

## Food & Nutrition Services: COVID-19 Waivers & Updates

*Information last updated 6/16/20*

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](#).

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:

- [Meal Pattern Waiver](#): 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 emergency. This waiver was recently extended through July 31, 2020.
- [Meal Times Waiver](#): USDA FNS has provided a nationwide waiver to support access to nutritious meals outside of the designated meal periods to minimize potential exposure to COVID-19 in the NSLP and SBP. This waiver was recently extended through August 31, 2020.
- [Meal Service Time Restrictions in the Seamless Summer Option](#): Nationwide waiver to support access to nutritious meals outside of the designated meal periods to minimize potential exposure to COVID-19 in the NSLP Seamless Summer Option. This waiver was recently extended through September 30, 2020.
- [Parent/Guardian Meal Pickup Waiver](#): This waiver allows parents and guardians to pick up meals for their children without the child being present, as long as schools protect the accountability and integrity of the program. This waiver was recently extended through August 31, 2020.
- [Community Eligibility Provision \(CEP\) Data Waiver](#): The CEP deadlines are being extended for reporting SY 2019-20 student counts to establish SY 2020-21's identified student percentage for CEP, as well as for the required notifications and CEP election. No application required.
- [Activity Requirement in Afterschool Care Waiver](#): The requirement for an educational or enrichment activity when serving an afternoon meal/snack under the National School Lunch Program (NSLP) or Child and Adult Care Food Program has been waived. This applies to afterschool snacks in the NSLP for schools who currently participate in the Afterschool Snack Program. No application required.
- [Waivers 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.
- [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 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

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## Continuing Meal Service During the Summer Months

DESE FNS recognizes schools need additional support and flexibility to make a smooth transition to traditional summer operations this year. DESE is reevaluating the continued need for the waiver support as the COVID-19 situation evolves.

### **Q: What do we need to do to continue providing meals through the summer?**

A: After your school year ends, the Seamless Summer Option (SSO) is designed to encourage more school districts administering the National School Lunch (NSLP) or School Breakfast Program (SBP) to provide meals during summer months. SSO is not tied to summer curriculum. Normal summer conditions require reimbursable meals to be consumed on-site in a congregate setting during designated meal times. However, during the COVID-19 pandemic, certain waivers are allowing flexibility so school districts can continue providing meals to be taken and consumed offsite to allow for social distancing.

### **Q: What are the next steps to continue meal service through SSO?**

A: The LEA will need to:

- revise the current SSO application that was approved for COVID-19 school closure and make appropriate changes to dates of summer operation, including meal times, days of operation, estimated participation and site type (open or closed enrolled);
- meet normal closed enrolled requirements to continue a closed enrolled SSO site (this will be a change for school sites that were approved to operate a closed enrolled site during the unanticipated school closure);
- specify in the Comments From LEA box on the application the methods of meal delivery, such as car pickup line or bus delivery, and if the parent/guardian is picking up meals without the student present;
- notify households in the surrounding area about the availability of meals and any changes made to distribution;
- continue meal counts for reimbursement and proper production records;
- apply for an area eligibility waiver (if currently a non-area eligible site) to operate an open feeding site at current non-area eligible sites, and;
- watch for updates from DESE FNS as we continue to seek guidance and waiver extensions.

### **Q: How do current Food and Nutrition Services waivers apply to summer meals?**

A: The waivers allow flexibility for an altered approach to meal service outside of the normal program requirements to support social distancing and help ease administrative burdens due to COVID-19. Below is a summary of the current waivers and how each waiver can apply to SSO meals served in the summer months.

- Reimbursable meals typically are to be consumed on-site in a congregate setting. The [Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Program](#) was recently extended through August 31, 2020. This waiver lifts that requirement, allowing for non-congregate meals. This means grab-and-go or meal delivery options are available to schools through August 31.
- Reimbursable meals typically are to be served during a designated meal time. The [Meal Service Time Restrictions in the Seamless Summer Option](#) provides support to access nutritious meals outside of the designated meal periods for **Seamless Summer Option** to minimize potential exposure to COVID-19. This waiver has been extended through September 30, 2020. To participate in this waiver email your request to [foodandnutritionservices@dese.mo.gov](mailto:foodandnutritionservices@dese.mo.gov).

- Reimbursable meals typically include specific meal pattern requirements. The [Meal Pattern Waiver](#) removes these requirements, as needed, to support access to nutritious meals when certain foods are not available during this emergency. USDA is now offering this flexibility through July 31, 2020.
- Reimbursable meals typically are to be consumed on-site by the student. The [Parent/Guardian Meal Pickup Waiver](#) allows parents and guardians to pick up meals for their children without the child being present, as long as schools protect the accountability and integrity of the program. No application is required. The waiver expires September 30, 2020.
- 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.” This Area Eligibility Waiver was extended through August 31, 2020.

**Q: Can meals be served on weekends?**

A: With state agency approval, SSO service may serve meals on days when schools had originally planned to be closed, including weekends, spring break and other previously scheduled days off. After careful review, FNS has determined that, because the unanticipated pandemic school closures justify continued operation of SSO, such meals may be served when there is an ongoing unanticipated closure due to COVID-19. Indicate on the SSO application the days of the week/weekend meals will be served and make a comment of this request in the Comments from LEA box on the SSO application for approval.

**Q: Is there a site finder map for SSO and SFSP sites?**

A: Yes. The Seamless Summer Options (SSO) Meal Locations map can be found [here](#). A link is provided here to show SFSP map information as well.

## **Seamless Summer Option (SSO)**

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

A: SSO offers school food authorities operating the NSLP or 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 site eligibility requirements. In order for a school site to serve meals during the traditional summer break or during an unanticipated school closure, they must do so under the SSO.

**Q. Can an LEA or site sponsor that participates in both SFSP and SSO provide meals through SSO or SFSP to each participant? Do the programs have to be operated at the same site or different sites? Can participants pick up multiple meals at once?**

A: If approved to operate both programs, a school can locate them at the same or at different sites. The LEA or community organization may allow children to pick up multiple meals from each program at one time. However, the maximum number of meals that may be offered to each child may not exceed the number of meals allowed by each program. Under SFSP and SSO, up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper, are allowed. If the LEA or community organization is operating both programs at the same site and all the meals for both programs are picked up at the same time, each program must keep accurate meal counts and claim only the meals served for that specific program. The State agency may approve a plan that includes pick-up of meals for multiple days, up to one week at a time.

**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 area eligible based on school data?**

A: With new authority provided by the Families First Coronavirus Response Act, schools operating the SSO are eligible to apply 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 to operate open sites. 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](#). This waiver has been extended through August 31, 2020.

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

A: This waiver allows FNS to waive the requirement that open sites must be located in areas where at least 50 percent of NSLP participants are eligible for free or reduced price meals. LEAs that do not meet the 50 percent area eligibility criteria must request for the ability to operate under the authority of this waiver as open sites for the purposes of serving and claiming meals during COVID-19-related school closures. COVID-19 school closures also include meals served during the traditional summer months. This waiver will automatically qualify any site with 45 percent or higher free reduced price (FRP) eligibility at any point during the 2018-19 SY or 2019-20 SY, according to claims for reimbursement. If your site is less than 44.9 percent, you will need to justify, by uploading documentation, the reason why the site should qualify. Once you have been approved for the waiver you don’t need to apply again for the extension.

Example documentation:

- unemployment increase in the area (see Local Area Unemployment Statistics)
- increased number of positive cases of COVID-19 in the area
- need to offer service at additional sites in order to limit the risk of exposure at operating open SSO sites
- increased financial hardship for families in the surrounding area
- need to offer meals at additional sites due to significant increase in meals served.

The completion of this waiver allows LEAs to request approval for up to eight sites at a time. If you wish to request approval for more than eight sites, you will need to complete the waiver once for the first eight sites, and then again for any sites in addition to these eight.

**Q: How can I offer meals under a Closed Enrolled site?**

A: Schools may serve meals to an identified group of children through age 18 who are participating in a specific program or activity. At least 50 percent of the children enrolled at the site are approved for free or reduced price school meals, or documentation (such as census data) indicates that the site is located within the geographical boundaries of a school attendance area with at least 50 percent of its children approved for free or reduced price school meals. Meals are offered for free to students enrolled in an activity.

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

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 and eligible for free and reduced price meals. Meal participation is targeted towards the free and reduced students in a closed enrolled site; however, paid students that arrive for meal service should not be denied a meal. These meals are all claimed at the free reimbursement rate.

**Q: What is the definition of a specific program or activity to participate in a closed enrolled site?**

A: A closed enrolled site must provide another specific program or activity outside of summer school in order to operate SSO during a normal summer break, such as childcare, day camp or a summer enrichment program. Accredited summer schools do not qualify as closed enrolled sites under the SSO.

**Q: Can “paid” students be enrolled at a closed enrolled SSO site? Is the student turned away?**

A: Schools operating as closed enrolled sites are permitted to enroll children who are eligible for paid meals as well as children who are eligible for free and reduced price meals, as long as 50 percent or more of the enrolled students are certified as eligible for free or reduced price meals. As a closed enrolled site, the school will need to confirm the eligibility of each enrolled student as free, reduced price or paid to ensure it meets the 50 percent threshold. All meals are claimed at the free reimbursement rate, even though a “paid” student can participate.

**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: What are the requirements for schools serving community children?**

A: If an LEA plans to offer summer meals to the community, the SSO program allows the LEA to feed children in area eligible locations where at least 50% or more of the children qualify for free or reduced-price meals during the traditional summer break, school breaks longer than 10 school days or an unanticipated school closure. LEAs may sponsor school and/or non-school sites.

**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: How do I complete or revise the school application for SSO?**

A: Complete the SSO application on the [DESE Web Application system](#). Eligibility requirements are based on site type:

- Open: Located in an eligible area and open to all children through age 18 in the community
- Closed Enrolled: 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. Specific program or activity required. Contact DESE FNS for 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: Can households make changes to their free and reduced price meal application during COVID-19?**

A: Yes. Meal eligibility changes are happening rapidly during this time. Parents/guardians should be made aware of the opportunity to make changes to the meal application due to decreased income and/or employment status. Applications can be distributed during meal service or households can call in and make verbal changes to a current meal application.

## **Meal Service Options**

**Q: Do home delivered meals have to be shelf stable?**

A: No. The type of meal offered will depend on the resources and capacity of your operation. Those that have resources to prepare ready-to-eat meals and have the capacity to deliver meals daily, in a way that meets food safety requirements, may do so. Schools may provide bulk items as long as individual meals are easily identifiable as a reimbursable meal. Consider whether households have access to refrigeration, stoves, microwaves, etc. when providing food that requires refrigeration or further preparation. Schools should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

**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: The Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs is available for schools to apply. [The SFA/LEA must apply online here](#). Meals can only be claimed for reimbursement through utilizing the SSO during COVID-19. SSO follows the same meal pattern as NSLP and SBP and Afterschool Snack. The approval process will include virtual or phone call technical assistance, assigned by your area Nutrition Program Specialist (NPS) immediately following completion of the online waiver request. Prior to implementation, the SFA must receive appropriate technical assistance with an assigned NPS.

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

A: Yes. Amid this public health emergency and given widespread school closures, elementary schools operating FFVP may serve fresh fruits and vegetables to students at the time the operators determine to be appropriate. A waiver is not necessary to exercise this flexibility. Schools operating FFVP may serve in a non-congregate setting, including via home delivery and may provide the FFVP service alongside other Child Nutrition Program meals. FFVP must not be provided to parents or guardians unless they are accompanied by their child(ren). If the site operating FFVP is an open site, FFVP foods may be provided to any children attending the site. Elementary schools operating FFVP that are providing multiple days of meals at one time may also provide multiple servings of FFVP foods at one time. FFVP produce may be donated in your community if the produce cannot be used. If SY 2019-20 FFVP funds are not spent by the end of the fiscal year, the funds will be recovered for use in the next fiscal year. Schools may use their remaining funds to continue to purchase fruits and vegetables, as well as for administrative expenses of the program as allowed. Additional information can be found in the [USDA document here](#).

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

A: No. The [Parent/Guardian Meal Pickup Waiver](#) removes the rule preventing parents and guardians from picking up meals for their children, as long as they protect accountability and integrity of the program. The SFA must indicate on the SSO application the intent to participate in the waiver to allow parent/guardian meal pickup for their children. However, FFVP must not be provided to parents or guardians unless they are accompanied by their child(ren). Please submit the following information to your regional [Nutrition Program Specialist](#):

- LEA Name
- Agreement Number
- Description of parent pickup plan
- Number of sites offering parent-guardian pickup and site names
- A description of how this waiver improved services to program participants

**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. [Nationwide Waiver to Allow Meal Service Time Flexibility in the Child Nutrition Programs](#) allows schools operating SSO the flexibility on the distribution approach, which may include meals for multiple days. The school should consider the capacity to execute such an approach effectively, including meeting food safety requirements and restocking inventory. The distribution approach and meal service times must be indicated on the Seamless Summer Application for COVID-19 completed through the [DESE Web Application log in](#).

**Q: Can I offer an Afterschool Snack?**

A: [Nationwide Waiver of the Activity Requirement in Afterschool Care Child Nutrition Programs](#) waives the requirement that afterschool snacks must be served in a school or program with an educational or enrichment purpose. Waiver is applicable for LEAs currently participating in Afterschool Snack Program (ASP). If the LEA is not already participating in the ASP, this waiver will not apply. Program snacks will be claimed through the regular NSLP claim. For more guidance contact DESE FNS.

**Q: What is the number of meals I can serve under SSO?**

A: Two meals for most sites, the same as SFSP. DESE FNS allows flexibility on meal service procedures, including meal service times and number of meals offered during COVID-19. Afterschool snacks are only reimbursed for LEAs currently participating in the ASP through NSLP.

**Q: Can we still implement offer vs. serve (OVS) for grab-n-go meals?**

A: Yes. Allowing the student to decline food components such as a half cup fruit and/or milk could help eliminate food inventory and food waste barriers. Signage in the pick-up line or emails to the households with instructions on how they can decline a food item are options to implement OVS.

**Q: Where can I find resources for social distancing approaches to meal service?**

A: Resources are available here [DESE SSO Meals and Safety Resources During COVID-19](#). The School Nutrition Association (SNA) Member Resources has also shared [COVID-19 information here](#). USDA has also provided information on their website [here](#).

**Q: Do I need to use a production record for SSO meals during COVID-19?**

A: Yes. Records of food production must be documented daily and retained for record retention requirements.

**Q: What kind of meal participation record should I use for meal counts?**

A: Meal count total per day must be documented for claiming purposes. A manual or electronic document can be utilized to count meals served per day. The [daily meal count form here](#) is acceptable. Records must be retained.

**Q: What is the Meal Pattern Waiver?**

A: This waiver applies to meal pattern components required under the NSLP and SBP for the purpose of providing flexibility to the meals served during COVID-19. Requests will be considered that are targeted and justified based upon disruptions to the availability of food products. FNS will be ready to provide technical assistance and to offer alternatives to the greatest extent possible. [The meal pattern waiver can be accessed here](#).

**Q: Will meal pattern waivers affect a program operator’s responsibility to make meal modifications for participants with disabilities?**

A: During this public health emergency, program operators are not relieved of their obligation to provide meal modifications for participants with disabilities. When planning a non-congregate meal service, program operators should consider how individuals who require meal modifications will be identified and served.

**How do Schools Claim SSO Meals?**

**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 of meal counts must be retained. Meals are reimbursed at the appropriate NSLP and SBP free rates for all attending children. When claiming meals during a COVID-19 closure, you will need to enter them under Claim entry-Seamless Summer. You will enter regular claims as normal. In March, you will have some claims that will be entered like normal and some that will be entered through the Seamless Summer claim entry.

Claims are due the 15th of the month. If you have any questions about claims, please contact Becky Hart in DESE FNS at 573-751-4402.

**Q: Do I claim Afterschool Snack Program snacks on the SSO claim?**

A: No. ASP snacks will be claimed on the regular NSLP claim. Snacks will be claimed in the appropriate benefit category the site is eligible for, following regular program procedures.

**Q: What are the reimbursement rates under SSO? What is the age requirements for children participating?** A: Breakfast and lunch 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. Reimbursements Rates are posted [here on the DESE FNS website](#).

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

A: We recognize that challenges presented by the current public health emergency may delay the submission and/or adjustment of claims for reasons falling beyond the local agency’s control. 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.

**Q: What revenue code do I use for the reimbursement I received for meals served during school closure?**

A: Meal claims submitted for reimbursement for meals served during the month of March, including the NSLP and SSO meals, are reimbursed with CARES Act Funds. See [Revenue Code and Project Code Changes for CARES Act Funds](#) in the updated FY 2020 Missouri Financial Accounting Manual. CARES Act Funds will be used to reimburse claims submitted for the payment months March-September. Please pay close attention to the accuracy of meal counts submitted for each month. If a revision is required and results in an overpay that occurred during these payment months (March-September), funds overpaid will be collected by DESE FNS through a check only.

**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 cost for transportation using school food revenue. 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. For additional meal service guidance for initiating home meal delivery for a household see the [USDA Questions & Answers: COVID-19 Summer Food Service Program \(SFSP\) and Seamless Summer Option \(SSO\) document](#).

## **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. 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.

## Compliance

### **Q: What records must be retained during COVID-19?**

A: The LEA must retain all records that are regularly required including, but not limited to the following:

- Daily meal count records
- Direct Certification download record
- Meal production records
- Food safety temperature logs
- Free and Reduced price meal applications
- Procurement documents, invoices, bill of lading and receipts

### **Q: Has there been an extension to the CEP notification requirements?**

A: Yes. The [Nationwide Waiver of Community Eligibility Provision Deadlines in the National School Lunch and School Breakfast Programs](#) waives the deadlines relating to CEP reporting and election during COVID-19.

CEP Requirement	Annual Deadline	Waiver Deadline
Data used to calculate Identified Student Percentage (ISP)	April 1	Anytime April 1 – June 30, 2020
LEA Notification	April 15	June 15, 2020
Elect CEP for Following SY	June 30	August 31, 2020

### **Q: If my LEA was scheduled for an Administrative Review (AR), will we still get one this year?**

A: No. Administrative Reviews that have not yet been conducted on-site will be rescheduled to SY 2020-21. If you currently have an open AR, our staff recognizes this may be a difficult time to get items completed. We ask that you do the best you can to provide the essential documents needed to close the review. Adequate time will be given to complete the compliance items.

### **Q: Due to the unanticipated school closure, is there flexibility for the triennial assessment requirement of the local wellness policies?**

A: Yes. The nationwide waiver for triennial assessments, originally due June 30, 2020, now allows schools that are unable to complete a triennial assessment of the local wellness policies this year the flexibility to wait and complete this assessment next school year. Please submit the following information to your regional NPS (a list of NPS and their contact information can be found on the [Food and Nutrition Services](#) website):

- LEA Name
- Agreement Number
- Anticipated Completion Date of Local Wellness Policy Assessment
- LWP Contact, email or phone
- A description of how this waiver improved services to program participants

### **Q: What are the monitoring requirements for SSO?**

A: LEAs are required to review each SSO site at least once during its operation. The LEA must review the site's compliance with meal counting, claiming, menu planning and food safety requirements. The On-site School Review for Seamless Summer Option form is located [here](#) on the DESE FNS website.

### **Q: Has there been any flexibility for Food Service Management Contracts (FSMC) that may expire by or around June 30, 2020?**

A: Yes. The nationwide FSMC waiver allows flexibility to extend the current contract through SY 2020-21 (June 30, 2021).

**Q: Can I automatically extend my current contracts with vendors another year?**

A: Under Procurement regulations 2 CFR 200.320(f)(2). (f) Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

1. The item is available only from a single source;
2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.

The use of emergency noncompetitive procurement may be used to negotiate a one-year extension to current contracts. The school district's procurement plan should include guidance in an emergency situation. An addendum must be used for any changes made to contract terms and conditions. Changes that anticipate a material change or significant added value should be competitively procured.

## **Pandemic Electronic Benefit Transfer (P-EBT)**

**Q: What is P-EBT?**

A: Under the Families First Coronavirus Response Act of 2020, families that qualify for free or reduced lunch at school may be eligible for a new benefit of up to \$302 per child (Pre-Kindergarten – Grade 12), known as the Pandemic Electronic Benefits Transfer (P-EBT) program, to help with food costs while students continue to learn at home. P-EBT helps cover food costs for children not in school due to the COVID-19 pandemic who previously received free or reduced lunch at school. The benefits are loaded to an EBT card. For more information on the EBT card, visit: [mydss.mo.gov/food-assistance/ebt](https://mydss.mo.gov/food-assistance/ebt).

**Q: Who is eligible?**

A: Students who received free or reduced price school meals through the NSLP. Students whose status has changed and now qualify for free and reduced price meals amid the closure are also eligible. For students who received SNAP prior to the school closing, the additional benefits will automatically be loaded to the existing EBT card with no application process. Students who received free meals through a school that participated in the Community Eligibility Provision (CEP).

**Q: How do students apply to get benefits?**

A: DESE released important documents to all school districts about the application process and how to distribute the application and necessary information to families in the district. DESE's P-EBT information and these important documents can be found [here](#). The school district must release the application to all families in the district. DESE staff will not be able to track the status of a P-EBT application. Families with questions can call 855-373-4636.

If your school district has not sent out the important P-EBT information to families in the district you must do so immediately. The deadline for families to apply has been extended to July 7th, 2020. Please contact DESE FNS team members with questions at 573-751-3526 or via email at [foodandnutritionservices@dese.mo.gov](mailto:foodandnutritionservices@dese.mo.gov).