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## School Nutrition Programs COVID-19 Frequently Asked Questions: Volume 3

Updated May 27, 2020

1. **Question:** Are we required to conduct monitoring for our SFSP and SSO sites?

**Answer:** On March 28, 2020 USDA waived the on-site monitoring requirements in Summer Food Service Program (SFSP) and Seamless Summer Option (SSO). This waiver remains in effect until June 30<sup>th</sup>, 2020 or until the expiration of the federally declared public health emergency. Sponsors should, to the maximum extent practicable, maintain oversight through a “desk audit” by assessing paperwork, like meal count forms and meal pattern documentation. Please see the complete [Nationwide Waiver of Onsite Monitoring Requirements for Sponsoring Organizations in the Summer Food Service Program](#) on the USDA policy memos page.

On April 9<sup>th</sup>, USDA issued guidance clarifying that the 4-week monitoring is still required, but does not need to include a site visit. Child Nutrition Programs is working to provide an updated monitoring form that may be used for an off-site 4-week monitoring visit. Please see questions 22-24 of [SP 11-2020, CACFP 06-2020, SFSP 05-2020](#) for more on monitoring requirements.

2. **Question:** May we serve and be reimbursed for meals over Spring Break?

**Answer:** Yes. USDA provided verbal guidance on April 4<sup>th</sup> that meals could be served and claimed during previously scheduled breaks and holidays with no additional actions needed. We expect to receive written guidance to this effect from USDA shortly.

3. **Question:** If we are sending home multiple days of meals at a time, may we provide bulk food for the household to assemble the meals, such as a loaf of bread and peanut butter or a box of cereal?

**Answer - Updated 4/13/20:** On April 12<sup>th</sup>, USDA provided updated guidance that bulk items may be provided as long as individual meals are easily identifiable as a reimbursable meals (SP 13-2020). To accomplish this, we recommend including a menu with the items that identifies which items and quantities are to be used to make up each meal. This flexibility is available for all of the child nutrition programs operating during COVID-19. The guidance also specifies that program operators:

- Must include the required food components in the proper minimum amounts for each reimbursable meal being claimed;



- Must ensure that food items are clearly identifiable as making up reimbursable meals;
- Are strongly encouraged to provide menus with directions indicating which items are to be used for each meal and the portion sizes;
- Should consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Should ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

SFSP sponsors utilizing Food Service Management Companies must submit a unitized meal waiver to the Agency of Education to use this flexibility. Contact [Jamie Curley](#) for a copy of the waiver form.

**4. Question:** When must we add a separate Site Application in our Application Packet?

**Answer:** Aside from delivering to households and bus stops, you must have a separate Site Application for each site where meals are served. If you plan to stay at a bus stop for at least 30 minutes, please list it as a separate site. If you are delivering meals to a childcare center, you must add the center as a site and ensure they are not also planning to claim reimbursement for those meals. Please contact Jamie Curley at [jamie.curley@vermont.gov](mailto:jamie.curley@vermont.gov) or (802)-828-2010 with specific questions about when to add a separate site.

**5. Question:** If we are offering breakfast and lunch at the same time, do we need separate Meal Times in questions B3 for Breakfast and L3 for Lunch in the Site Application?

**Answer:** If you are offering breakfast and lunch at the same time and have one time that you are allowing folks to pick up grab n' go meals, you may enter that time period as your Meal Time for both breakfast and lunch in question B3 for Breakfast and L3 for Lunch in the Site Application.

**6. Question:** Will the claim deadline be extended beyond the 60-day claiming deadline during COVID-19?

**Answer:** USDA released a nationwide waiver on April 1, 2020 that waives the 60-day claim deadline for the January and February 2020 claim months. Deadlines for these two claims months are extended for 30 calendar days from their original required date of submission. The January 2020 claim for reimbursement must be submitted on or before April 30, 2020 and the February 2020 claim for reimbursement must be submitted on or before May 29, 2020. Sponsors are still encouraged to submit claims in a timely manner.

**7. Question:** How do we submit a claim for reimbursement under SFSP during an unanticipated school closure?

**Answer:** The claim for reimbursement process for SFSP during an unanticipated school closure is the same process as regular SFSP. For reference, please see the PowerPoint [SFSP During Unanticipated School Closures: Claim Submission Training](#) and the [SFSP Claim for Reimbursement Submission: Illustrated Step-by-Step Guide](#). These are available under the “Resources” section of the Summer Food Service section of our [website](#).

The Claim for Reimbursement payment schedule for 2020 is as follows:

01/02/20
01/16/20
01/30/20
02/13/20
02/27/20
03/12/20
03/26/20
04/23/20
05/07/20
05/21/20
06/04/20
06/18/20
07/02/20
07/16/20
07/30/20
08/13/20
08/27/20
09/10/20
09/24/20
10/08/20
10/22/20
11/05/20
11/19/20
12/03/20
12/17/20
12/31/20
01/14/21
01/29/21

8. **Question:** May Non-Area Eligible sites now be Open sites and serve meals to all children, 18 and under?

**Answer:** Yes! On March 29<sup>th</sup> the USDA approved Vermont’s waiver of area eligibility requirements. Under this waiver, we will be allowing any school in the state that has participated in any of the Child Nutrition Programs during the last two years to be an Open site under the Summer Food Service Program (SFSP) or the NSLP Seamless Summer Option (SSO). Open sites can provide meals to *any* child, age 18 and under, and the sponsor may claim federal reimbursement for all meals served. The waiver is retroactive to March 20, 2020. Sites that were formerly participating in the SFSP/SSO as

Non-Area Eligible locations can now claim and be reimbursed for meals served from March 20<sup>th</sup>, forward. Please see the [Waiver of Area Eligibility Requirements for SFSP/SSO During COVID-19](#) for guidance on how to amend SFSP applications or add new Open sites. The Child Nutrition Programs team is standing by to approve updated applications and provide technical assistance.

**9. Question:** What information must be provided with the meals?

**Answer:** Meals should include the below information. If multiple meals are distributed to a household at one time, only one label or sheet of paper needs to be provided with the group of meals.

- If the “And Justice for All” poster is not able to be displayed when families receive the meals (i.e., the meals are delivered to households), the short version of the USDA non-discrimination statement should be included. The short form of the statement is “This institution is an equal opportunity provider.”
- If meals are perishable, pertinent food safety information must be included, such as refrigeration/reheating instructions, and expiration dates. This [one-page label from Lunch Assist](#) includes some examples of good food safety language that could be used.
- If the children are not going to be present when picking up or delivering meals, include a statement or label that the meals are intended for consumption by children age 18 and under.

**10. Question:** What should we do about staff shortages due to illness?

**Answer:** The AOE recommends a number of steps (below) to prevent the spread of illness among staff. In addition, programs may consider hiring local restaurant workers who are temporarily unemployed as substitute food service workers. Community volunteers may also be used to prepare or distribute meals. We recommend following existing school processes for onboarding and screening volunteers. Please be aware of protecting identifying student information, including student addresses, from volunteers, or providing volunteers the appropriate training before such information is shared.

Here are suggestions for preventing the spread of illness among staff:

- Break staff up into smaller teams working out of different kitchens – that way, if you need to close one kitchen because staff are sick/isolating or you need to disinfect it, you can switch the production over to another kitchen.
- Within the kitchen, break staff up into small teams and keep as much distance as possible by moving workstations out into the cafeteria.
- Break staff up into teams – 2 weeks on, 2 weeks off, knowing that they are on call during the 2 weeks off to replace the other team if those folks need to self-isolate or get sick.
- Switch to fewer distribution days. The sponsor just needs to email the Child Nutrition Programs team to do this. We can allow distribution of up to one

weeks' (7-days) worth of meals at a time. Fewer distribution days mean less opportunities for exposure among staff, and between staff and the public.

Please also see the CDC Guidance on [Safety Practices for Critical Infrastructure Workers](#) for more information how to handle situations where essential employees have been exposed to COVID-19.

**11. Question:** Are there additional funds to assist us with equipment?

**Answer:** Yes, the following grants are available to help:

- [GENYOUth](#) is offering a COVID-19 emergency school nutrition grant. The grant is up to \$3,000 per school and can be used for equipment and staff stipends.
- The New England Dairy Council is offering assistance purchasing coolers and other equipment needed to transport meals. Contact Jill Hussels, School Nutrition Specialist, at the New England Dairy Council at [jhussels@newenglanddairy.com](mailto:jhussels@newenglanddairy.com) for information.
- Apply for the spring round of the Vermont Agency of Agriculture [Farm to School Infrastructure Grants](#). These grants reimburse schools and early childhood programs for infrastructure purchases that improve food programs and support farm to school efforts. The deadline to apply is April 19, 2020.

**12. Question:** Will these waivers extend through summer 2020 operation?

**Answer:** The waivers USDA has granted remain in effect until June 30, 2020, or until expiration of the federally declared public health emergency, whichever is earlier. USDA recognizes that there may be a continued need for these waivers, and will assess the situation on an ongoing basis. USDA has authority to extend the nationwide waivers through September 30, 2020, should it be necessary.

**13. Question:** Should we wear face masks during meal preparation and service?

**Answer:** On Friday, April 3<sup>rd</sup>, Vermont Health Commissioner Mark Levine, MD, recommended that Vermonters wear cloth facial masks, or coverings, if they need to leave their homes for essential purposes. The Health Department's new guidance around face masks is available in [a two-page fact sheet](#). It includes examples of when to wear a mask and when you don't need to wear a mask, as well as how to wear them properly and clean them regularly. In summary, the Health Department recommends that all Vermonters wear cloth face coverings when outside of the home to help slow the spread of COVID-19. This advice is based on new data about how COVID-19 can spread before a person has any symptoms.

A mask helps protect others around you if you are infected and don't know it. A face covering is one more important precaution we can take to help slow the spread of COVID-19 – it is not a substitute for physical distancing and other prevention measures.

You still need to stay at least 6 feet away from people, even when wearing a face covering.

The cloth face coverings recommended are not surgical masks or N-95 respirators. Those types of masks are critical supplies that must be reserved for our health care workers and first responders.

[Watch a video](#) of the U.S. Surgeon General demonstrating how to make your own face coverings using items from around your home.

These masks and coverings are allowable costs to the federal Child Nutrition Programs.

**14. Question:** What does it mean to be an essential worker?

**Answer:** School Food Service Personnel are considered essential workers under the executive orders issued by Governor Scott. This means that they may continue to report to work, and that they have access to childcare for essential persons, according to the governor's March 17th [Directive on Provision of Services to Children of Essential Persons During Closure Period in Response to COVID-19](#).

**15. Question:** On April 3, 2020, the Vermont Agency of Education released the memo [Student and Household Information Needed for P-EBT Implementation](#).

We are offering meals to children during the unanticipated school closure - do we still need to supply the information? If we are offering meals, can families still receive the P-EBT benefit?

**Answer:** Yes. Households are eligible for this benefit even when the school is also offering free meals to children during the unanticipated school closure through other child nutrition programs (SFSP, SSO, CACFP). The P-EBT is an additional benefit to households during this critical time. The benefits are not exclusive of each other.

**16. Question:** If families apply (and qualify) for free and reduced meals after the list of students is sent to AOE on April 10<sup>th</sup>, will they still be eligible to receive the P-EBT benefit?

**Answer:** Yes. AOE will supply new language to add to your free and reduced application approval letter. This language will inform families who qualify between April 10<sup>th</sup> and the end of the school year how to contact DCF to receive the P-EBT benefit.

**17. Question:** Is the March Direct Certification list available for download?

**Answer:** The March Direct Certification list was loaded into the edFusion system on Friday, March 27<sup>th</sup> (we were delayed from our usual date of the 20<sup>th</sup> of the month). This means that if the data reporting manager exported the Direct Cert list on March 28<sup>th</sup> or later, your current list should be up to date. However, if you last exported it before the



28<sup>th</sup>, the data reporting manager should export the list again before you supply the P-EBT information to us. There might be additional students who became eligible for free meals as a result of being on the March Direct Certification list. If your data manager is having difficulty with edFusion, they should contact the helpdesk at 802-828-1017 or [AOE.SLDSSupportGroup@vermont.gov](mailto:AOE.SLDSSupportGroup@vermont.gov).

**18. Question:** For staff working from home, what professional standards training opportunities exist?

**Answer:** Many training opportunities are available online, at no cost. We recommend:

- [The Institute of Child Nutrition](#)
- [The Lunch Box](#)
- [Making It Count: School Meals Accountability & Responsibility Training Tools](#)
- [Produce Safety University Training Videos](#)

**19. Question:** Can these trainings count toward School Year 2020-2021 required professional standards hours?

**Answer:** Yes. Per the [Questions & Answers \(Q & As\) on the Final Rule “Professional Standards for State and Local School Nutrition Programs Personnel as Required by the Healthy, Hunger-Free Kids Act of 2010”](#) the State Agency has the discretion to allow training completed between April 1 and June 30 to count toward the current or next school year. AOE is allowing any excess training conducted between April 1 and June 30 to carry over to the following school year. Trainings completed each year may only be counted once, for one year, and not for both the current and next school years.

**20. Question:** Can Fresh Fruit and Vegetable Program (FFVP) funds be used to purchase additional fruits and vegetables for children during the unexpected school closure?

**Answer:** In a Q&A issued on April 9<sup>th</sup>, USDA clarified that FFVP funds may be used to provide fruits and vegetables to children during the closure. However, the Q&A makes it clear that children must be present to receive the fruits and vegetables. Vermont AOE will be submitting a waiver for this requirement, however, unless that waiver is granted children must be present to receive the produce purchased with FFVP funds. Please see [Policy Memo SP-2020 from USDA](#) for more information on how FFVP funds may be used during the unexpected school closure.