



This document includes questions and answers from the webinar titled **Back-to-School Meal Service: Feeding Kids During the 2020-2021 School Year – Part 1** hosted on August 10, 2020.

These questions were answered by speakers (No Kid Hungry staff) during the webinar. *Please note this document only captures those questions that were asked and answered within the Q&A box.*

The webinar slide deck and recording are available [here](#).

Please note that answers are relevant as of August 10, 2020. Certain answers may be subject to change pending revised guidance from USDA.

Commonly used acronym key:

- CACFP = Child and Adult Care Food Program
- NSLP = National School Lunch Program
- SBP = School Breakfast Program
- SSO = Seamless Summer Option
- SFSP = Summer Food Service Program

Question: When we say "CACFP" does that include "CACFP At-Risk"?

Correct, that includes CACFP At-Risk. It's important to note that, while the four waivers extended through June 30, 2021 apply to all CACFP sub-program components, the enrichment requirement is still in effect for the At-Risk Afterschool component. (It's also still in effect for afterschool snacks through NSLP.) To operate CACFP At-Risk and/or NSLP afterschool snacks during this school year, at this time, you must provide a "structured and supervised educational or enrichment activity." This may include virtual activities. Check with your state agency for guidelines on what meets the requirement.

Question: What are waivers?

Waivers are an official exemption from a usual program rule. Usually, the law and regulations restrict the USDA to offering waivers in fairly limited circumstances, and waivers usually can only be given in response to a request from a state, or from a state on behalf of a program operator. However, the Families First Coronavirus Response Act gave USDA broader authority to issue waivers from program rules in order to allow for safe service during the pandemic. This No Kid Hungry resource summarizes the nationwide waivers issued to date by USDA in response to the coronavirus:

<http://bestpractices.nokidhungry.org/resource/summary-current-covid-19-child-nutrition-program-response-nationwide-waivers>

Question: Massachusetts is set to reopen on 9/16—Those schools could use SSO but not SFSP to bridge the gap between 8/31 waiver expiration and 9/16 school start, right? SFSP could be used but no waivers.

Correct, that is our understanding at this time—critical SFSP waivers like the congregate waiver are set to expire 8/31, but NSLP/SBP can't operate until school starts. SSO may be an option because the NSLP waivers apply to SSO, and [SSO may operate through September](#) when school is not in session.

Question: Does that mean if we plan to open up but end up getting shut down due to COVID outbreak in school, would that be considered unanticipated closure and then we could do SSO?

We think so, starting October 1st, at least. Unanticipated school closure options for SFSP/SSO are typically only allowed October-April. Check with your state agency now so that you can be prepared should unanticipated closures occur.

Question: Is there a waiver that allows mobile meal delivery under NSLP?

Yes, the non-congregate waiver combined with the meal service time waiver allows for mobile meal delivery under NSLP. Your operations plan must be approved by your state agency.

Question: For Illinois, I believe ISBE is allowing parents to pick up meals on behalf of students for NSLP and CACFP— is that not the case?

The parent/guardian meal pick-up waiver is a nationwide waiver that was extended through June 2021 for NSLP, SBP and CACFP.

Question: If school is operating even at 50% online, with social distancing...how can at-risk/CACFP offer an enrichment component. If there is non-congregate waiver, does this not apply to CACFP?

The congregate waiver was extended for CACFP & NSLP but not the enrichment waiver for CACFP At-Risk or NSLP Snacks. It's possible that these waivers were intended to support school lunch (in the case of the NSLP waivers) and child care operators (in the case of CACFP), not afterschool programs. It's also possible that afterschool programs may be approved to provide non-congregate meals if they offer virtual activities.

Question: If we have an unanticipated closure due to the virus, do we need a waiver to jump into pick up or delivery for lunch or breakfast so kids get fed for the days school would be closed?

- 1) If schools switch to virtual learning (rather than closing altogether), you could do pick up or delivery through NSLP/SBP, as long as you can meet all of the usual requirements.
- 2) Unanticipated school closure options may be available for SSO starting October 1st since the non-congregate, service time and parent pick-up waivers already apply to SSO.
- 3) You would need more waivers to be extended for SFSP in order to operate SFSP during unanticipated closures. Unanticipated closure operations with SFSP are also restricted to October through April.

Question: Our state agency told us that afterschool programs that plan to offer full-day care for children of essential workers have to be licensed if they're operating for more than four hours/day. Is that true? Is anyone else running into that?

Always check with your state to ensure that sites are complying with any necessary child care licensing laws. This is expected for all CACFP sub-program components, including Outside-School-Hours-Care and At-Risk Afterschool. Licensing rules vary by state, county, and city, so we can't tell you what they are in your area. It is possible that a normally license-exempt afterschool program may become subject to licensing laws if they start caring for younger children, start operating for longer hours, or make other changes in their operations. On the other hand, some states waived certain licensing requirements for providers offering care for children of essential workers during state emergency declarations.

Question: Could a school offering in-person instruction Monday through Friday send home breakfast for Monday morning when students leave on Friday?

Presumably, yes, the current congregate and meal service time waivers would allow for that. You would likely not be able to serve breakfast on Monday morning in addition to Friday afternoon, though. *For this and all operations and claiming questions, please confer with your state agency.*

Question: Would any of this funding be available to a city sponsor of SFSP and CACFP? At a glance, it seems like the Coronavirus Relief fund would be our best bet.

The Coronavirus Relief Fund will certainly be the best option since the others are solely school-based. Cities with more than 500,000 people received CRF directly from federal government and smaller cities will likely receive funds through the state.

Question: Were there any USDA programs funded in the CARES Act specifically for school meals programming (as an exclusive or an allowable use)?

The child nutrition programs received \$8.8 billion through the CARES Act. To the best of our knowledge, the USDA has said that money is necessary for standard meal reimbursements under the current waivers and program options.

Question: How do you apply for FEMA grant? Can a Food Service Department apply on their own or must it be a district application?

The entity would most likely be the district. I would recommend reaching out to your state's emergency management agency or your FEMA district office to start the conversation about eligibility: <https://www.fema.gov/about/contact>

Question: Does CEP apply to nonprofits during the application process for CACFP?

CEP is an option for schools and districts, which applies to breakfast and lunch.

Question: How does CEP interact with waivers? Can you deliver meals to children in a CEP school without tracking individual eligibility?

Yes and no, in some respects. USDA guidance says that you have to confirm deliveries with the family in advance, and presumably deliveries would be tracked by name to ensure accuracy. However, meals delivered to students enrolled in a CEP school would all be claimed in the same manner. The biggest benefit is not having to collect any money since everyone qualifies for free meals at CEP schools.

Question: If a district is partial CEP – some CEP schools, some non-CEP schools – can students enrolled in a non-CEP school pick up free meals at a CEP school?

No, if a district is partially implementing CEP, only students attending CEP schools, and students otherwise certified for free school meals, can get a free meal at CEP schools. If you are serving grab and go meals to distance learners at CEP schools, your state agency will likely require that you verify each student's enrollment in a CEP school. This may require tracking each individual student picking up a meal, as well, to prevent serving more than one meal per student per meal service. Hopefully when things get back to normal, CEP schools can return to more streamlined counting and claiming procedures!