

FAQs on Child Nutrition Program Operations During Summer 2020

This FAQ addresses SFSP and SSO unless other programs are explicitly discussed.

This is based on guidance and options available as of 8/27/2020. For a complete list of nationwide waivers and memos, consult our [summary of nationwide waivers and guidance](#).

Please defer to the [US Department of Agriculture's guidance](#) and your state agency.

To quickly find what you need, please click on a question to be directed to its answer.

Program Options and General Requirements

1. [Which child nutrition programs are available to feed kids during summer 2020?](#)
2. [The start of the school year was delayed in my district or community. Which program can I use until the school year begins?](#)
3. [The school year has started in my district or community, but it's all virtual. Can I still serve through the summer meals programs?](#)
4. [Can we serve meals through the child nutrition programs outside of the usual group \("congregate"\) settings to allow for social distancing?](#)
5. [Who can receive meals?](#)
6. [Do children have to be present to receive a meal, or can parents or guardians pick up meals on behalf of their children?](#)
7. [Do meal service time restrictions still apply? Can I provide more than one meal at a time or provide meals for multiple days at one time?](#)
8. [Can meals be served on weekends?](#)

Sponsors, Sites, Distribution, and Home Delivery

9. [Who exactly can operate child nutrition programs this summer?](#)
10. [Could private and charter schools operate SFSP or SSO and take advantage of waiver flexibilities?](#)
11. [Can new organizations be approved to operate SFSP or SSO and utilize these flexibilities?](#)
12. [Can new sites or meal distribution points be approved?](#)
13. [Do area eligibility restrictions still apply to SFSP and SSO open sites?](#)
14. [What if a site does not qualify as area eligible, even under our state's waiver?](#)
15. [Can we serve an identified group of children as a closed enrolled site? How can we qualify?](#)
16. [Can a site participate in both CACFP and SFSP or SSO at the same time?](#)
17. [What options are available for non-congregate meal service?](#)

18. My state or area is under a “shelter in place” or “stay at home” order that limits all but essential services. [Can we still prepare and distribute meals? Can families still come to pick them up at distribution points, or do they have to be delivered to homes?](#)

Monitoring and Visits

19. [Are first week site visits still required?](#)
20. [As a sponsoring organization or school food authority, do we need to continue to do on-site monitoring and reviews?](#)

Menus and Meal Options

21. [Which meals can be served through SFSP and SSO? Are there limits on meals per child?](#)
22. [What are my options for packaging or serving meals? Can I do Offer Versus Serve?](#)
23. [Is there any flexibility on the meal pattern requirements, especially with issues related to supply and availability?](#)
24. [Is there any flexibility on procurement requirements to help us source food from other vendors that may have what we need?](#)

Waiver Requests

25. [What other program requirements will continue to apply?](#)
26. [Can states submit waivers for other requirements?](#)
27. [Should states wait for the USDA to make blanket national waivers?](#)
28. [Can schools or sponsoring organizations take action to request or implement waivers on their own?](#)
29. [Will schools or sponsoring organizations eventually have to submit waiver requests to their states?](#)

Pandemic EBT

30. [What is Pandemic-EBT authorized by the Families First Coronavirus Response Act \(H.R 6201\)?](#)
31. [If my state implements P-EBT, will my school or sponsoring organization still be able to serve non-congregate meals?](#)
32. [Does P-EBT cover the summer?](#)
33. [Is P-EBT available to children who are affected by child care closures?](#)

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Program Options and General Requirements

1. Which child nutrition programs are available to feed kids during summer 2020?

- The **Summer Food Service Program (SFSP)**,
- The NSLP **Seamless Summer Option (SSO)**, and
- The **Child and Adult Care Food Program (CACFP)** child care center, family day care home, adult care, and emergency shelter components.
 - The CACFP At-Risk Afterschool Meals component is typically only available during the regular school year and must end by the last day of school.
 - The USDA memo "[Questions and Answers on the Nationwide Waiver to Extend Unanticipated School Closure Operations through June 30, 2020](#)" clarified that [COVID-19 Child Nutrition Response #21](#) allowed CACFP At-Risk Afterschool Meals to operate until June 30, 2020, regardless of the school calendar.
 - Per usual regulations, the CACFP At-Risk Afterschool Meals component may continue to operate during the summer months in areas with a year-round school calendar. However, the [afterschool enrichment activity requirement waiver](#) also expired June 30, 2020.
- The **National School Lunch Program (NSLP)** and **School Breakfast Program (SBP)** could continue to operate in year-round schools as well as for students enrolled in summer school.
- The rest of this Q&A will address SFSP and SSO unless CACFP or other programs are explicitly discussed.

2. The start of the school year was delayed in my district or community. Which program can I use until the school year begins?

- Approved sponsors can continue to operate the SFSP or SSO until the start of the school year, even if the summer was originally scheduled to end earlier.
 - However, waiver flexibilities for the SFSP currently expire on September 30, 2020, so SFSP would not be a feasible option after that, even if the start of the school year were delayed until October.
- Work with your state agency to confirm ongoing approval and update site applications as needed.

3. The school year has started in my district or community, but it's all virtual. Can I still serve through the summer meals programs?

- No, once the school year begins, whether virtually, in person, or a hybrid, the summer meals programs become unavailable to both school and non-profit sponsors.

- Schools must transition to the NSLP and SBP once the school year begins in any form
- Non-profit sponsors must transition to the CACFP At-Risk Afterschool Meals program, if eligible and approved.

4. Can we serve meals through the SFSP, SSO, and CACFP outside of the usual group (“congregate”) settings to allow for social distancing?

- **Yes.** The COVID-19 Child Nutrition Response Act, part of the broader Families First Coronavirus Response Act ([H.R. 6201](#)), gave USDA broad authority to issue waivers from usual program requirements.
- [COVID-19: Child Nutrition Response #22](#) extended the nationwide waiver from the congregate meal requirement in the **SFSP** through **September 30, 2020**.
- [COVID-19: Child Nutrition Response #33](#) extended the nationwide waiver from the congregate meal requirement in the **CACFP**, **NSLP** (including **SSO**), and **SBP** through **June 30, 2021**.
- These waivers are available to states without requiring an application or approval of a request to the USDA; states must merely inform their USDA Regional Office that they choose to be subject to the waiver and must submit a report on its use one year after receipt.

Social distancing is a method of preventing the spread of a contagious disease by limiting the physical proximity and probability of contact between people.

Requiring groups of children to eat together defeats the purpose of school and child care closures intended to stop the community spread of the coronavirus that causes COVID-19.

5. Who can receive meals?

- SFSP and SSO open sites may serve meals to **all** children and teens ages 18 and under, as well as persons with disabilities of any age who participate in school programs for people with physical or mental disabilities.
- SFSP or SSO closed enrolled or camp sites are limited to serving their enrolled participants.
- See Questions [#13](#), [#14](#), and [#15](#) for more information about area eligibility, open sites and closed enrolled sites.
- Please refer to the USDA’s [SFSP Administration Guide](#) for more information on camps, migrant sites, and other site types along with their eligibility guidelines.

6. Do children have to be present to receive a meal, or can a parent or guardian pick up meals on behalf of their children?

- No, a child does not have to be physically present. [COVID-19: Child Nutrition Response #47](#) allows a parent or guardian to pick up meals on behalf of their eligible child(ren) through September 30, 2020. This applies to all child nutrition programs.

- Additionally, the USDA guidance on [home delivery through SFSP or SSO](#) addresses this question, as does Question #13 on home delivery through CACFP in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3](#). See [Question #17](#) for more information on home delivery.
- States and program operators must still have a plan in place to maintain accountability and integrity, namely verifying that the adult has an eligible child and that duplicate meals are not distributed to any child.
 - The USDA encourages states to work collaboratively with program operators to determine the best method for verification.
 - This [USDA Team Nutrition resource](#) has established best practices for distributing meals to parents or guardians.

7. Do meal service time restrictions still apply? Can I provide more than one meal at a time? What about meals for multiple days at the same time?

- The USDA issued a nationwide waiver of meal service time requirements and, through [COVID-19: Child Nutrition Response #17](#), extended it through **September 30, 2020** for SFSP and SSO.
- As confirmed by guidance memos, this waiver creates the flexibility needed to distribute meals at the time that works best as well as to distribute multiple meals for the same day and meals for more than one day, up to one week at a time.
 - See Question #16 in [Child Nutrition Program Nationwide Waivers: Questions and Answers](#) and the USDA's [Q&A on home delivery in the SFSP](#).
- The daily limits on the number of meals per child still apply. See [Question #19](#) for more information.
- Program operators must still establish a schedule for meal distribution or delivery.

8. Can meals be served on or for weekends?

- Yes, meals may be served seven days per week through the SFSP and SSO.
 - Check with your state agency before serving meals on or for weekends to confirm approval.
- The limit on meals per child per day still apply. See [Question #21](#) for more information.

Sponsors, Sites, Meal Distribution, and Home Delivery

9. Who exactly can operate child nutrition programs this summer?

- School food authorities may operate either SFSP or SSO.
- Eligible public and private non-profit organizations may operate the SFSP.
- For the CACFP, public or private non-profit organizations, including school food authorities, as well as eligible for-profit care providers may be approved to operate.

10. Could private and charter schools operate SFSP or SSO and take advantage of waiver flexibilities?

- Yes, private and charter schools are generally eligible to operate either the SFSP or SSO. If approved to operate, they can take advantage of any waiver flexibilities that their state has elected to use.
- Children who attend private or charter schools can receive meals at any open site operated by another organization, so coordination with other program operators is recommended to minimize duplication of services and maximize access.

11. Can new organizations be approved to operate child nutrition programs and utilize these flexibilities?

- The USDA has waived the federal application deadline for SFSP and SSO, but check with your state agency regarding application requirements.
- The deadline for new sponsoring organizations may have passed, or they may require an application a certain number of weeks prior to beginning operations.

12. Can new sites or meal distribution points be approved?

- Yes, sponsors can seek approval for new sites. New mobile routes and meal distribution points, other than direct home delivery, would require approval like any new site.
 - See [Question #17](#) for more on direct home delivery.
- Sites must meet all requirements (unless specifically waived), and sponsors must complete all required aspects of the application and approval process.
- SFSP sponsors are required to visit each new site within its first week of operations. Under [COVID-19: Child Nutrition Response #30](#), this visit and assessment of the site's operations may occur off-site.
- Regarding approval of new CACFP sites, [COVID-19: Child Nutrition Response #39](#) allows sponsors to conduct all monitoring activities off-site through September 30, 2021. See Questions #5 & #6 in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #4](#) for more on how this applies to pre-approval visits and first reviews.

13. Do area eligibility restrictions still apply to SFSP and SSO open sites?

- With [COVID-19: Child Nutrition Response #46](#), the USDA offered a nationwide extension of all state-requested waivers of the area eligibility requirement for open sites in the SFSP and SSO through September 30, 2020.
- The usual requirement for open-to-all SFSP and SSO sites is that they are located in "areas in which poor economic conditions exist." This has been interpreted as areas in which at least half of students or children are eligible for free or reduced-price school meals.

- You can use the [No Kid Hungry Averaged Area Eligibility Map](#) to determine whether a location is area eligible for SFSP or SSO under usual requirements. This is based on USDA guidance on the use of census data.
- States may differ in how their waiver was written and applied; some have lowered the area eligibility threshold while others request data from other sources than schools or the census in order to show that poor economic conditions exist.
 - Work with your state agency to determine whether a potential site is eligible to be an open site.

14. What if a site does not qualify as area eligible, even under our state’s waiver?

- Sites that do not qualify as area eligible may seek approval as closed enrolled sites.
- Closed enrolled sites in areas that do not meet the 50 percent threshold must collect income eligibility applications from an identified group of children who will be served by the site. At least half of those children must qualify for free or reduced-price meals.
- Once a site qualifies as closed enrolled, meals may be served free of charge to all of the identified children enrolled at the site, regardless of their individual eligibility status.

15. Can we serve an identified group of children as a closed enrolled site? How can we qualify?

- Yes, sponsors can still operate closed enrolled sites to serve an identified group of children.
- Closed enrolled sites may qualify based on either area eligibility (through [COVID-19: Child Nutrition Response #14](#)) or the collection of income eligibility applications.

16. Can a site participate in both CACFP and SFSP or SSO at the same time?

- Yes, but only if the site serves different groups of children through each program. See Question #2 in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #4](#).
- CACFP sites, other than At-Risk Afterschool Meals sites, cannot alternate between CACFP during the school year and SFSP or SSO during the summer. However, per Question #1 in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #4](#), a CACFP site that is closed could become an SFSP site under an approved SFSP sponsor.

17. What options are available for non-congregate meal service?

- Options may include home delivery; delivery along school bus routes or mobile routes; and meal distribution at schools and other locations, including drive-thru or walk-up distribution.

- Direct delivery to children’s homes is available to school food authorities, CACFP operators that collect enrollment, and non-profit community organizations that are willing and able to publicly promote the ability to sign up for meal delivery.
 - Program operators must contact families, receive consent, and verify the address before beginning meal delivery.
 - Operators may partner with other organizations to deliver meals if the family consents to share their information.
 - For additional guidance regarding home delivery through SFSP or SSO, see:
 - The [Q&A on meal delivery through SFSP and SSO](#).
 - Questions #9 & #10 in the [Q&A on the waiver extending unanticipated school closure operations](#).
 - For guidance regarding home delivery through the CACFP, see Questions #9-13 in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3](#).
- Transportation and delivery costs are allowable program expenses that may be covered with meal reimbursements. There is no additional federal funding currently available to specifically offset transportation and delivery expenses.
- Regarding the ability to distribute multiple meals at one time, see [Question #5](#).
- See [Question #6](#) for information about distributing meals without a child present.
- For additional ideas and strategies on non-congregate meal service, see our resource <https://bestpractices.nokidhungry.org/resource/emerging-strategies-tactics-meal-service-during-school-closures-related-coronavirus>.

18. My state or area is under a “shelter in place” or “stay at home” order that limits all but essential services. Can we still prepare and distribute meals? Can families still come to pick them up at distribution points, or do they have to be delivered to homes?

- While distribution points offering meals through the child nutrition programs have not always been explicitly called out as exempt from these orders, it is generally accepted that they are permitted to continue operating.
- So far, all such orders have exempted grocery stores and food outlets offering food for take-out or delivery.
- Likewise, it is generally permitted for people to leave their homes in order to get food at a grocery store or food outlet offering take-out or meals to-go.
- Contact your state agency or state or local health department to confirm or seek additional clarity.

Monitoring and Site Visits

19. Are first week site visits still required?

- SFSP sponsors are required to visit each new site within its first week of operations. Under [COVID-19: Child Nutrition Response #30](#), this visit and assessment of the site's operations may occur off-site.
- [COVID-19: Child Nutrition Response #15](#) waived the first week site visit requirement for sites that successfully participated in the SFSP last summer and sponsors that successfully participate in the NSLP or CACFP.

20. As a sponsoring organization or school food authority, do we need to continue to do on-site monitoring and reviews?

- No. Through a [series of nationwide waivers](#), the USDA eased requirements for monitoring and reviews, particularly any in-person or on-site component, across all child nutrition programs. These apply to state agencies as well as school food authorities and sponsoring organizations.
- State agencies, school food authorities, and sponsors must still ensure integrity to the greatest extent possible with remote monitoring activities like desk audits.
- For the CACFP, sponsors are permitted to monitor their facilities two times (instead of three) this fiscal year, and only one must be unannounced. The USDA also waived the requirements for at least one unannounced review to include the observation of a meal service and for no more than six months to elapse between reviews.

Meal and Menu Options

21. Which meals can be served through SFSP and SSO? Are there limits on meals per child?

- Each open or closed enrolled site may serve up to two meals or snacks per child per day in any combination *except* lunch and supper. Allowable combinations include:
 - Breakfast and lunch (*or* supper)
 - This is the most typical combination since it maximizes both reimbursements and food provided.
 - Breakfast and snack
 - Lunch (*or* supper) and snack
- Camps and migrant sites may be approved to serve up to three meals or two meals and one snack per child per day. Please refer to the USDA's [SFSP Administration Guide](#) for more information on camps and migrant sites.
 - Note that, according to [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3](#), camps are still required to provide activities.
- Regarding the ability to distribute multiple meals at one time, see [Question #7](#).

22. What are the options for packaging or serving meals? Can we do Offer Versus Serve (OVS)?

- USDA guidance advises that meals should be unitized.
- Question #18 in [Child Nutrition Program Nationwide Waivers: Questions and Answers](#) does allow for items to be served in bulk when multiple meals are provided at the same time as long as there are instructions on portions and the items can be easily separated into meals with minimal preparation.
- [COVID-19: Child Nutrition Response #16](#) does allow SFSP sponsors to implement OVS if they can do so with appropriate safety measures. The waiver stipulates requirements for implementing OVS.

23. Is there any flexibility on the meal pattern requirements, especially with issues related to supply and availability?

- The USDA offered and extended a nationwide waiver from the meal pattern requirements across all of the child nutrition programs.
 - For the **SFSP**, this waiver ([COVID-19: Child Nutrition Response #46](#)) expires on **September 30, 2020**.
 - For the **NSLP** (including **SSO**), **SBP**, and **CACFP**, this waiver ([COVID-19: Child Nutrition Response #36](#)) expires on **June 30, 2021**.
- Unlike other nationwide COVID-19 response waivers, the USDA explicitly requires operators to receive approval from their state agency prior to implementing this. This waiver may only be granted on a case-by-case basis.
- Additionally, state agencies must inform their USDA Regional Office when and where this waiver is in effect and for what food components.
- The guidance from the USDA tells states to consider whether the request is due to supply issues and encourages them to maintain and meet the nutritional standards of meals to the greatest extent possible.
- Additionally, as noted in Question #1 in [Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3](#), states may approve operators to serve meals without milk if emergency circumstances temporarily prevent them from obtaining milk. Question #2 also notes that states can approve schools to only offer one type of milk with meals served through SSO. These do not require a waiver from the USDA.

24. Is there any flexibility on procurement requirements to help us source food from other vendors that may have what we need?

- Yes, [COVID-19: Child Nutrition Program Response #4](#) includes a reminder that Federal procurement regulations allow procurement by noncompetitive proposals when there is a public emergency.

- See [Q&As related to Food Service Management Company Contracts and Allowable Costs during the COVID-19 Pandemic](#) for more information.

Other Requirements and Waiver Requests

25. What other program requirements will continue to apply?

- At this point, unless your state agency communicates that they have received additional waivers, **all other usual requirements apply**, including but not limited to:
 - Health, sanitation, and safety requirements
 - Accommodating special dietary needs
 - Displaying the non-discrimination statement on promotional materials
 - Record keeping requirements
 - Deadlines to submit claims for reimbursement
- Work with your state agency regarding any other waivers needed.

26. For the nationwide waivers, do program operators have to submit the own waiver request to the state agency in order to use them, or can they just implement the flexibilities?

- First, confirm that your state has opted in to the waiver. You can view the status of waivers by state at <https://www.fns.usda.gov/disaster/pandemic/covid-19/cn-waivers-flexibilities>.
- Program operators generally need to communicate plans to their state agency in advance. This may be in the form of a waiver request, although the USDA has clarified that this is not required for many of the nationwide waivers. (See both [Child Nutrition Program Nationwide Waivers: Questions and Answers](#) and [Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers](#).)
 - For flexibility on the meal pattern requirements, operators will need to request and receive approval. See [Question #23](#) for more information.
- We encourage states agencies to make available flexibilities as easy and quick as possible for program operators to adopt and implement.
- School food authorities and sponsoring organizations may also need to submit or update their application information with the state agency to operate SFSP or SSO.

27. What if a state agency did not adopt one of the nationwide waivers? Can program operators take action to request or implement waivers on their own?

- If your state agency has **not** elected to be subject to one of the nationwide waivers, or if you need another waiver that your state has not requested, then you may be able to submit a waiver request on your own using the protocols outlined at <https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised>.

- Your state agency must still elevate your request to the USDA Regional Office. State agencies and regional offices are likely busy at this time.

28. Can states submit waivers for additional requirements?

- Yes, states may request waivers from other requirements as necessary and appropriate.
- To submit a waiver, see <https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised>.

29. Should states wait for the USDA to issue more nationwide waivers?

- We understand that submitting waiver requests takes additional work. However, until further guidance is provided regarding the implementation of the Families First Coronavirus Response Act ([H.R 6201](#)), we encourage all states to be proactive and submit any necessary waiver requests as soon as possible.
- Waivers that increase federal costs will only be issued on a state-by-state basis.

Pandemic EBT

30. What is Pandemic-EBT as authorized by the Families First Coronavirus Response Act ([H.R 6201](#))?

- [Pandemic-EBT](#) (Pandemic Electronic Benefit Transfer or P-EBT) is a state option to provide food assistance in the event of school closures lasting 5 or more days to all children who would have otherwise received a free or reduced-price meal at school.
 - This includes all children at schools implementing the Community Eligibility Provision (CEP).
- It provides funds for food, similar to the Supplemental Nutrition Assistance Program (SNAP), equal to the value of the meals the child would have received at school.
- For children in households that already receive SNAP benefits, the additional P-EBT benefits will be added to their existing EBT card. For children in households that do **not** already receive SNAP, state agencies will provide them with new EBT cards.
- Benefits can be issued retroactively from the date of application and/or eligibility.
- The law authorizes the information sharing necessary to implement P-EBT.
- States must [submit a P-EBT implementation plan](#) to the USDA for approval.
- See our [FAQ on P-EBT and Coronavirus Response SNAP](#) for more information.

31. If my state implements P-EBT, will my school or sponsoring organization still be able to serve non-congregate meals?

- Yes, both options could operate concurrently.

32. Does P-EBT cover the summer?

- No, as it is currently authorized, P-EBT only provides the value of school breakfast and lunch while schools were closed during the regularly scheduled school year.

- Based on when a state implements P-EBT, families may receive their benefits over the summer.

33. Is P-EBT available to children who are affected by child care closures?

- Generally, no, P-EBT is not available to children affected by the closure of their child care center or other child care provider, whether their provider operated the CACFP or not.
- Children who attended Head Start or preschool programs within schools and received free or reduced-price meals through the school may be eligible.