COVID-19 Update

Child Nutrition Program Meal Service during COVID-19 Outbreaks
September 17, 2020

Thank you to all who participated in the Town Hall Meeting on September 15th. We have answers for some of your questions and are still awaiting answers for others as noted below. Sponsors can now opt-in to serve meals free to all children through the Summer Food Service Program (SFSP) or the NSLP Seamless Summer Option (SSO) retroactive to the start of the school year based on COVID Responses #56 and #57. Reminder: If a Sponsor opts for retroactive reimbursement for all free meals back to the beginning of the school year, any meal payments collected would need to be refunded.

Contact your area Child Nutrition Consultant (CNC) to begin the process or use the following steps outlined below to revise August NSLP claims and switch to claiming SFSP meals for August (for sponsors in approved status for NSLP and SFSP, with NSLP claims in approved status, but not yet paid). We strongly encourage you to call your CNC to walk through these steps together in KN-CLAIM, as multiple steps require CNC review/approval and individual sponsor steps may differ slightly.

1. Revise SFSP PY20 Sponsor Application
   a) Update Operating Dates (field 27) and any other information that needs to be changed
   b) Check box at bottom of sponsor application to submit to CNC for approval
   c) Click Save

2. Email CNC for:
   a) SFSP Sponsor Application Approval
   b) Open back up SNP PY21 August claim (if in approved status)

3. CNC will email/call sponsor once SFSP sponsor application is in approved status

4. Delete August SNP Site Claim and Sponsor Claim

5. Revise SNP Site Applications
   a) Remove August – December as Months of Operation (fields 10-13) and any other information that needs to be updated (do NOT remove months of operation for sites participating in FFVP in PY21)
   b) Save (site application will go into pending submission status)
   c) Edit site application
   d) Check box at bottom of site application to submit to CNC for approval

6. Revise SFSP Site Applications
   a) Update number of operating days per month and meal service details
   b) Save (site application will go into pending submission status)
   c) Edit site application
   d) Check box at bottom of site application to submit to CNC for approval

7. Email CNC for:
   a) SFSP Site Application Approval

8. CNC will email/call sponsor once SFSP site application is in approved status

9. Enter in claim for SFSP for August
**SFSP Daily Meal Count Form Examples – Resource Now Available**

**SFSP Monitoring Requirements:**
- Pre-operational visits are required for new Child Nutrition Program (CNP) sites and at those sites that experienced significant operational problems in prior year.
- First week visits have been waived for sites that have operated successfully in the previous year and sponsors that successfully participate in the SFSP, CACFP or the NSLP.
- Monitor Site Review must be completed in the first four weeks of SFSP operation for each site operated under the sponsor, including racial/ethnic identification.
  - Can be conducted as a desk audit.
  - SFSP runs on a calendar year. If a monitor site review was conducted in March for a specific site another monitor site review would not be required for that particular site even if there was a gap in service.

**CACFP At-Risk Afterschool Meals Reminders**
- At-Risk snacks/suppers served congregately must be served after the school day has ended.
- An At-Risk snack/supper can be served non-congregately at the same time breakfast and lunch is served non-congregately if a CACFP non-congregate waiver is completed.
- An At-Risk snack/supper can be sent home at the end of the school day if a CACFP non-congregate waiver is completed.
- A site MUST qualify to participate in CACFP At-Risk. There is not an area Eligibility waiver for CACFP at this time. For a site to be area eligible for CACFP At-Risk Afterschool Meals, the site must be located within the boundaries of a school that at least 50% of the student population qualifies for free and reduced price meals.

**Q & As from the Town Hall**

**Q. What should the Summer Food Service Program Adult Meal Charge be for non-Program adults?**
A. The calculation of the meal costs should be based on the full cost of preparing the meal, including the food, supplies, labor and other costs paid for by the sponsor. In the Summer Food Service Program, the adult meal price can be lower than the current SFSP reimbursement rates because the price of the meal should be based on cost. If cost data is not available, you can use the average reimbursement for the SFSP meal which is $4.15 for lunch and $2.40 for breakfast.

**Q. Can the Special Milk Program operate in addition to the SFSP/SSO?**
A. Yes this is okay in the specific instance authorized by §215.7 Requirements for participation.(a)
Any school or nonprofit child care institution shall receive the Special Milk Program upon request provided it does not participate in a meal service program authorized under the Child Nutrition Act of 1966 or the National School Lunch Act; except that schools with such meal service may receive the Special Milk Program upon request only for the children attending split-session kindergarten programs who do not have access to the meal service.
Q. Can the National School Lunch Program (NSLP) Afterschool Snack Program operate with the Seamless Summer Option (SSO)?
A. Yes, because SSO is part of the NSLP. As long as school is in session, and the school is offering an afterschool program, the afterschool snack program may be operated with SSO. Schools operating SSO, can do either CACFP Afterschool At-Risk (following At-Risk requirements) or NSLP Afterschool Snack (so long as school is in session). Schools continuing to operate under NSLP can do either CACFP Afterschool At-Risk (all requirements being met - a site must qualify to do At-Risk) or NSLP Afterschool Snack (all other requirements being met).

Q. Can the National School Lunch Program (NSLP) Afterschool Snack Program operate with the Summer Food Service Program (SFSP)?
A. Question has been sent to USDA National Office. In the meantime, Sponsors operating SFSP CAN do CACFP Afterschool At-Risk (all requirements being met- a site must qualify to do At-Risk). Reminder: Afterschool snacks must be accompanied by an educational or enrichment activity but flexibility has been provided to offer it virtually: Note: Under sections 17(r)(2)(B) and 17A(a)(2)(C) of the Richard B. Russell National School Lunch Act, 42 U.S.C. 1766(r)(2)(B) and 42 U.S.C. 1766a(a)(2)(C), respectively, afterschool meals and snacks must be served in a school or program with an educational or enrichment purpose. FNS regulations further require at 7 CFR 210.10(o)(1)(ii) and 7 CFR 226.17a(b)(1)(ii) and (iii), eligible schools and at-risk afterschool care centers to serve afterschool meals and snacks in a structured and supervised environment, with an educational or enrichment activity. Because the enrichment or educational activity has not been waived, please reference alternate options in SP 24-2020 #18.

Q. During COVID-19 how may we offer the enrichment activity if we are operating in a non-congregate setting for social distancing and safety?
A. At-risk afterschool care centers providing non-congregate meals under Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Program – Extension #2 must comply with the requirement to provide an education or enrichment activity (7 CFR 226.17a(b)(1)). However, under the non-congregate and parent pick-up waivers, these activities may be conducted virtually or in other non-congregate ways. Program operators may consider offering online homework assistance, activity packets, electronic games and books, or other e-learning activities for the children to partake in at home. For example, Team Nutrition offers a variety of online games, books, and nutrition education activities for children at: https://www.fns.usda.gov/tn/digital-nutrition-resources-kids. Although children are not required to participate in or complete the activity in order to receive an afterschool meal or snack, the afterschool care center must offer the activity.

Q. Must sponsor-conducted Afterschool Snack Program (ASP) site reviews, that are required in 7 CFR 210.9(c)(7), be completed on-site?
A. The regulations requiring that Sponsors that operate the Afterschool Snack Program (ASP) review each program two times a year as outlined in 7 CFR 210.9(c)(7) does not specify that the review is on-site. Therefore, the review can be conducted off-site. In addition, the intent of the CNR #41 waiver is to allow for social distancing and reducing the number of people coming into contact with each other in the school setting while maintaining program integrity through monitoring off-site. Thus CNR#41 allows that any on-site visit or review may be conducted off-site.
Q. Can traditional CACFP operate for Pre-K students or children in the Sponsor’s Child Care program?
A. Yes. The traditional CACFP can continue to provide up to two meals and a snack for children attending a child care program. A sponsor may also still offer SFSP/NSLP for school age-students as these are two separate groups of children.

Questions Still at USDA National Office for Response
Q. Can a Sponsor offer breakfast and lunch through the SFSP or SSO and then either a morning or an afternoon snack through the CACFP?
Q. Can a RCCI with day students participate in the SFSP?

What we do know related to Pre-K and Child Care meals and snacks:
- Child Care Centers within school districts can stay on the CACFP and claim 2 meals and a snack and the rest of the school district can be on SFSP or SSO.
- PRE-K students can receive Breakfast, Lunch and a Snack through the CACFP OR they can receive Breakfast and Lunch or Breakfast and Snack or Lunch and Snack through the SFSP or NSLP/SSO.

Kansas Sponsors continue to do a phenomenal job in providing meals during the pandemic whether students are in school, learning remotely or hybrid. Feeding America estimates that Kansas will see a 47.6% increase in child food insecurity statewide due to the novel coronavirus. Many Kansas counties have a much higher projected percent increase in child food insecurity. Your work is crucial during this time of economic uncertainty and increase in child food insecurity- you are providing the safety net of nutritious meals for Kansas children.

Cheryl, Jill and Julie

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