAs planning to participate in SSO or SFSP must complete the Seamless Summer Option Waiver [survey](#).

SSO meals served in SY 20-21 under this waiver authority may be retroactive to the day the school began operating SSO, but no sooner than August 31, 2020. The waiver authority was released from U.S. Department of Agriculture on August 31, 2020.

Q: What are the eligibility requirements my school must meet in order to be eligible to participate in SSO and offer free meals to children in the community age 18 and under?

A: The school site must qualify for Area Eligibility or apply for the Area Eligibility waiver.

Area Eligibility:

- On a first-come, first-served basis, serves all children age 1-18 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.
- If your site is qualified for area eligibility and you do not wish to operate an open site you may operate a closed enrolled site and restrict meals to students enrolled.
- Area eligibility of a site will extend to another site that is within the same attendance area.

Q: What do I do if my school site has less than 50 percent F/R and is not area eligible?

A: With new authority provided by the Families First Coronavirus Response Act, schools operating the SSO are eligible to apply for an area eligibility waiver to operate an open site. Effective April 9, 2020, DESE was approved for an Area Eligibility waiver, which applies to school districts and meal site locations that are not located in “Areas in which poor economic conditions exist” and allows school districts operating SSO who are in good standing to submit a request. An open site must be committed to feeding all children age 18 and under in the community. Your LEA can apply for this waiver [here](#). If the LEA is already approved for the area eligibility waiver do not apply again, contact our office to add buildings.

Q: What are the requirements for the area eligibility waiver?

A: The school must show how COVID-19 has effected the local community such as an increase in unemployment rates. More information can be found in a previous FAQ updated on 4/28/20 found on the DESE FNS site [here](#).

Q: If a site doesn't want to be "open" to the public, do they continue NSLP/SBP OR qualify as a closed enrolled site to serve all meals for free?

A: DESE FNS has two waivers in effect: #52 which provides area eligibility nationwide; and #48 which deals with area eligibility for closed enrolled sites. Taken together, these allow schools approved for area eligibility to operate a closed enrolled site.

- School sites with a free or reduced percentage of at least 50 percent are determined area eligibility requirements based on school data and must notify FNS to elect to participate in waiver #48 which deals with area eligibility for closed enrolled sites. When determining area eligibility of a school site, the percentage of children eligible for free or reduced price school meals at another school in the same attendance area can be used. In other words, school sites establish area eligibility the same as any other site.
- School sites with less than 50 percent students eligible for free or reduced price meals and not located in the attendance area of another site that does qualify for area eligibility must first apply for the waiver #52 which provides area eligibility and then elect to participate in waiver #48 which deals with area eligibility for closed enrolled sites.

To elect to participate in waiver #48 for closed enrolled sites indicate by making a comment to elect to participation in this waiver when completing the SSO building application under question 10 for Closed Enrolled site option.

Q: Can teachers/adults eat free under NSLP, SBP or SSO?

A: No. Teachers and adult meals must be priced according to adult meal price requirements. These non-program meals are non-reimbursable under the Child nutrition Programs. If teachers/adults are not charged a meals price, the district general fund must cover this expense. This is an unallowable cost to the non-profit food service account.

Q: Can we operate SSO if we do not have students participating in virtual education?

A: Yes. SSO can be operated at schools that have in-person, hybrid and remote. Back to School waivers, which are the Non-Congregate, Meal Times, Parent/Guardian Pick-Up, and Offer versus Serve in High School. Schools are not required to receive prior state agency approval, but must complete the online [Back to School Waiver](#) survey to elect into the waivers. Please elect into these [Back to School Waivers](#).

Q: How do I know if I do not qualify for SSO?

A: SSO eligibility for each meal service site is determined by the percentage of free or reduced (F/R) price students enrolled at the site. Sites with a F/R percentage of 50 percent or more qualify for area eligibility and can operate either an Open site. Sites with a F/R price percentage of less than 50 percent SSO are restricted to operating and must target students who are eligible for free or reduced price meals only. This may not work for during the normal school year and is meant for summer school operations. Due to the pandemic DESE FNS has two waivers in effect: #52 which provides area eligibility nationwide; and #48 which deals with area eligibility for closed enrolled sites. Taken together, these waivers allow schools to participate in SSO with documentation of a high need. The area eligibility waiver is also available [here](#).

Q: The district has a free and reduced percentage of 23%, do we qualify for SSO?

A: The school site with F/R percentage of less than 50 percent may apply for the Area Eligibility waiver and if approved may operate an Open (Area Eligible) site. Meals must be offered to the children living in the area and enrolled in school for free age 1-18. LEA can apply for this

waiver [here](#).

To operate a Closed Enrolled site see question above that answers “if a site doesn’t want to be “open” to the public”.

Q: Can the school operate FFVP and SSO?

A: Yes. If the school has been awarded the FFVP grant it can operate during the operation of SSO. Missouri has a pending parent guardian pick-up waiver for FFVP that we are waiting on approval from national office. For schools participating in non-congregate FFVP meals the student MUST be present at pick-up until we have approval from USDA to distribute FFVP to the parent without the student present.

Q: Can the school operate After School Snack Program through National School Lunch Program and SSO at the same site?

A: Yes. Operating multi-programs may be approved based on the needs of each school. School Nutrition Program application packets must be updated to reflect operation of these programs.

Q: The school district has one building for K-12. The K-8 has more than 50 percent of students eligible for F/R meals and qualifies for area eligibility but the 9-12 grade does not what do I do with the high school site even though it is all in the same building?

A: Since the K-8 grade site qualifies for area eligibility that will extend to the 9-12 grade and you can operate an Open site or elect to participate in waiver #48 to operate a Closed Enrolled site. When a school site qualifies for area eligibility and is located within the attendance area of another site or grade that doesn’t qualify for area eligibility the area eligibility of one site does extend to the site that is located in the same attendance area.

Q: My school has 3 buildings that are CEP and one building that is not qualified for CEP.

A: SSO site eligibility is determined by the free or reduced percentage at each site. The site must have F/R percentage of at least 50 percent to be eligible for area eligibility and operate an Open site or elect to participate in waiver #48 to operate a Closed Enrolled site.

If an elementary school has a free or reduced percentage of 31.5 percent and participates in CEP then to determine the eligibility for SSO you can use the identified student percentage multiplier of 1.6 to determine eligibility. For example: $31.5 \times 1.6 = 50.4$ percent. The CEP site would qualify for area eligibility at 50.4 percent. Buildings located in the same attendance area of that building would then also qualify for area eligibility.

The [COVID 19 FAQ 4/28/20](#) has additional guidance on the Seamless Summer Option that was released from our office on 4/28/20 including Community Eligibility Provision, claims and meal counts.

This is a comparison [chart](#) between the various Child Nutrition summer feeding programs (SFSP/NSLP/Seamless Option).

Schools operating SSO must complete the On-Site School Review for Seamless Summer Option Sites during the first 3 weeks of operation and retain the completed document on-site. This form can be found [here on our website](#).

Back to School NSLP, SBP and SSO Waivers

Q: Who do I contact for questions and help with any of the waivers and other program questions.

A: Contact your regional Nutrition Program Specialist. See our contacts [here](#). Or you may also contact our DESE FNS office at 573-751-3526. A list of FNS contact information is also located

on our website [here](#). Keep up with updates on our [Food and Nutrition Services](#) website.

Q: What is DESE-FNS Calling the Back to School NSLP, SBP and SSO Waivers?

A: DESE-FNS is calling a collection of waivers that were released by the USDA on June 25, 2020 the Back to School Waivers. These waivers include:

- Non-Congregate Feeding
- Meal Service Time Flexibility
- Parent/Guardian Pick-Up
- Meal Pattern Flexibilities
- Offer Versus Serve Flexibility for Senior High Schools waivers.

These waivers introduce flexibility in the National School Lunch Program, School Breakfast Program and also apply to the Seamless Summer Option to prioritize safety while still providing nutritious meals to our participants.

Q: How do I apply for any of these waivers?

A: For the Back to School waivers, which are the Non-Congregate, Meal Times, Parent/Guardian Pick-Up, and Offer versus Serve in High School. Schools are not required to receive prior state agency approval, but must complete the online [Back to School Waiver](#) survey to elect into the waivers. Please elect into these waivers by September 30, 2020.

The Meal Pattern Waiver must be approved prior to implementation. Please complete the [Meal Pattern Waiver](#) survey to apply for the first short term approval of the Meal Pattern Waiver through December 31, 2020. Please complete this waiver by September 30, 2020. The Meal Pattern Waiver survey will be redistributed in November for a second term approval from January 1 – June 30, 2021.

The waiver forms can also be accessed on our [School Year 2020-2021 Resources](#) webpage.

Q: If we do not need a waiver at this time, should we complete these waivers in case we end up in a situation where these are needed?

A: It is recommended for you to elect into the waivers: Non-Congregate, Meal Times, Parent/Guardian Pick-Up, and Offer versus Serve in High School by September 30. Only complete the Meal Pattern Flexibilities waiver if you currently need it or anticipate a specific need in meal pattern flexibility. If you find that you did not complete all necessary waivers before September 30, contact our office at foodandnutritionservices@dese.mo.gov for assistance.

Q: Are separate menus required for grades K-5, 6-8 and 9-12?

A: The meal pattern for each grade level is different. Grades K-5 and 6-8 have an overlap so grades K-8 can be served a similar menu. Grades 9-12 do not have an overlap and must follow the 9-12 meal pattern. While the Meal Pattern Flexibilities waives daily and weekly requirements and dietary specifications, program operators must uphold the intent and integrity of the program. Each grade group's meal pattern should be used as a foundation for menu planning. If your LEA is experiencing financial or operational challenges the waiver can be used to allow flexibilities within the meal pattern.

Q: Will there be a waiver for potable water?

A: Missouri has requested a waiver from requirement to make potable water available and accessible without restriction to children at no charge in the place(s) where breakfast and lunch meals are served during the meal service. However, we are still awaiting a response from the USDA, so the waiver is not in effect at this time. Potable water is not a requirement that the school must meet if you are participating in grab-n-go meals that are sent home for students to consume off-site. Potable water is only a requirement for student consuming meals in a congregated setting at school.

Q: Is there a waiver available for the Afterschool Snack Program to offer and claim snacks

if enrichment programs are not offered?

A: The waiver of the activity requirement in afterschool care child nutrition programs expired on June 30, 2020. Therefore, at this time, LEAs are required to have an educational or enrichment activity in order to claim snacks in the Afterschool Snack Program. Sending an activity home with the snack and/or offering a virtual activity is allowable and encouraged.

Q: Is there a waiver for Fresh Fruit and Vegetable Program (FFVP) to offer a fresh fruit or vegetable at a Parent/Guardian Pick Up site with the student not present?

A: Elementary schools operating FFVP may serve fresh fruits and vegetables in a non-congregate setting, including through home delivery. A waiver is not necessary to exercise this flexibility. However, the current parent/guardian pick-up waiver does not apply to FFVP, so students are required to be present to receive the fresh fruits and vegetables through this program. Missouri DESE-FNS has applied for a waiver to allow flexibility for parent/guardian pick up through FFVP and this waiver is still in pending approval status.

Q: Can the Fresh Fruit and Vegetable be sent out in bulk such as 5 servings provided on Monday for the week?

A: Elementary schools operating FFVP that are providing multiple days of meals at one time also may provide multiple servings of FFVP foods at one time. For example, sites may permit children to pick up a week's supply of FFVP fruits and vegetables at a time. The FFVP bulk serving size must reflect the serving size for an individual student during a school week.

Q: Is there a waiver the PLE tool or PLE requirements?

A: Any LEA with a positive or zero balance in its nonprofit school food service account as of December 31, 2019, is exempt from Paid Lunch Equity (PLE) pricing requirement for school year 2020-21. To apply for this exemption, the [Exemption from PLE](#) form must be completed. LEAs that had a negative balance in the nonprofit school food service account as of December 31, 2019, must follow PLE requirements when establishing their prices for paid lunches in SY 2020-21.

LEAs that do not qualify for the PLE exemption may choose to contribute non-Federal funds to the nonprofit school food service account in lieu of raising paid lunch prices. To determine the amount of required funds needed to contribute in lieu of raising prices, the SY 20-21 Non-Federal Calculator in the PLE tool must be completed. The PLE tool is available in [Excel format](#) or available under Applications in [Web Applications](#).

Q: Will there be a waiver to offer one K-12 lunch menu to all students at a K-12 school?

A: At this point in time, there is not an overlapping meal pattern for grades K-12 at lunch. However, if there are specific meal pattern requirements that you need waived, you can complete the [Meal Pattern Waiver](#) survey for approval.

Q: Pre-K normally co-mingles with other grade groups allowing us to serve through the NSLP/SBP meal pattern. If Pre-K is eating in their classroom to social distance, what meal pattern do we use?

A: If Pre-K is no longer co-mingling you will be required to meet the [CACFP meal pattern](#).

Co- mingling practice may include at least one of the following:

- Pre-K goes through the meal service line/POS at the same time as other grade groups
- Pre-K eats in the same space as other grade group.

Meal Service in School Year 2020-2021

The Missouri Department of Elementary and Secondary Education (DESE) Food and Nutrition Services (FNS) knows food service professionals are planning for different operations for the 2020-21 school year, as the COVID-19 pandemic continues. The following resource has been added to the DESE FNS website to assist in that planning process: [COVID-19 Thought Starters on Reopening Schools for SY2020-21](#).

Q: Are schools able to provide free meals to all children during SY 2020-2021?

A: LEAs participating in CEP or Provision 2 are able to provide free meals to all children through NSLP and SBP. Non-provision schools operating NSLP and SBP must count and claim meals in each student's approved eligibility (free, reduced and paid). Under extended waiver authority schools may operate SSO or SFSP instead of NSLP/SBP and provide free meals to children. Schools will be approved to operate SSO based on site eligibility.

Q: Will districts be able to run as an "open" site like they may have done during the unanticipated school closures?

A: Schools operating the Seamless Summer Option (SSO) may be approved to operate an "open" site. This meal service method is only an option under SSO program and not available through the NSLP/SBP. Meals served through NSLP/SBP must only be offered to enrolled students and claimed under each student's approved eligibility status for free, reduced, or paid. An "open" SSO site can be operated by schools with a free or reduced price percentage of 50% or more and serves all children through age 18 at a site located within the geographical boundaries of a school attendance, these meals are claimed for free.

Q: Are LEAs required to provide meals to students learning virtually?

A: Schools that elect to participate in the Nationwide Non-congregate Meals waiver must offer meals to all students learning virtually. This waiver could be important for students who are not learning virtual but may have to quarantine. Electing to use this waiver means you must offer meals.

Additional waivers available to schools this year allow for maximum flexibility with the program and meal service. The Parent/Guardian Pick-Up Waiver allows for parents or guardians to pick up lunch, and breakfast on behalf of the student(s). The location of the Parent/Guardian Pick-Up site(s) depend on what works for your school and households. Options include:

- Drive up/through
- Bus route deliveries
- Walk-up Grab & Go

The Meal Times Waiver allows for schools to distribute or serve breakfast and/or lunch outside of the required meal service times. With meals being allowed to be served outside of the required meal times, meals can be served in bulk for multiple days of meal consumption.

Q: Will there be some flexibility allowing parents/students to pick up meals at buildings/sites within the district if the student is not enrolled at that building?

A: Parents/Guardians or students are allowed to pick up meals from a site within the district where they are not enrolled. However, the student should be claimed under the building in which they are enrolled. The meal given to each student must meet the meal pattern requirements for their grade group (9-12, K-5, 6-8, or K-8). Because of this, planning for meal distribution and meal counting and claiming will require clear communication between the district and households. It may be important for the school nutrition staff to prepare meals for the students outside of the building's grade group. This practice will also require communication between school buildings and avoid errors in meal counting and claiming. Complete the [waiver here](#) to elect utilizing flexibility for parents/guardians to pick up meals without the student present. Additional parent/guardian meal pick-up resources are found on the [School Year 2020-21 Resources page](#).

Q: Will there be a waiver for 5 or 7 day meal kits for NSLP and SBP?

A: The Nationwide Meal Times waiver along with the Nationwide Non-congregate waiver allow for multiple meals to be sent home for off-site consumption. LEAs can only claim meals on days that school is in session. Weekend meals are not eligible for reimbursement through NSLP unless the LEA operates a regular school day over the weekend. Weekend meals are allowable under SSO with State Agency approval.

Q: If students are eating both breakfast and lunch in the classroom, does signage on what constitutes a reimbursable meal need to be displayed in each classroom? Are there any suggestions on how to display this information?

A: No meal signage in each classroom is not required. It is recommended to display reimbursable meal signage in common spaces such as a bulletin board or in the school office. For virtual students, it is recommended to make this signage available online.

Q: If students are eating both breakfast and lunch in the classrooms, does the “And Justice for All” poster need to be displayed in every classroom?

A: No. It is recommended to display the “And Justice for All” poster to be displayed in common spaces such as a bulletin board or in the school office. Program Operators must uphold civil rights standards and ensure households are aware of laws that protect them from discrimination and procedures to file a complaint. Your LEA may make the “And Justice for All” poster available on your website, publish the non-discrimination policy and procedures in a handbook or online so households know the appropriate procedures for filing a Program complaint. A school must not process their own civil rights complaints and they must be forwarded to DESE-FNS, Kansas City Office of Civil Rights (public schools only) or the USDA National Office of Civil Rights.

Q: Can teachers/adults eat free under NSLP, SBP or SSO?

A: No. Teachers and adult meals must be priced according to adult meal price requirements. These non-program meals are non-reimbursable under the Child nutrition Programs. If teachers/adults are not charged a meals price, the district general fund must cover this expense. This is an unallowable cost to the non-profit food service account.

Q: Can schools sell a la carte items to students who are learning virtually?

A: Yes. Food sold outside of the reimbursable meal is non-program food revenue.

Q: We must offer 1 cup of veg but do the students need to take the full cup?

A: Grades 9-12 must be offered at least 1 cup of vegetable at lunch, and grades K-8 must be offered at least $\frac{3}{4}$ cup of vegetable at lunch. If Offer versus Serve is implemented, students are not required to take the full amount of vegetable. They must select at least three components including at least $\frac{1}{2}$ cup of fruit and/or vegetable. If Offer versus Serve is not implemented, then the students must be served the full amount of vegetable (1 cup for grades 9-12 and $\frac{3}{4}$ cup for grades K-8).

Q: If a student picks up meals for 5 days on Monday, how are those meals counted and claimed for reimbursement?

A: Only one meal per day may be counted and claimed. Multiple meals served on one day must be documented as served throughout the week as 5 operating days. The daily claim total cannot exceed the number of students enrolled so these meals have to be recorded across the week.

Point of Sale/Service (POS)

Q: Will Daily Meal Count Forms/Tally sheets be allowable?

A: LEAs operating NSLP are required to claim meals under each student's Free, Reduced, or Paid eligibility status if you are a non-provision (i.e. CEP) and claiming meals under NSLP and SBP. Because of this, Tally Sheets and Daily Meal Count Forms that just track the total number of meals are not allowable unless the school is operating CEP or Provision 2. If not operating a special provision, the meal counting system must be able to track each student who received a meal so that the correct eligibility status can be claimed. Schools that are operating SSO may use tally sheets. **Daily meal count documentation is required for all reimbursable meals including NSLP and SSO and will be subject to fiscal action if this documentation is not retained.**

Q: For SSO, schools have been able to tally the number of students since they are all free, but now have questions on how to implement a point of service where they are maintaining counts based on each student's eligibility when returning to NSLP. What are some ideas for implementing a correct point of service for the following situations?

A: An exchange between students and school food service personnel occurs at the POS. The student or parent/guardian provides a medium of exchange or form of identity to the school food service personnel to receive breakfast and/or lunch. During this exchange, the meal(s) provided must be counted and marked for reimbursement. Find resources for the POS on our [School Year 2020-2021 Resources](#) page.

Meals in the Classroom

- A roster marked off by the teacher and turned into cafeteria manager.
- Teacher collects meal cards or student IDs and turned into cafeteria manager.
- With travelling grab & go cart, operator may have classroom rosters and mark off when students receive a meal, collect meal cards or student ID and scan at the cart or in the cafeteria's POS.

Parent/Guardians Pick Up

- Verify the identity of the parent/guardian by:
 - Student ID
 - Meal Card
 - Student PIN
 - Car Tag with Bar Code
- Enter electronic codes or ID's through Computerized POS (tablet, computer cart, depending on pick-up site set-up).
- Roster with student name, grade, and enrolled building, marked off at POS

Meal Delivery on Bus Routes

- Verify the identity of the parent/guardian or student by:
 - Student ID
 - Meal Card
 - Student PIN
- Enter electronic codes or ID's through Computerized POS
- Bus route roster with student name, grade, and enrolled building, marked off at POS

Hybrid Learners: in-person instruction and virtual learning

- Use a combination of on-site and off-site POS procedures.

Q: Would the student bar code (for meal scanning) be acceptable to print on the car tags? This would allow the POS to scan the barcode when picking up meals.

A: Yes.

Q: When completing the Method of Collection and Meal Counting Form, do we put down ALL potential methods of collection with our application this year, to cover the potential transition to remote learning?

A: Possibly. Review your Method of Collection and Meal Counting form to see if a new method is being or will be possibly implemented. Current methods you are practicing may be easily translated to the options to feed remote learners and you will not need to make adjustments to your form.

Q: For those students learning virtually, will they be charged for breakfast and lunch based on their free or reduced price status?

A: Yes. All students will be counted and claimed under their eligibility status however, if your LEA is participating in CEP or Provision II, you will provide free breakfast and lunch for student.

Q: How will we receive or guarantee ADA (Average Daily Attendance) with virtual learning? How will this affect the meal claiming process?

A: Participation will be based on the count of meals that were served to a participating student. This does not have an impact on your claim for reimbursement.

Verification

Q: We are starting school later than usual. Do we choose our verification pool from active applications approved during SY20-21, or do we also include families that may still be on the grace period as of October 1?

A: If the 30 day carryover of benefits is still in effect as of October 1, applications approved from the previous year are **not** included in the sample pool. Only applications received during the current school year are subject to verification. When you count your applications to determine how many to verify, you won't include last year's in your count of applications.

When you complete the verification report, you won't include last year's applications in the count of applications since you included them in the count last year. This may result in a warning on the verification report that the number of free and reduced eligible don't match the number on your October claim. You'll need to explain in the comments that the reason is the 30-day carryover of benefits ended after October 1.

Q: If we are utilizing the Seamless Summer Option waiver and not operating NSLP are we still required to complete verification in October?

A: Our office is waiting on additional guidance from USDA for verification. We do know that if you operated NSLP and/or SBP in August and then switched to SSO or SFSP in September, you may still be required to complete portions of the verification process for applications received by October 1.

Eligibility/Benefit Issuance

Q: This year we have many students transferring in from other districts. If the student is transferring from a district that participates in CEP, will these students receive free benefits based on the CEP participation instead of income eligibility?

A: For a child who transfers from a CEP school or school operating Provision 2 for both breakfast and lunch, LEAs **must** provide free reimbursable meals for **10 operating days** or until a new eligibility is determined, whichever comes first. LEAs **may** provide free reimbursable meals for **30 operating days** or until a new eligibility is determined, whichever comes first, for a child who transfers from a CEP school or a school operating Provision 2 for both breakfast and lunch. A list of buildings operating CEP is available on the [DESE FNS website](#). After the grace period, the student will need to qualify based on individual eligibility either through direct certification or free or reduced price meal application in order to continue receiving benefits.

Q: If we switch to SSO or SFSP are we still required to collect eligibility documents and direct certification?

A: At this time we strongly recommend to continue collecting eligibility documents. **Core data/MOSIS still requires schools to enter CURRENT school year eligibility status in October. These documents will be required to enter data for Core data.** Eligibility does impact other areas of federal programs such as funding for Title 1, special Provision and other education programs. These documents are important and we encourage you to continue collecting eligibility documents. When NSLP does resume these documents will be required for accurate meal counting and claiming.

Q: Does 30-day carryover still apply if we pause operating NSLP and start operating SSO or SFSP?

A: Our office is still waiting on USDA guidance for carryover. Under NSLP students may use eligibility status from the school year prior for the first 30 operating days of the new school year or until a new eligibility can be determined. This carryover flexibility reduces administrative burden and provides additional time to process applications.

When the 30 operating days end the student must have a new eligibility approved or determined paid status. In this situation if a school starts operating NSLP in August and then switches to SSO or SFSP in September there is a pause in the 30 day carryover period (i.e. school started NSLP on August 19th and operated for 13 days using carry-over eligibility for some students before switching to SSO on September 8th, which paused the carry-over eligibility and will resume again when the school resumes operating NSLP leaving 17 operating days remaining for the school to collect meal application form from the student).

Food Distribution Program (Donated Foods)

Q: If a district has allocated \$ towards brown box and wants to change orders & shipment what is the process?

A: It is strongly encouraged for all schools to receive their anticipated brown box orders in full, every month. In the event a school's program is impacted by COVID-19 a school can submit a request to cancel brown box orders on a monthly basis. The request needs to be submitted via the Brown Box Cancel Form found on the FNS website no later than the 15th of the month prior to cancellation. This form will not

cancel FFS, NOI, or DoD Fresh orders. If you need to make adjustments to orders of processed items please contact the appropriate vendor or broker. Once we cancel the order, your entitlement value will be lost and products will not be re-delivered.

Q: When receiving a delivery, what information is there with regard to the COVID-19 virus being on the cases? How long can it live on cardboard, in freezers, storage areas? How should we disinfect the cases since they contain food?

A: The CDC and FDA guidelines are highlighting that the virus is still thought to be spread most often by respiratory droplets and that the risk of infection from food packaging is minimal. After receiving a delivery, CDC guidelines encourage food handlers to wash hands with soap and water for at least 20 seconds. It is recommended by CDC to not use disinfectants designed for hard surfaces, such as bleach or ammonia, on food packages in cardboard or plastic wrap. For more information in regards to food safety and handling cases please reference the CDC guidance and contact your local health department.

Q: If my school building is closed for COVID-19 am I responsible to show up for my Lanter delivery?

A: Deliveries must be received in full even if a school building is closed unless prior accommodations have been made with the state agency. Even if your school is closed it is a requirement for a school representative to be present to receive the USDA Foods order during their scheduled appointment. Fees associated with no-show deliveries will be the responsibility of the school.

Q: In the event my school is closed or is doing virtual learning, how can my school use USDA Foods?

A: In reference to CFR 250.59, a school's primary use of USDA Foods is the preparation of reimbursable meals through the NSLP. Schools may also use a portion of the donated foods in other activities of the nonprofit school food service including school breakfast, seamless summer option, a la carte foods, adult meals, and instruction for students. Examples of USDA Foods used in for instruction include home economics, nutrition, food preparation, or other health related courses. USDA Foods used for training or educational purposes will not be replaced. The products containing USDA Foods may not be sold unless the proceeds accrue to the school's nonprofit food service account.

USDA Foods that cannot be used by a school in a timely manner should be transferred to another recipient agency. When transferring USDA Foods, the school initiating the transfer must develop a list that includes the agreement number, the name of USDA Foods, and quantities being transferred to keep with their inventory records. Excess USDA Foods cannot be distributed for personal consumption under any circumstances.

Q: If my school participates in SSO or SFSP, how will my entitlement be effected for the upcoming school years?

A: The LEAs entitlement value is determined based on the total lunches served 2 years prior to the entitlement value. In June, USDA released an opt-in waiver for the SY 2021-2022 entitlement level to reflect the SY 2018-2019 lunch counts, which are assigned in January 2021 for placing SY 2021-2022 orders. Missouri did opt-in to this waiver to help minimize the impact of school closures on USDA Foods entitlement calculations for the SY 2021-2022 entitlement level. Schools will see that entitlement value reflective in their SY2021-2022 USDA Foods Packet.

The impact of the SY 2020-2021 lunch counts will not be seen until the SY 2022-2023 entitlement value is released. At this time, USDA has not released a waiver or guidance in regards to the effect SY 2020-2021 lunch counts will have on entitlement value, as the COVID-19 pandemic continues across the nation. Please know that our office was notified that USDA is aware of this concern and we will update schools when further guidance is released.