



### **FAQs on Child Nutrition Program Options Available During** School Closures Related to the Coronavirus

Based on available guidance and options available as of 5/7/2020. For a complete list of nationwide waivers and memoranda, please 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.

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- 1. Can we serve meals through the child nutrition programs 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 (<u>H.R</u>
    6201), gave USDA broad authority to issue
    waivers from usual program requirements.
  - In a memo dated 3/20/20, <u>COVID-19</u>: <u>Child</u>
     <u>Nutrition Response #2</u>, the USDA issued a
     nationwide waiver from the congregate
     meal requirement across all child nutrition
     programs:

**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.

- National School Lunch Program (NSLP)
- School Breakfast Program (SBP)
- Summer Food Service Program (SFSP) and NSLP Seamless Summer Option (SSO)
- Child and Adult Care Food Program (CACFP), including child care, adult care, emergency shelters, and the At-Risk Afterschool Meals component.
- This waiver is 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.
  - We strongly encourage all state agencies to do so as soon as possible and to communicate this to program operators.
- Please contact your state agency to verify that they have elected to be subject to the waiver and to begin work on implementation.

## 2. Are all of the child nutrition programs available to serve kids during unanticipated school and child care closures?

- Typically, SFSP, SSO, and the CACFP At-Risk Afterschool Meals component are available options during unanticipated school closures.
- With the <u>COVID-19: Child Nutrition Response #2</u> memo, the USDA clearly extended
  the ability to serve meals in non-congregate settings through the CACFP, including
  the child care center, family day care home, and At-Risk Afterschool components.
  - Though not typically permitted to serve meals outside of normal operating hours, Question #16 in the USDA guidance <u>Child Nutrition Program</u> <u>Nationwide Waivers: Questions and Answers</u> confirmed that CACFP operators may serve meals while closed due to COVID-19.
- At this time, it appears that NSLP and SBP may only available to schools implementing distance learning, not schools that are closed due to the coronavirus.
  - See Question #9 in the USDA's Q&A guidance on meal delivery.
  - This may still be a good option if your school does not qualify as area eligible to be an open site in the SFSP or SSO and cannot obtain a waiver from this requirement. See <u>Question #16</u> for more information on open and closed enrolled sites in the SFSP and SSO.
  - Please contact your state agency for guidance prior to utilizing NSLP or SBP during a school closure.

#### 3. Who can receive meals? Can only enrolled students or children receive meals?

 In general, SFSP and SSO open sites and CACFP At-Risk Afterschool sites may serve <u>all</u> children and teens ages 18 and under, as well as persons with disabilities of any age.

- See <u>Question #5</u> for more on CACFP At-Risk Afterschool, <u>Question #6</u> for more on area eligibility, and <u>Question #16</u> for information on SFSP open and closed enrolled sites.
- NSLP, SBP, other CACFP program components, and SFSP or SSO closed enrolled or camp sites are limited to serving their enrolled students or participants, as confirmed by Question #11 in the USDA guidance <u>Child Nutrition Program</u> Nationwide Waivers: Questions and Answers.
- 4. Do children have to be present to receive a meal, or can a parent or guardian pick up meals on behalf of their children?
  - The USDA released <u>COVID-19</u>: <u>Child Nutrition Response #5</u>, offering a nationwide waiver to clarify that children do *not* have to be physically present and that their parent or guardian may pick up meals on their behalf. Additionally, the USDA guidance on <u>home delivery through SFSP or SSO</u> addresses this, as does Question #13 on home delivery through CACFP in <u>Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks</u>: <u>Questions and Answers #3</u>.
  - 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.
    - Potential options may include showing each eligible child's birth certificate, proof of school enrollment, or documentation proving legal guardianship.
  - As with all nationwide COVID-19 response waivers, this is 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.
    - We strongly encourage all state agencies to do so as soon as possible and to communicate this to program operators.
- 5. Do we still have to offer supervised enrichment programming in order to serve meals through the CACFP At-Risk Afterschool Meals component?
  - No. Through the memo <u>COVID-19: Child Nutrition Response #3</u>, the USDA has issued a nationwide waiver of the afterschool activity requirement in both the CACFP At-Risk Afterschool Meals component and the NSLP Afterschool Snack Program. This, along with the waiver of the congregate meal requirement, will support social distancing while supplying children with needed nutrition.
  - As with all nationwide COVID-19 response waivers, this is 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.
    - We strongly encourage all state agencies to do so as soon as possible and to communicate this to program operators.

- Please contact your state agency to verify that they have elected to be subject to the waiver and to begin work on implementation.
- As a reminder, CACFP At-Risk Afterschool Meals never required enrollment. CACFP At-Risk Afterschool Meals sites may be open to all as "drop-in" locations.

## 6. Do area eligibility restrictions still apply to SFSP, SSO, CACFP At-Risk Afterschool Meals, and NSLP Area-Eligible Afterschool Snacks?

- Yes, although many states have already requested and received waivers from the area eligibility requirements for open sites in the SFSP and SSO.
  - The Families First Coronavirus Response Act (<u>H.R 6201</u>) gave USDA the authority to waive the area eligibility requirements for open sites in the SFSP and SSO in response to state requests.
  - Ask your state agency whether or not they have received this waiver, and if so, how to proceed with implementation. There may still be restrictions or additional information required before allowing new sites to become eligible as open sites.
  - If your state agency has not already requested this waiver, encourage them to apply.
- For additional information on where programs can operate, see Question #16.

## 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?

- USDA issued a nationwide waiver of meal service time requirements. The memo <u>COVID-19: Child Nutrition Response #1</u> creates the flexibility needed to distribute multiple meals for the same day at one time.
- The USDA has confirmed that SFSP, SSO, and CACFP operators may provide meals for multiple days at the same time, up to one week at a time. See Question #16 in <u>Child Nutrition Program Nationwide Waivers: Questions and Answers</u> 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 #22 for more information.
- Program operators must still establish a schedule for meal distribution or delivery.
- As with the other waivers, this is 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.
  - We strongly encourage all state agencies to do so as soon as possible and to communicate this to program operators.
- Please contact your state agency to verify that they have elected to be subject to the waiver and to begin work on implementation.

### 8. Can states submit waivers for additional requirements?

- Yes, states may request waivers from other requirements as necessary and appropriate. This may include waivers from the area eligibility requirement in SFSP, SSO and CACFP At-Risk Afterschool, minimum free or reduced-price eligibility levels in for-profit child care centers, or deadlines for appeals or other reporting.
- If your agency has not already requested waivers affected by the <u>2018 memoranda</u> <u>rescission</u>, consider applying now in the event that nationwide COVID-19 waivers are not extended throughout the summer, especially waivers granting flexibilities around first week site visits, meal service time restrictions, and extended area eligibility for closed enrolled sites.
- To submit a waiver, see <a href="https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised">https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised</a>.
- You can view the status of waivers by state at <a href="https://www.fns.usda.gov/disaster/pandemic/covid-19/cn-waivers-flexibilities">https://www.fns.usda.gov/disaster/pandemic/covid-19/cn-waivers-flexibilities</a>.

#### 9. 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 (<u>H.R 6201</u>), 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.
  - As a result, our understanding is that the area eligibility requirement for open sites in SFSP and SSO may only be waived upon a state's request.

### 10. Can program operators take action to request or implement waivers on their own?

- Program operators should **not** implement any of the flexibilities available through nationwide waivers without first confirming that their state agency has elected to be subject to the waiver.
  - The only potential exceptions are the <u>waivers related to on-site monitoring</u> and the <u>revised deadline for January and February claims</u> for reimbursement.
     It is always safest to confirm with your state agency.
- 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 <a href="https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised">https://www.fns.usda.gov/cn/child-nutrition-program-waiver-request-guidance-and-protocol-revised</a>.
  - Your state agency must still elevate your request to the USDA Regional Office. State agencies and regional offices are likely busy at this time.
- Program operators should begin working in coordination on plans for responding to school and care provider closures and proactively communicating with their state

agency regarding waiver status, procedures, challenges meeting meal pattern requirements, and any issues encountered that may require additional waivers.

### 11. Will program operators eventually have to submit waiver requests to their states?

- 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 <u>Child Nutrition Program Nationwide Waivers: Questions and Answers</u> and <u>Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers.)</u>
  - For flexibility on the meal pattern requirements, operators will need to request and receive approval. See Question #19 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.

## 12. Who exactly can operate child nutrition programs during school and care closures due the coronavirus?

 All child nutrition program operators in good standing, which include school food authorities, eligible public and private non-profit organizations, and eligible for-profit care providers, may be approved to operate during school and care closures.

## 13. Does this apply to charter or private school closures, and could private and charter schools operate the child nutrition programs?

- Yes, this would apply to charter and private school closures, but proactive
  communication with the state agency is recommended to ensure eligibility, target the
  students affected by the closure, and coordinate convenient access for students who
  may not live near the school.
- If public schools in the same area have shut down and are publicly promoting the
  availability of meals at certain schools, or if non-profit organizations are providing
  meals in the community, private and charter school students should be able to
  receive meals at those locations.

# 14. Can new school food authorities or sponsoring organizations be approved to operate child nutrition programs and utilize these flexibilities?

 Current program operators are generally best positioned to utilize these flexibilities to serve children during school and child care closures caused by the coronavirus, with some exceptions:

### o SFSP

 School food authorities and public and private non-profit organizations that have operated the SFSP within the current or prior two calendar

- *years* are typically permitted, with advance approval, to operate the program during unanticipated school closures. State agencies have the discretion to waive the application in this situation.
- Pre-approval visits of sponsors operating during unanticipated closures are not required by federal regulations. They may or may not be conducted at the state agency's discretion.

#### o **SSO**:

- School food authorities are likely able to receive approval to operate SSO even if they have not participated in the past. Working proactively with your state agency is important in this situation.
- Child care providers that do not currently participate in the CACFP and communitybased non-profit organizations that are not current CACFP sponsors nor SFSP sponsors within the past two calendar years may have difficulty receiving approval given the usual training requirements and time required for approving applications from new operators.
- The nationwide waivers of on-site monitoring requirements for CACFP and SFSP state agencies allows for the possibility for a desk audit in lieu of an on-site preapproval visit, as confirmed by Questions #15 and #21 respectively in Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers. If the state agency has the capacity to review applications and provide virtual training, it may be possible to receive approval as a new sponsor.
- Community organizations may partner with school food authorities and approved sponsors to help fill any unmet needs.

### 15. Can new sites be approved? Or can only current CACFP sites or past SFSP or SSO sites be utilized?

- It is unclear whether new sites could be approved, especially for community locations and child care providers where health and safety requirements as well as preapproval visits may present barriers without additional waivers.
- SFSP and SSO sites from summer 2019 are likely the best sites to reactivate along with current CACFP sites.
- Distribution points along mobile routes or school bus routes have been approved in many states.
- Sponsors should work with their state agency to determine the best course of action.
   At a minimum, the USDA has confirmed that meals may only be distributed at sites approved by the state agency, including temporary sites.
- For information on home delivery, see Question #25.

#### 16. Where can these programs operate?

- Unless your state agency has received a waiver, SFSP and SSO meals can only be
  provided free of charge to all children ages 18 and under at locations that meet the
  area eligibility requirement: in an area where at least half of students are eligible for
  free or reduced-price school meals according to school or census data.
  - See Question #6 for more information about state area eligibility waivers.
- CACFP At-Risk Afterschool Meals can only be served at locations that qualify as area eligible based on school data.
- A school itself does **not** have to have more than half of its students eligible for free or reduced-price school meals as long as it is within an eligible area.
- You can use the <u>No Kid Hungry Averaged Area Eligibility Map</u> to determine whether
  a location is area-eligible for SFSP or SSO. This is based on USDA guidance around
  the use of census data. This does **not** apply to CACFP At-Risk Afterschool.
- If a school **cannot** qualify as area-eligible and your state does not have an area eligibility waiver (or if the school does not qualify for the state's waiver), it may be able to:
  - Operate as a closed enrolled site in the SFSP. This would involve targeting or limiting the program to free and reduced-price eligible students. Advance communication with and approval from the state agency is critical.
  - Operate the NSLP and SBP, although this may only be an option if the school is implementing distance learning and not closed. See Question #9 in the USDA's guidance on meal delivery through SFSP and SSO.
- For information on home delivery, see <u>Question #25</u>.
- There are no location-based restrictions in the NSLP, SBP, or other components of the CACFP, but all other eligibility requirements of those programs still apply for operators, sites, and participants. Sites must be approved in advance by the state agency.
- 17. In addition to breakfast and lunch through SBP and NSLP, my school used to serve supper through CACFP At-Risk Afterschool and/or snacks through CACFP At-Risk Afterschool or NSLP Afterschool Snacks. Can we continue to do so in addition to serving breakfast and lunch through SFSP or SSO?
  - Once your state adopts and implements the waivers needed to operate CACFP At-Risk Afterschool (see Questions #1, #2 and #5), a school food authority could operate both SFSP or SSO along with CACFP At-Risk Afterschool as long as different meals are provided (i.e. breakfast and lunch through SFSP along with supper and snack through CACFP At-Risk Afterschool).
  - Additionally, a school food authority could partner with a non-profit sponsor to serve afterschool suppers and/or snacks at school sites that are offering meals through SFSP or SSO.

- A non-profit sponsoring organization approved to operate both SFSP and CACFP At-Risk Afterschool could also do both concurrently during unanticipated school closures, again provided that different meals are served and daily meals per day maximums are followed. See Questions #14 & #15 in <a href="Child Nutrition Program Meal">Child Nutrition Program Meal</a> Service during Novel Coronavirus Outbreaks: Questions and Answers #3.
- Schools serving through SBP and NSLP may be able to operate CACFP At-Risk Afterschool and/or NSLP Afterschool Snacks as they usually would.
- At this time, the area eligibility requirement still applies to CACFP At-Risk Afterschool and NSLP Area-Eligible Afterschool Snacks. See <u>Question #6</u> for more information.

#### 18. What are the options for packaging or serving meals? Can we do Offer Versus Serve?

- USDA guidance has said that all meals should be unitized.
- Question #18 in <u>Child Nutrition Program Nationwide Waivers: Questions and Answers</u> 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.
- Offer Versus Serve (OVS) is not currently permitted, even for school food authorities operating the programs.

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

- In <u>COVID-19: Child Nutrition Program Response #4</u>, the USDA offered a nationwide waiver from the meal pattern requirements across all of the child nutrition programs.
- As with all nationwide COVID-19 response waivers, this is 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.
  - We strongly encourage all state agencies to do so as soon as possible and to communicate this to program operators.
- 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.
- Also unlike the other nationwide waivers, the national meal pattern waiver is only available through April 30, 2020 or the end of the public health emergency, whichever is earlier. The other waivers are available until June 30, 2020 or the end of the public health emergency, whichever is earlier.

Additionally, as noted in Question #1 in <u>Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3</u>, 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.

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

 Yes, <u>COVID-19</u>: <u>Child Nutrition Program Response #4</u> includes a reminder that Federal procurement regulations allow procurement by noncompetitive proposals when there is a public emergency.

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

- No. Through a <u>series of nationwide waivers</u>, 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 SFSP, state agency monitoring of sponsors and sponsor reviews or visits to sites may be postponed to summer 2020 if the sponsor or site will operate then.
- 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 elapse between reviews.

### 22. 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
  - Record keeping requirements
    - Note: Questions #18 & #19 in Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers indicate that CACFP operators only need to maintain attendance records for participants who attend the program. If children no longer attend, then attendance records do not need to be kept, though operators still need to ensure integrity, namely that children do not receive duplicate meals.

- Deadlines to submit claims for reimbursement (<u>except for January and</u> February 2020)
- Daily limits on meals per child
  - SFSP or SSO: one breakfast and one lunch or supper, or one meal and one snack
  - CACFP At-Risk Afterschool: any one meal and one snack
  - CACFP child care or family day care home: breakfast, lunch or supper, and snack, or two snacks and any one meal
  - NSLP: one meal per child
  - SBP: one meal per child
- Work with your state agency regarding any other waivers needed.

## 23. What if a school or school district was scheduled to be on spring break or have a professional development day? Can meals still be served through the SFSP or SSO?

- Yes. The USDA clarified in Question #22 of <u>Child Nutrition Program Meal Service</u> <u>during Novel Coronavirus Outbreaks: Questions and Answers #3</u> that during unanticipated school closures, program operators may serve meals through the SFSP or SSO on weekends, breaks, and other days previously scheduled to be nonschool days. States do not need to seek a waiver from the USDA for this, nor do operator need to request one.
- The CACFP At-Risk Afterschool Meals component is also an option during breaks and other non-school days within the school year. Contact your state agency to ensure that the necessary waivers of the congregate feeding and enrichment programming requirements are in place.

#### 24. Can meals be served on weekends?

- Yes. Usually, meals may be served seven days per week through the SFSP and SSO as well as through the CACFP (including CACFP At-Risk Afterschool Meals) as long as programming or care is provided.
- The USDA clarified in Question #22 of <u>Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3</u> that during unanticipated school closures, program operators may serve meals through the SFSP or SSO during weekends, breaks, and other days previously scheduled to be non-school days. States do not need to seek a waiver from the USDA for this, nor do operator need to request one.
  - Check with your state agency before serving meals on or for weekends to confirm approval.

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

- Options may include home delivery; delivery along school bus routes or other mobile routes; and meal pick-up at schools and other locations, including pick up via drivethrough.
- At this time, delivery directing to children's homes is only available to school food authorities and CACFP operators (except CACFP At-Risk operators who do not collect enrollment) since they must contact families, receive consent, and verify their address first. 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 FNS Q&A page: <a href="https://www.fns.usda.gov/sfsp/covid-19-meal-delivery">https://www.fns.usda.gov/sfsp/covid-19-meal-delivery</a>.
  - For guidance regarding home delivery through the CACFP, see Questions #9-13 in <u>Child Nutrition Program Meal Service during Novel Coronavirus</u> 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 #7.
- See Question #4 for information about distributing meals without a child present.
- For additional ideas and strategies on non-congregate meal service, see our resource <a href="https://bestpractices.nokidhungry.org/resource/emerging-strategies-tactics-meal-service-during-school-closures-related-coronavirus">https://bestpractices.nokidhungry.org/resource/emerging-strategies-tactics-meal-service-during-school-closures-related-coronavirus</a>.
- 26. 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.

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

 <u>Pandemic-EBT</u> (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 who do not already receive SNAP, state agencies will provide these children 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 <u>submit a P-EBT implementation plan</u> to the USDA for approval.
- See our FAQ on P-EBT and Coronavirus Response SNAP for more information.

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

· Yes, it is our understanding that both options could operate concurrently.

### 29. 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 child care or preschool programs within schools and received free or reduced-price meals through the school may be eligible, though.