

## **Revised! New USDA Waiver Options for School Food Authorities**

Due to the recently issued USDA waivers, IDOE is providing guidance to help School Food Authorities (SFAs) understand their options. All websites, newsletters, and documents are in the process of being updated, but this document will provide meal claiming options for SFAs during this time. This guidance does not apply to Residential Child Care Institutions (RCCIs). SFAs unsure of the best option for their schools should work directly with their field specialist. Options are presented in the order of simplicity; keep in mind there are additional requirements for school nutrition program administrators when selecting Summer Food Service Program (SFSP). The decision as to which option to select rests solely on the local education authority, the need within the local school corporation, the capability of food service staff to provide quality meals, and the approvals of the state agency and local health department. Waivers are only available until December 31 or until funds are depleted, whichever comes first.

### **OPTIONS**

1. Continue to serve meals under National School Lunch Program (NSLP)/School Breakfast Program (SBP)\*
  - a. All SFAs can continue to serve under NSLP/SBP.
  - b. The [School Nutrition Programs meal pattern](#) must be followed, but there are meal pattern flexibilities that are available (i.e. vegetable subgroup flexibilities). Reach out to your field specialist for specifics.
  - c. Feed students based on free, reduced, and paid eligibility status at the Point of Sale.
  - d. No additional paperwork or requirements are needed beyond receiving approval for PY 2021 in the CNPweb under the School Nutrition Programs purple puzzle piece as communicated in recent [newsletters](#).
  - e. Questions about receiving approval for [PY 2021 in the CNPweb](#) for the School Nutrition Programs purple puzzle piece? Contact the State agency using the [CNPweb Help Form](#).
  - f. Check out the [Re-Entry Guidance for School Year 2020-2021](#) for more information on NSLP/SBP.

\* Note: SFAs participating in CEP and currently being reimbursed at 100% free can continue on normal NSLP/SBP without any additional paperwork requirements. SFAs not at 100% free can select SSO option to get reimbursed for all meals at the free rate.

2. Serve meals under Summer Seamless Option (SSO)
  - a. All SFAs qualify immediately to use the SSO waiver.
  - b. The [School Nutrition Programs meal pattern](#) must be followed, but there are meal pattern flexibilities that are available (i.e. vegetable subgroup flexibilities). Reach out to your field specialist for specifics.
  - c. Feed all kids for free and only count the number of meals served at the Point of Sale (i.e. SFAs do not need to count kids by free, reduced, or paid eligibility.).
  - d. Receive the [free School Nutrition Programs reimbursement rate](#) for all meals served to any child 18 years or younger.
  - e. **(Revised 9-14-2020)** Only additional action needed is to update your site information sheets in the [CNPweb](#) under the School Nutrition Programs, purple puzzle piece, to

- indicate implementation of Summer Seamless Option start date **which can be effective the first day of school** (\*See f).
- f. **(Revised 9-14-2020)** If the start date is retroactive, SFAs must refund any paid and reduced meal charges made to student accounts for meals already served in **July, August, and September**.
  - g. **(New 9-14-2020)** If a July and/or August claim has already been filed in the CNPweb and the SFA is wanting to implement SSO for July and/or August when school started, the SFA must revise their site claims and indicate free meals for all students in July and/or August.
    - i. Utilize the [Instructions for Entering an SSO Reimbursement Claim](#) or [Claim Instructions for CEP Schools Operating SSO](#)
  - h. If choosing this option, SFAs are encouraged but not required to conduct monitoring visits.
  - i. Two questions on site information sheets must be determined in advance:
    - i. Is the SFA going to feed the community? If so, indicate an open site.
      1. Open sites can feed kids on non-school days and any child that is 18 years or younger.
    - ii. Is the site only feeding their enrolled students? If so, indicate a closed enrolled site.
      1. Closed enrolled sites can only feed students enrolled at the school, whether on-site or virtual. Closed enrolled sites cannot serve meals to the community.
  - j. If the site information sheet indicates that a site is not eligible or generates an error, the State agency will need to do an override on the system during the approval process.
  - k. Questions about updating the site information sheet for PY 2021 in the CNPweb for the School Nutrition Programs purple puzzle piece? Refer to the **Revised 9-15-2020** [Completing Site Sheets with SSO Fact Sheet](#).
  - l. Check out the [Re-Entry Guidance for School Year 2020-2021](#) website for more information on SSO.
3. **(Revised 9-14-2020)** Serve meals under Summer Food Service Program (SFSP).
- a. **(Revised 9-14-2020)** All established SFAs can qualify and be approved **for PY 2020 and PY 2021 SFSP beginning the start of the school year**. Only two meal services can be offered on SFSP, normally breakfast and lunch.
  - b. Must understand and follow SFSP meal patterns and implement the required [rules and regulations for SFSP](#) including the specific SFSP recordkeeping and monitoring requirements.
  - c. Feed all kids for free and only count the number of meals served at the Point of Sale **(\*See d)**.
    - i. SFAs do not need to count by free, reduced, or paid eligibility.
  - d. **(New 9-14-2020)** SFAs must refund any paid and reduced meal charges made to student accounts for meals already served in July, August, and September if the start day is retroactive.

- e. (New 9-14-2020) If a July and/or August claim has already been filed in the CNPweb under the NSLP/SBP and the SFA is wanting to retroactively implement SFSP for July and/or August after the school year started, the SFA must revise their site claims and enter zero on all their claims and resubmit.
- f. (Revised 9-14-2020) Additional paperwork is needed in the [CNPweb](#) under the Summer Food Service Program, blue puzzle piece, to indicate implementation of SFSP.
  - i. SFAs wanting to update SFSP PY 2020 to claim meals retroactively to the start of school must contact their [Field Specialist](#).
  - ii. For PY 2021 beginning October 1, CNPweb site and sponsor sheets must be fully completed and in pending approval status by September 25, 2020.
  - iii. All SFAs must notify their health department of their sites.
  - iv. All sites managed by FSMC or vendor must be identified as FSMC/Vended in the meal service section of the site application.
  - v. If new to SFSP, the SFA's Permanent Agreement must be updated and returned to the State agency.
  - vi. If new to SFSP, the SFA must complete all required new sponsor training requirements, complete proposed budget and have a preapproval visit with your field specialist.
  - vii. All SFAs must complete a four week monitoring review for all sites and submit copies to your field specialist by November 5, 2020.
- g. Questions to be determined prior to completing site applications:
  - i. Is the SFA going to feed the community? Does the SFA have the employees needed to serve compliant meals as all open sites will be advertised and must be open to the public? Will the SFA grant access to the public to obtain meals? If so, indicate an open site.
  - ii. Is the SFA only feeding their students? If so, indicate a closed enrolled site.
- h. Even if doing SFSP, SFAs must still update their [School Nutrition Programs, purple puzzle piece](#), information in the CNPweb and receive approval under the School Nutrition Programs. Other programs if participating such as After School Snack Program must be approved in the purple puzzle piece for the appropriate operating months.
- i. SFSP is available until December 31 or until funds are depleted, whichever comes first.
- j. Check out the [Summer Food Service Program](#) website for more information on SFSP.
- k. Questions about SFSP? Reach out to your Field Specialist.

**Important Reminders:**

- For all options, free meals apply only to student reimbursable meals; adults must continue to pay for meals.
- All reimbursement received as a result of selecting one of these options must be maintained in the school nutrition program account and used solely for the purpose of improving child nutrition program menus, such as improving nutritional quality and variety of foods, and/or the operation food service through the purchase of kitchen equipment, and/or increased food service salaries and benefits.

- SFAs selling second entrees, second meals, and/or a la carte items may continue to do so at the required pricing as long as they meet the [Smart Snacks](#) requirements.

Questions? Contact your [Field Specialist](#).

Resources:

- [Nationwide Waiver to Allow SFSP and SSO Options through December 2020](#)
- [Nationwide Waiver to Allow Meal Pattern Flexibility in the SFSP and SSO](#)
- [Nationwide Waiver to Extend Area Eligibility Waivers](#)
- [Area Eligibility during the COVID-19 Outbreak](#)
- [Nationwide Waiver to Allow Parents and Guardians to Pick Up Meals for Children](#)
  - [Guidance on Parent/Guardian Meal Pick Up National School Lunch Program/School Breakfast Program](#)
  - [Guidance on Parent/Guardian Meal Pick Up Summer Seamless Option](#)
- [Nationwide Waiver to Allow Non-congregate Feeding in SFSP and the NSLP SSO](#)
- [Nationwide Waiver to Allow Area Eligibility for Closed Enrolled Sites in the SFSP and NSLP SSO](#)
- [Nationwide Waiver to Waive First Week Site Visits in the Summer Food Service Program](#)
- [Nationwide Waiver of Meal Service Time Restrictions in the SFSP and the NSLP SSO](#)
- [Nationwide Waiver to Allow Offer Versus Serve Flexibilities in the Summer Food Service Program](#)
- [Summer Food Service Program and Summer Seamless Option Re-Entry Guidance Frequently Asked Questions](#)
- [National School Lunch Program/School Breakfast Program Re-Entry Guidance Frequently Asked Questions](#)
- **New!** [Nationwide Waiver to Allow Reimbursement for Meals Served Prior to Notification of Approval and Provide Flexibility for Pre-Approval Visits in the Summer Food Service Program](#)
- **New!** [Questions and Answers Relating to the Nationwide Waiver to Allow Summer Food Service Program and Seamless Summer Option Operations through December 2020](#)
- **New!** [Comparison of Programs Chart](#)