



School Meal Service During SY20-21

Q&A

MEAL SERVICE

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

As of July 23, 2020, this is correct.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

OFFER VERSUS SERVE

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

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

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

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

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

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

24. Can I use OVS meal service in some schools and not in others?

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

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

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

MEAL PATTERN

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

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

27. Will there be flexibility to meet vegetable subgroups?

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

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

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

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

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

ONLINE LEARNING

30. 4-day school week: If we have afterschool on Friday for part of the day, can we provide meals for those students who come to that program on that day?

SFAs operating under a 4-day school week, can only serve NSLP or SBP meals for those 4 school days. A district may apply to participate in the CACFP At-Risk Afterschool program on non-school days during the school year if the school(s) offer an afterschool program with educational enrichment activities. In the CACFP At-Risk Afterschool program, up to one meal and one snack may be served and claimed per student per day. Please contact Kim Sherman at ksherman@sde.idaho.gov for more information about the program.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

GENERAL QUESTIONS

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

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

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

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

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

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

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

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

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

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

46. Will water still be required during lunch service?

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

47. Is providing potable water during meal service still a requirement for NSLP in SY20-21?

The State agency submitted a waiver request to USDA for the requirement for the next school year, however at this time the waiver has not been approved

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

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

- 49. Can students eat outside as weather allows to encourage social distancing?**
Participation in the USDA School Meals Programs allows SFAs to feed students in multiple settings including outdoors.
- 50. Will food service staff be required to wear masks during service of food this year or will this determination be made by our local health district?**
The State agency recommends following CDC and your local health district guidelines.
- 51. Can a district refuse to accept cash payments and only allow people to pay on-line?**
District's must have alternate methods of payment for households with no internet access or those qualified for reduced price meals if an additional fee is charged for online payment processing. A processing fee would not be an allowable charge for reduced priced eligible students.
- 52. Will reviews for SY20-21 be postponed until the following year?**
The State agency submitted a waiver request for administrative reviews for SY20-21, however at this time the waiver has not been approved.
- 53. Are transportation costs related to bus routes/meal drop offs an eligible expense to claim for the rebound money?**
Transportation costs are an allowable expense in SFSP. Please complete the *Idaho Rebound Funding Questionnaire* sent via broadcast email on July 22, 2020 to assist the State agency in assessing sponsor needs due to budget impacts associated with COVID-19 operations. The State agency is currently working on the details of the funding guidelines.
- 54. Is the fuel for feeding children via bus routes an allowable food service expense?**
Yes. However, the child nutrition program's budget must be able to bear this cost without jeopardizing food quality. School district's operating under Special Provision Programs must be aware that their district's general funds may already bear the burden of making the CNP budget whole at the end of each fiscal year.
- 55. Are the fuel/bus expenses eligible for the emergency funding for COVID April/May?**
Please contact the State agency to discuss these expenses. It is possible that the school district already received reimbursement for the expenses through another funding stream which would preclude fuel/bus expenses from future reimbursement. The State agency can be reached by calling (208) 332-6800 or via email at childnutrition@sde.idaho.gov.
- 56. Where is the Central District Health Document?**
[Central District Health Department Guidance](#)
- 57. When will we receive an approval letter regarding nationwide waivers we opted into?**
The State agency will be reviewing the waiver responses provided by each SFA which are due by August 14, 2020. Once reviewed, SFAs will receive a letter confirming the waivers they have chosen to implement. If an SFA does not receive a State agency response to the *Waiver Opt In Form* by August 21, 2020, please contact childnutrition@sde.idaho.gov.
- 58. We have pushed our start date out do I need to change that in my NSLP application?**

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

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

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

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

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

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

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

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

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

TOWNHALL Q&A - AUGUST 26, 2020

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

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

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

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

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

We are currently at Target Level 2.

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

Correct.

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

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

6. **Under a "serve" scenario, we are forced to purchase individual to-go containers and lids for each food group which has significantly increased costs - what is the best way to proceed with waivers (must we request to exclude an entire food group)?**
While packaging concerns can be a justification for a meal pattern waiver, a request to exclude an entire component would require supplemental documentation for State agency review prior to approval.
7. **When considering lunch deliveries, is buying something to keep some items warm and some items cool, an allowable cost?**
Yes, it is reasonable to purchase equipment to maintain food safety following proper procurement procedures. If the SFA plans to purchase items costing more than \$5,000, a Capital Expenditure Request must be submitted and prior State agency authorization is needed.
8. **Is there is a current waiver to send home meals for multiple days?**
Yes, when used together both the Nationwide Waiver to Allow Meal Service Time Flexibility and Nationwide Waiver to Allow Non-congregate Feeding permit meal delivery for multiple days.
9. **How do we know if we filled out all the waivers we needed to?**
The State agency sends out waiver notification letters as requests are reviewed and approved.
10. **If we go to yellow stage which is A/B days, do I have to request a waiver to feed those students on the days they are not in school?**
Yes, when used together both the Nationwide Waiver to Allow Meal Service Time Flexibility and Nationwide Waiver to Allow Non-congregate Feeding permit serving students for days they are not physically at the school building.
11. **Can daycares pick up meals for multiple students?**
No, daycare providers are not guardians and therefore cannot pick up meals on behalf of students.
12. **Are sodium levels different if we operate a 4-day week?**
No, sodium is a weekly average. The average is the same regardless of how many days meals are provided.
13. **We are implementing a pre-ordering system and would like to require households to order both a breakfast and lunch together for ease of packaging and delivering; is this allowed?**
No, per 7 CFR § 210.10, students must be offered a meal and are not required to take two meals.

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