

Comparison of Usual Child Nutrition Program Provisions vs. Current Flexibilities Permitted in Response the Coronavirus



For the nationwide waivers referenced below, please follow the link to see the waiver language or review our [nationwide waiver summary chart](#). These waivers do **not** all apply to all operators automatically. Contact your state agency for more information. This was last updated 3/31/2020.

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
USDA	Waiver Authority	<ul style="list-style-type: none"> Cannot issue nationwide waivers Cannot approve waiver requests that increase federal costs Cannot approve waiver requests related to the meal pattern / nutritional quality 	<ul style="list-style-type: none"> May issue nationwide waivers May issue waivers that increase federal costs May issue waivers from the meal pattern requirements if related to supply chain issues caused by COVID-19
SFSP / SSO	Congregate (Group) Meal Service	Congregate meal service required (children must be served & eat on site in a supervised setting)	<ul style="list-style-type: none"> Nationwide waiver from congregate requirement under COVID-19 #2 <ul style="list-style-type: none"> All states “opted in” by virtue of individually requested and approved waivers Parent may pick up meal on child’s behalf with verification of eligible child under COVID-19 #5
	Meals Reimbursed	<p>Per child per day, up to:</p> <ul style="list-style-type: none"> Breakfast + lunch/supper OR Any one meal + snack <p>*Different for camps and migrant sites</p>	<p>SAME</p> <p>Per child per day, up to:</p> <ul style="list-style-type: none"> Breakfast + lunch/supper OR Any one meal + snack <p><i>Sites permitted to serve meals for multiple days at the same time must still comply with daily limits.</i></p>
	Meal Times	<ul style="list-style-type: none"> Service times must be established for each meal Only one meal may be served during each service time SFSP: except where waivers are granted, three hours must elapse between the beginning of one meal service, including snacks, and the beginning of another meal service, except that four hours must elapse between lunch and supper if no snack is served. SSO: breakfast must be served in the morning; lunch must be served 10am-2pm; supper service must begin before 7pm and end by 8pm; snacks must be adequately spaced between meals 	<ul style="list-style-type: none"> Under COVID-19 #1, any federal meal time restrictions have been waived, allowing states to approve more than one meal being served at a time With approval sites may distribute meals for multiple days at one time Meal distribution or delivery times must still be established

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
SFSP / SSO	Site Eligibility	<ul style="list-style-type: none"> Sites must meet applicable health & safety standards Open sites: located in eligible areas with ≥50% free/reduced-price eligible based on school or census data Closed enrolled sites: except where waivers are granted, ≥50% of enrolled participants must be documented as free/reduced-price eligible <p>*Different for camps and migrant sites</p>	<p>SAME</p> <ul style="list-style-type: none"> Sites must meet applicable health & safety standards Open sites: located in areas with ≥50% free/reduced-price eligible based on school or census data Closed enrolled sites: ≥50% of enrolled participants must be documented as free/reduced-price eligible <ul style="list-style-type: none"> SFAs must get approval for plan to target free or reduced-price eligible students at schools that are not area-eligible <i>Note:</i> several states have obtained waivers from the area eligibility requirement for open sites
	Participant Eligibility	<ul style="list-style-type: none"> Free meals for all children & teens ages 18 and under at open or closed enrolled sites <ul style="list-style-type: none"> Open sites operate on a drop-in basis Closed enrolled sites require advance enrollment <p>*Different for camps</p>	<p>SAME</p> <ul style="list-style-type: none"> Free meals for all children & teens ages 18 and under at open or closed enrolled sites <ul style="list-style-type: none"> Parent may pick up meal on child's behalf with verification of eligible child under COVID-19 #5
	Meal Requirements	<ul style="list-style-type: none"> SFSP: see the meal pattern SSO: same as NSLP Offer Versus Serve (OVS): Except where waivers are granted, OVS is permitted only for school food authority sponsors 	<p>SAME</p> <ul style="list-style-type: none"> Under COVID-19 #4, waivers may be given on a case-by-case basis if operators cannot source items needed to meet requirements. All meals should be unitized; no OVS.
	Procurement	Operators must comply with applicable procurement standards and procedures for the size of the purchase or contract.	As reiterated in COVID-19 #4 , Federal procurement regulations allow procurement by noncompetitive proposals when there is a public emergency
	Site Monitoring	Except where waivers are granted, SFSP sponsors are required to conduct a pre-operational site visit, a first week site visit, and a review of the site's food service within the first four weeks of the site's operations	Under COVID-19 #10 , sponsors are not required to conduct on-site visits or reviews but should conduct desk audits to ensure integrity. Site visits may be postponed until summer 2020 if they will operate then.

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
SFSP / SSO	Unanticipated Closures	<ul style="list-style-type: none"> Available with above provisions Sponsor must be approved within current or past two calendar years for state to waive application States may opt not to conduct pre-operational visits to sponsors operating during closures States need a waiver for schools to be sites 	<p>SAME</p> <ul style="list-style-type: none"> Available with above provisions Sponsor must be approved within current or past two calendar years for state to waive the application States may decide not to conduct pre-operational visits to sponsors operating during closures States need a waiver for schools to be sites
CACFP At-Risk	Congregate (Group) Meal Service	<ul style="list-style-type: none"> Congregate meal service required (children must be served & eat on site in a supervised setting) 	<ul style="list-style-type: none"> Nationwide waiver from congregate requirement under COVID-19 #2
	Enrichment Activities	<ul style="list-style-type: none"> Regularly scheduled, structured, and supervised educational or enrichment activities must be <i>available</i> to all (<i>participation is not required</i>) 	<ul style="list-style-type: none"> Nationwide waiver from enrichment requirement under COVID-19 #3
	Meals Reimbursed	<ul style="list-style-type: none"> Per child per day, up to any one meal and/or one snack 	<p>SAME</p> <ul style="list-style-type: none"> Per child per day, up to any one meal (breakfast, lunch, or supper) and/or one snack <i>Note: if also serving through SFSP/SSO, different meals must be served through each program</i>
	Meal Times	<ul style="list-style-type: none"> Service times must be established for each meal Only one meal may be served during each service time Meals must be served during the program's usual operating hours On school days, meals must be served after the regular school day ends 	<p>Under COVID-19 #1, any federal meal time restrictions have been waived, allowing states to approve of more than one meal being served at a time (<i>but not meals for more than one day at a time</i>)</p>
	Site Eligibility	<ul style="list-style-type: none"> All sites must meet applicable health & safety standards Located in eligible areas with ≥50% free/ reduced-price eligible based on school data only 	<p>SAME</p> <ul style="list-style-type: none"> All sites must meet applicable health & safety standards Located in eligible areas with ≥50% free/ reduced-price eligible based on school data only

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
CACFP At-Risk	Participant Eligibility	<ul style="list-style-type: none"> Free meals for all children and teens ages 18 and under Programs may be drop-in (open) or enrolled Programs may charge a fee for activities or care but not meals 	<p>SAME</p> <ul style="list-style-type: none"> Free meals for all children and teens ages 18 and under Programs may operate as drop-in (open) sites or continue as enrolled sites
	Meal Requirements	<ul style="list-style-type: none"> See CACFP meal pattern requirements 	<p>SAME</p> <p>Under COVID-19 #4, waivers may be given on a case-by-case basis if operators cannot source items needed to meet requirements</p>
	Procurement	Operators must comply with applicable procurement standards and procedures for the size of the purchase or contract.	As reiterated in COVID-19 #4 , Federal procurement regulations allow procurement by noncompetitive proposals when there is a public emergency
	Site Monitoring	<p>CACFP sponsors are required to conduct:</p> <ul style="list-style-type: none"> Pre-operational sites visits Three reviews per site per year, of which: <ul style="list-style-type: none"> No more than six months elapses in between Two must be unannounced One of the two must include an observation of the site's meal service 	<p>Under COVID-19 #7:</p> <ul style="list-style-type: none"> Pre-operational sites visits may done as desk audits Only two reviews must be done per site this fiscal year, only one of which must be unannounced The requirement that no more than six months elapses between them is waived The requirement that one unannounced review includes the observation of a meal service is waived
Unanticipated Closures	<ul style="list-style-type: none"> Available with above provisions Must be a current sponsor 	<p>SAME</p> <ul style="list-style-type: none"> Available with above provisions Must be a current sponsor 	