



FRAC
Food Research
& Action Center

Webinar Q&A: Serving Meals During COVID-19 — Out-of-School Time Partners

The following questions were submitted during the webinar *Serving Meals During COVID-19 Out-of-School Time Partners* held on March 24, 2020. A recording of the webinar can be accessed [here](#) (Password: *ostCOVID19*).

General

1. *Is there a document that summarizes all waivers and flexibilities for meal sponsors?*

Up-to-date information on COVID-19 and child nutrition program waivers can be found on the U.S. Department of Agriculture's (USDA) [FNS Response to COVID-19 webpage](#). FRAC is also keeping [this page](#) updated as needed.

Schools & Safety

2. *Is there guidance available to ensure food safety and coronavirus-safe practices during service?*

While USDA-FNS has not issued specific food safety guidance related to COVID-19, here are some resources that may be helpful:

- [Practice Safe Hygiene and Cleaning - Institute of Child Nutrition](#)
- [Food Service Safety Precautions - LunchAssist](#)

3. *What are the most common ways people are getting food to students safely without increasing the odds of spreading the virus? How can we stop long lines from forming during meal pick up time slots?*

“Grab and go,” drive-through, and home delivery are all ways to disseminate meals while maintaining social distance. To prevent long lines from forming, schools and sponsors should consider the following strategies:

- Post clear signage, including where to park, where to pick up the meals, and any social distancing measures you want people to take. Include this guidance in meal bags/boxes for future reference.
- Set up the site to require as little personal interaction as possible, maximize space between staff and recipients (aim for at least 6 feet), and reduce the number of items that multiple people will touch.
- Try to have family groups in line keep a 6-foot buffer from each other. Tape lines on the floor to show 6 feet of distance.
- Provide breakfast and lunch for multiple days to limit the number of times families have to be present to receive meals.

Meal Service

4. *Can sites be approved to issue the meals to parents even if the children are not present?*

Parents or guardians are allowed to pick up meals without children present. State agencies are required to create a plan that ensures accountability and program integrity. See USDA's [nationwide waiver](#) (released March 25, 2020) for more information.

5. *Are community-based Summer Food Service Program (SFSP) sponsors able to home-deliver meals?*

According to USDA's [COVID-19 Meal Delivery Using Existing Authority FAQ](#), this option is only available to School Food Authority sponsors of school sites due to student confidentiality and logistical requirements. Schools electing to deliver meals may serve only children who are in area-eligible locations or who are eligible for free or reduce-priced school meals.

Meal Pattern

6. *Are there any waivers for meal components due to issues with availability of products?*

USDA issued a [nationwide waiver](#) that waives the requirements to serve meals that meet the meal pattern requirements. While the waiver is available to all states, program sponsors must submit requests to their state agency for approval that demonstrate disruptions to the availability of food products. The waiver applies to all of the federal child nutrition programs: School Breakfast Program, National School Lunch Program (NSLP), SFSP, and Child and Adult Care Food Program (CACFP; all components).

Emergency Child Care Centers

7. *Our center is closing tomorrow and re-opening as a pandemic emergency child care center. Can we still claim meals served?*

Yes, centers that remain open to provide emergency child care can continue to serve meals. Centers can choose to continue CACFP meal service (if already participating in that program) or switch over to SFSP, if approved as an SFSP sponsor or operating under another SFSP sponsor.

The Families First Coronavirus Act gave USDA the authority to waive administrative requirements that create barriers to access, such as the area eligibility requirement for SFSP and CACFP and to reduce record-keeping requirements in CACFP. These may be helpful for centers that open to provide emergency child care. *Until USDA issues these waivers nationwide, state agencies can continue to apply for them as state waivers, and advocates, schools, program operators, and sponsors should encourage their states to apply for them if they have not already.*

CACFP

8. *If you are a CACFP sponsor, can you begin offering meals as “grab and go”?*

Yes. USDA has issued a nationwide waiver to allow meals to be provided outside of a congregate feeding setting. This includes CACFP as of March 20, 2020. *Interested sponsors should check with their state agency before changing service.*

9. ***Can at-risk afterschool meal programs provide non-congregate meals to children that were not participating or enrolled in an afterschool program previously? Do we need to collect attendance sheets/names of children receiving meals?***

Yes, programs can serve CACFP At-Risk meals to any child in the eligible area (i.e., operating as a “drop-in” or open afterschool site). USDA has issued three nationwide waivers that include CACFP, including non-congregate feeding, meal service time flexibility, and waiving the afterschool activity component. *All other CACFP regulations and proper documentation must be maintained.* See question #7 for opportunities to reduce administrative burdens.

10. ***Do you need approval from the state agency to continue with CACFP? Can out-of-school time programs that provided snacks before COVID-19 still provide snacks without programming during the crisis?***

CACFP sponsors that were operating before the COVID-19 outbreak may continue to operate. Those CACFP sites that would like to provide meals in a non-congregate setting should confirm with their state agency that they are electing to use the nationwide waiver. The activity requirement for a program serving snacks and meals through NSLP and CACFP At-Risk [has been waived](#).

11. ***Our state agency in NJ is still waiting on USDA-FNS to issue further guidance before they can waive the non-congregate requirement for CACFP.***

USDA has included CACFP in its non-congregate policy memo found [here](#). This waiver is effective immediately and applies automatically to all States that elect to use it, without further application. State agencies must inform their Regional Office if they elect to be subject to the waiver. State agencies should inform local Program operators of the flexibilities provided by this waiver as quickly as possible, and work in partnership with local operators to provide meals to all participants in a safe and accessible manner.

SFSP

12. ***Can adults 19 and older with disabilities that are enrolled in an educational program receive meals through SFSP in this situation?***

Yes, existing SFSP eligibility still applies. A person 19 years of age and older who has a mental or physical disability (as determined by a State or local educational agency) and who participates during the school year in a public or private nonprofit school program (established for the mentally or physically disabled) is also eligible to receive meals.

13. ***If a Head Start program is moving to become an SFSP closed enrolled site, do they need to organize activities for the group or is that requirement waived?***

No. SFSP/Seamless Summer Option (SSO) meal sites do not need to provide activities; and it is being actively discouraged in order to maintain social distancing. The activity requirement for a program serving snacks and meals through NSLP and CACFP At-Risk [has been waived](#).

14. ***If we were approved to provide “grab and go” meals via SFSP, do we follow the meal pattern requirements for SFSP or can we use CACFP?***

Sponsors approved to operate through SFSP should follow all SFSP regulations and meal pattern requirements.

Pandemic EBT (P-EBT)

15. *How will P-EBT get out to families? Do families need to apply on behalf of their eligible children?*

For a state to provide P-EBT benefits to households, the state's SNAP and Child Nutrition Agency must submit a joint plan to USDA that describes how they will operate P-EBT. The plan must address how the state will provide P-EBT benefits to families who participate in the Supplemental Nutrition Assistance Program (SNAP) and to those who do not participate in SNAP. Developing a process that relies on technology, and limits the need for interaction by families with SNAP offices will be critical to ensuring that eligible families receive a P-EBT card, and that SNAP offices are not overwhelmed.

States also should create a comprehensive communications strategy to inform eligible families and the general public about the purpose of P-EBT and how the benefits can be used. Learn more [here](#).

Waivers

16. *Are the waivers only available to schools, or can non-school sponsors also use the flexibilities?*

[USDA's guidance](#) specifies that both school and nonprofit sponsors may operate during school closures, and issued nationwide waivers that are available to all states. *However, sponsors should check with their state agency before beginning or changing any meal service to prevent duplicative meal services.*

17. *When are waivers valid until?*

Waivers are valid until June 30, 2020, or upon expiration of the federally declared public health emergency, whichever is earlier. The U.S. Department of Health & Human Services (HHS) determines whether the public health emergency declaration has been lifted.

18. *Do state agencies need to elect to use nationwide waivers before schools and community sponsors can implement them into our operations?*

Yes. In order for a state to use a nationwide waiver, the state child nutrition agency must notify their USDA Regional Office that it elects to use the waiver. The guidance directs state agencies to inform local program operators of the flexibilities provided by these waivers as quickly as possible and to work in partnership with schools, local government agencies, private nonprofit organizations, and other entities that operate the child nutrition programs to provide accessible meals to all participants safely.

19. *Would an organization, such as a Boys & Girls Club, fall under the additional nationwide waivers?*

Yes. If your state agency elects to use the nationwide waiver, all sponsors would be eligible to use the waiver flexibility unless otherwise specified by the state.

20. *It looks like each state is identical right now on [USDA's State COVID-19 Waiver website](#). If it says "national waiver" does that mean the state has elected to use USDA's nationwide waivers?*

No. That reflects the nationwide waiver is available to all states. Check in with your state agency to see whether they have elected to use all nationwide waivers.

SFSP and/or CACFP

21. Are schools able to serve breakfast and lunch under SFSP and also serve a snack and supper through the Afterschool Meal Program to the same child at the same time?

Per USDA, sponsors may operate both SFSP/SSO and CACFP At-Risk at the same time during unanticipated school closures. The two programs have to be serving different meals and not exceed the number of meals and snacks allowed per child, per day, per program.

For SFSP or SSO, this means up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. For CACFP At-Risk, this includes a supper and snack; however, with state agency approval, afterschool centers that normally offer a snack and supper after school may instead choose to offer either lunch and a snack, or breakfast and a snack. *At this time, USDA has not issued guidance allowing CACFP sponsors to provide meals for multiple days.*

22. Can two different organizations, one operating SFSP and the other CACFP At-Risk, serve all of the allowable meals for the day at one site at the same time?

Yes. Sponsors can work together to provide three meals a day at one site through SFSP/SSO and the CACFP At-Risk Program. For example, a school district may be able to provide breakfast and lunch, and a community sponsor would provide a supper and snack through CACFP.

23. Should At-Risk sponsors use CACFP or SFSP? We are approved for SFSP currently because non-congregate through CACFP At-Risk was not an option as of recently.

Sponsors can choose the program with which they are most comfortable; however, since SFSP allows reimbursement for two meals and CACFP at-risk only provides reimbursement for a snack and a supper, serving through SFSP may be the better option. SFSP also offers more flexibility, and if school is canceled for the remainder of the year, it will ensure that there is minimal disruption in meal service.