

Comparison of Usual Summer and Afterschool Meal 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 6/1/2020.

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 approve state waiver requests 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 as well as states' individually requested and approved waivers <ul style="list-style-type: none"> Extended to August 31, 2020 by COVID-19 #22 Parent may pick up meal on child's behalf with verification of eligible child under COVID-19 #5 <ul style="list-style-type: none"> Extended to August 31, 2020 by COVID-19 #25
	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> <ul style="list-style-type: none"> Per child per day, up to: <ul style="list-style-type: none"> Breakfast + lunch/supper OR Any one meal + snack <p>*Different for camps and migrant sites</p> <ul style="list-style-type: none"> Sites permitted to serve meals for multiple days at the same time must still comply with daily limits If also serving through CACFP At-Risk, different meals must be served through each program <ul style="list-style-type: none"> This is not permitted after June 30, 2020
	Days of Operation	<ul style="list-style-type: none"> Allows for weekend service and service up to seven days per week Allows for service on holidays during summer break or intersession breaks for students attending year-round schools Service during planned school closures or non-school days during the regular school year (like spring break) is not permitted 	<p>SAME</p> <p>Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3 (Question #22) confirmed that weekend service and service during other non-school days, including spring break, is permitted during unanticipated school closures</p>

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SFSP / SSO	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 <ul style="list-style-type: none"> ◦ COVID-19 #17 extends meal service time flexibilities through Sept. 30th • With approval and in conjunction with the non-congregate waiver, sites may distribute meals for multiple days at one time, up to one week • Meal distribution or delivery times must still be established
	Site Eligibility	<ul style="list-style-type: none"> • Sites (including stops on mobile routes) must be pre-approved by the state agency • 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 <ul style="list-style-type: none"> ◦ COVID-19 #14 allows closed enrolled sites to use area eligibility for summer 2020 <p>*Different for camps and migrant sites</p>	<p>SAME</p> <ul style="list-style-type: none"> • Sites (including stops on mobile routes) must be pre-approved by the state agency • Sites must meet applicable health & safety standards • Open sites: located in areas with ≥50% free/reduced-price eligible based on school or census data <ul style="list-style-type: none"> ◦ Contact your state agency about implementing an area eligibility waiver to operate an open site at a location that does not meet this threshold • 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 ◦ COVID-19 #14 allows closed enrolled sites to use area eligibility for summer 2020
	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 through August 31, 2020 under COVID-19 #25

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SFSP / SSO	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 <ul style="list-style-type: none"> ○ When adopted by states, COVID-19 #16 permits OVS for all sponsors during summer 2020 	<p>SAME</p> <ul style="list-style-type: none"> • Under COVID-19 #4 and its extension through COVID-19 #17, #24 & #26, waivers may be given on a case-by-case basis if operators cannot source items needed to meet requirements • Per Questions #1-2 in Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3, state agencies may waive the requirement for multiple milks to be offered in the SSO or may allow operators to serve meals without milk if emergency conditions prevent them from obtaining milk without receiving a USDA waiver • OVS is not recommended for non-congregate meals, but per Question #13 in SFSP & SSO Nationwide Waivers – Questions and Answers, it may be used if the site can do so safely and correctly <ul style="list-style-type: none"> ○ When adopted by states, COVID-19 #16 permits OVS for all sponsors during summer 2020 • Question #18 in Child Nutrition Program Nationwide Waivers: Questions and Answers allows for bulk item distribution with some restrictions and guidelines
	Daily Records <i>Does not include financial, training, monitoring, and other sponsor-level records</i>	<ul style="list-style-type: none"> • Meal counts, separated by meal type and by: <ul style="list-style-type: none"> ○ First meals served to eligible children ○ Second meals served to eligible children ○ Meals served to adults performing food service labor (<i>allowable cost but not reimbursed</i>) ○ Meals served to non-program adults, if any (<i>neither allowable cost nor reimbursable</i>) ○ Excess or leftover meals ○ Non-reimbursable meals • Count of meals prepared or delivered, by type • Menus 	<p>SAME</p> <ul style="list-style-type: none"> • Meal counts, separated by meal type and by: <ul style="list-style-type: none"> ○ First meals served to eligible children ○ Second meals served to eligible children <ul style="list-style-type: none"> ▪ Check with your state agency before claiming any second meals. ○ Meals served to adults performing food service labor (<i>allowable cost but not reimbursed</i>) ○ Meals served to non-program adults, if any (<i>neither allowable cost nor reimbursable</i>) ○ Excess or leftover meals ○ Non-reimbursable meals • Count of meals prepared or delivered, by type • Menus

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
SFSP / SSO	Claim Submission Deadlines	Claims for reimbursement are due 60 calendar days after the end of the claim month	Under COVID-19 #12 , the deadlines for January and February 2020 claims have each been extended by 30 calendar days
	Procurement	Operators must comply with applicable procurement standards and procedures for the size of the purchase or contract	<ul style="list-style-type: none"> • COVID-19 #4 reiterates that Federal procurement regulations allow for noncompetitive proposals during a public emergency • COVID-19 #19 extends food service management company contract duration and extension limits
	Site Monitoring	<ul style="list-style-type: none"> • Except where waivers are granted, SFSP sponsors are required to conduct: <ul style="list-style-type: none"> ○ 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 • With COVID-19 #15, first week site visits may be waived in certain circumstances in summer 2020 	<ul style="list-style-type: none"> • Under COVID-19 #10, sponsors are not required to conduct on-site visits or reviews but should conduct desk audits to ensure integrity • With COVID-19 #15, first week site visits may be waived in certain circumstances
	Unanticipated School Closures	<ul style="list-style-type: none"> • Available with above provisions from October through April • 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 	<ul style="list-style-type: none"> • Under COVID-19 #21, unanticipated school closure operations may continue through June 30, regardless of school closure status • 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 congregare requirement under COVID-19 #2 <ul style="list-style-type: none"> ○ Extended to June 30, 2021 by COVID-19 #33
	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 expired June 30, 2020

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CACFP At-Risk	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 Sites permitted to serve meals for multiple days at the same time must still comply with daily limits If also serving through SFSP/SSO, different meals must be served through each program <ul style="list-style-type: none"> This is not permitted after June 30, 2020
	Days of Operation	<ul style="list-style-type: none"> Allows for service on weekends, breaks, and other non-school days during the school year as long as it is during the program's hours of operation and activities are available Programs may change meals offered and meal times if program hours are different on non-school days 	<ul style="list-style-type: none"> Service is permitted on weekends, breaks, and other non-school days during the school year (which includes during unanticipated school closures) <ul style="list-style-type: none"> Under COVID-19 #21 and its Q&A, CACFP At-Risk could continue through June 30, 2020. Due to COVID-19 #3, meals may be provided even if the program is closed and no activities are provided
	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 	<ul style="list-style-type: none"> Under COVID-19 #1 and its extension, any federal meal time restrictions have been waived, allowing states to approve of more than one meal being served at a time SP 13-2020 clarified that CACFP sponsors may be approved to distribute meals for more than one day at a time, up to a weeks' worth of meals per distribution
	Site Eligibility	<p>Sites must:</p> <ul style="list-style-type: none"> Be pre-approved by the state agency Meet applicable health & safety standards Be located in eligible areas with ≥50% free/reduced-price eligible based on school data only 	<p>SAME</p> <p>Sites must:</p> <ul style="list-style-type: none"> Be pre-approved by the state agency Meet applicable health & safety standards Be located in eligible areas with ≥50% free/ reduced-price eligible based on school data only
	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 Programs may charge a fee for activities or care but not meals

Program	Provision	Usual Program Provisions	Current COVID-19 Flexibilities
CACFP At-Risk	Meal Requirements	<ul style="list-style-type: none"> See CACFP meal pattern requirements 	<p>SAME</p> <ul style="list-style-type: none"> Under COVID-19 #4 and its extension through COVID-19 #36 to June 30, 2021, waivers may be given on a case-by-case basis if operators cannot source items needed to meet requirements Per Questions #1 in Child Nutrition Program Meal Service during Novel Coronavirus Outbreaks: Questions and Answers #3, state agencies may, without receiving a USDA waiver, allow operators to serve meals without milk if emergency conditions prevent them from obtaining milk
	Daily Records <i>Does not include financial, training, monitoring, and other sponsor-level records</i>	<ul style="list-style-type: none"> Attendance <ul style="list-style-type: none"> Options include dated rosters or sign-in sheets; work with your state agency on other acceptable methods Attendees do <i>not</i> need to be pre-registered or enrolled Meal counts, separated by meal type <ul style="list-style-type: none"> Separate count required for any meals served to adults who perform foodservice labor (<i>allowable cost but not reimbursed</i>) Count of meals prepared or delivered, by type Menus 	<p>SAME</p> <ul style="list-style-type: none"> Attendance <ul style="list-style-type: none"> Options include dated rosters or sign-in sheets; your state agency may approve other methods Attendees do <i>not</i> need to be pre-registered or enrolled Question #19 in Questions and Answers related to the Child Nutrition Program Monitoring and Reporting Nationwide Waivers clarifies that attendance is not needed if the program is closed as long as there are necessary accountability and integrity measures in place Meal counts, separated by meal type <ul style="list-style-type: none"> Separate count required for any meals served to adults who perform foodservice labor (<i>allowable cost but not reimbursed</i>) Count of meals prepared or delivered, by type Menus
	Claim Submission Deadlines	Claims for reimbursement are due 60 calendar days after the end of the claim month	Under COVID-19 #12 , the deadlines for January and February 2020 claims have each been extended by 30 calendar days.
	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

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CACFP At-Risk	Site Monitoring	CACFP sponsors are required to conduct: <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 	Under COVID-19 #7 and its extension to August 31, 2020 by COVID-19 #27 : <ul style="list-style-type: none"> • No monitoring activities are required to be done on-site • 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 School Closures	<ul style="list-style-type: none"> • Available with above provisions 	SAME <ul style="list-style-type: none"> • Available with above provisions and flexibilities