

School Nutrition Programs COVID-19 Frequently Asked Questions (FAQ): Volume 1

1. **Question:** Can multiple meals (i.e. breakfast and lunch) be distributed at one time? Can multiple days' worth of meals be distributed at one time?

Answer: Yes. Vermont is automatically allowing any school food authority (SFA) to distribute one days' worth of meals (i.e., breakfast at lunch) at one time.

If the SFA would like to distribute more than one days' worth of meals, please email child nutrition programs to alert us that you plan to do this, and tell us your plan for ensuring that duplicate meals will not be served. For example, if you plan to distribute on Monday, Wednesday and Friday and distribute 2 days' worth of meals on Monday and Wednesday, and three days' worth of meals on Friday, that would be fine. Generally, we are capping requests to distribute multiple days of meals at one time at 7 days' worth of meals, due to food safety and storage concerns. However, if you have a reason you need to distribute more than 7 days' worth of meals at a time, please let us know and we will approve on a case-by-case basis.

If distributing for multiple days at a time, please include food safety labeling such as temperature instructions and expiration dates.

2. **Question:** Can we distribute meals on weekends?
3. **Answer:** Yes, if you are using the Summer Food Service Program or Seamless Summer Option. Please make sure to select Saturday and Sunday on your site application. If you are operating SSO, you will need to follow the NSLP 7-day meal pattern. If you are using the NSLP/SBP because you consider these "days to be days of operation," you can't claim for reimbursement for weekend meals unless your school considers those weekend days to be "days of operation."
4. **Question:** Does the student need to be present to take the meal?

Answer: No. This may change if USDA issues additional guidance. However, current guidance from USDA says that meals may be delivered to households without students present. Vermont Child Nutrition Programs is interpreting this to mean that students also do not need to be present during pickup. Please note that other states have interpreted this differently. If USDA issues additional guidance, we may update this answer.



5. **Question:** Can households leave a cooler out for the meals to be placed in?

Answer: Yes, as long as the household has communicated to the SFA how many children need meals, the household may leave a cooler out for the meals to be placed in. This answer could change if additional USDA guidance is received.

6. **Question:** Can we provide meals to adults?

Answer: You cannot receive USDA reimbursement for adult meals, and adult meals are not an allowable program cost. However, you may certainly charge for adult meals (just use your regular adult meal rate!), or find non-federal funds to cover the cost of the adult meals. Adult meals are considered non-program revenue and should be tracked.

7. **Question:** Can we provide meals to students with disabilities who are over age 18?

Answer: Yes, USDA regulations allow the SFSP/SSO to be served to persons older than 18 who are determined by a State educational agency or a local public educational agency of a State to be mentally or physically disabled and who participates in a public or nonprofit private school program established for individuals with disabilities may be served. If your school serves students with disabilities who are over 18, they may be provided meals.

8. **Question:** I'm worried that I won't have enough staff to prepare the meals if my staff get sick or need to stay home to take care of their children.

Answer: If you need volunteers, look to your local community first. If you can't find enough volunteers there, call the State Emergency Operations Center at 1-800-347-0488 and describe the resource need. Make sure any volunteers who are preparing meals receive basic food safety training prior to starting work. If volunteers will learn student information, please provide confidentiality training.

School Food Service Personnel are included as essential workers who should continue to have access to child care, according to the governor's March 17th [Directive on Provision of Services to Children of Essential Persons During Closure Period in Response to COVID-19](#), so food service staff should have child care services available to them. To request child care, please complete the [Essential Persons Child Care Request Form](#).

Finally, you can consider consolidating your food service operations into one central kitchen, or even working with neighboring supervisory unions to prepare meals together in one kitchen. If you are changing your food production facility, please update your SFSP application packet.

9. **Question:** Do the meals need to be non-perishable?

Answer: No, you may serve perishable foods. However, please keep hot foods hot and cold foods cold during distribution, and provide labeling to instruct the households about how to handle the foods correctly and when to dispose of them if they are not eaten. Recent USDA guidance does require that meals be shelf stable if they are to be delivered and no one will be present to receive the delivery.

10. **Question:** Can I use some of my frozen foods to make meals for households to heat up at home?

Answer: Yes, as long as you are creating a meal that meets the meal pattern requirements, you can make a meal that is meant to be heated at home. Please only use pre-cooked foods when doing so, and include good instructions for how to re-heat the meal. Please also plan an alternative meal that is available for families who may not have a way to reheat foods.

11. **Question:** How do I protect my staff from the virus?

Answer: Kitchen staff should work in small groups with little close interaction and keep a 6-foot distance, if possible. Instead of working together in a small kitchen, consider moving worktables out into the cafeteria to spread out workspaces. You may be able to bring in additional worktables and other equipment from closed buildings to make more work space to spread out in.

Instruct staff to stay home when they are sick, and make sure you have enough staff coverage planned that no one feels pressure to come in when they are sick.

If you need to have a regular check-in or planning meeting with a large number of staff, consider doing it outside or in a large room and remind staff to stand apart from each other. Consider ways to conduct check-in and planning meetings via telephone, email, or video conference.

When delivering meals, ensure that a 6-foot distance is maintained between the delivery person and the recipient. Some schools are instructing families to leave coolers outside to place the meals in, when conducting home deliveries. When offering grab and go, some schools are having staff place the meals on cart or tables and step back before the recipient comes forward to take the meal. Clear signage can help tell recipients what to expect and where they should go. Tape can be used to mark off a 6-foot spacing on the floor or sidewalk. Additional suggestions for safe distribution are included in the [Guidance on Non-Congregate Feeding During School Closure or Dismissal due to a Novel Coronavirus Outbreak](#).

12. **Question:** How can I plan how many meals I will need to serve?

Answer: Many SFAs are using a web-form, email address or telephone number to ask families to indicate how many meals they expect to want. For the SFAs that are doing home deliveries, asking families to complete a web-form or send an email requesting meals serves the dual purpose of helping you estimate the number of meals and getting written consent for home delivery. Several companies who make menu planning software and Point of Sale Systems are also offering free products to help SFAs manage orders.

13. **Question:** If childcare, HeadStart or other sites participating in CACFP are closed can the children enrolled in these programs receive meals at their local school?

Answer: If the local school is participating as an area eligible open site in SSO/SFSP, then meals are available to all children in the community that are 18 years old or younger. If the school does not qualify as an area eligible site in the SFSP/SSO or is operating NSLP/SBP, only children enrolled at that school and other children in their household are able to receive meals.

14. **Question:** We have food or supplies that we won't be able to use as a result of the closure. What can we do with it?

Answer: If prepared meals or perishable foods (milk, produce) are not able to be used by the food service program as a result of an unplanned school closure, School Food Authorities are reminded that they may donate these foods to a 501(c)3 nonprofit, or to another federal child nutrition program. Unused foods may not be provided directly to individuals.

15. **Question:** Can USDA Foods or USDA DoD Fresh be used to prepare meals in the SFSP/SSO?

Answer: Yes. USDA Foods and USDA DoD Fresh may be used to prepare meals for SFSP/SSO or NSLP/SBP. It is a good idea to track the quantity and type of USDA Foods used, as it may be possible to receive reimbursement or replacement of these foods in the future. The USDA DoD Fresh program is continuing to operate, so SFAs may continue to place orders for delivery. If there are specific produce items that you would like to be made available through this program, please contact Child Nutrition Programs.

16. **Question:** Can we use FFVP Funds to provide fruits and vegetables for delivery to families or to make the meals that we are providing? What happens to FFVP funds if we won't be able to use them.

Answer: The State doesn't have the authority to allow an alternative use of FFVP funds without the approval of USDA. Vermont and other state agencies have reached out to

USDA to ask for some flexibility with these funds, but have not yet had a response. Until USDA approves other uses of these funds, they cannot be used while school is closed.

17. **Question:** Our school is a licensed childcare and will be providing childcare to essential personnel. Will operating grab-and-go from our location affect our licensing caps?

Answer: No. If you are operating grab-and-go meal service out of your location, it will not impact your childcare licensing capacity.

18. **Question:** Does the SSO or SFSP application need to be approved prior to beginning meal service at sites?

Answer: Yes. Child Nutrition Programs must be notified if a Sponsor plans to serve meals during an unanticipated school closure and an SFSP or SSO application must be submitted. Once the State agency has received the application, confirmed eligibility of the sites to operate, and approved the application, the Sponsor may begin to serve meals and claim meals. The SFSP/SSO application must be submitted and approved prior to serving meals in order to be eligible for reimbursement. If the SFA would like to add additional sites, they must add site applications to their application, and re-submit the application for approval.

19. **Question:** Is the district required to submit a Media Release to advertise their service of free meals under SSO/SFSP?

Answer: No. Sponsors are not required to submit a Media Release but are required to advertise within the community that free meals are available during the unanticipated school closure. This can be done in a number of ways. Some examples are message boards in front of the school, phone trees, local media, social media, email lists, the school website, the school's online learning platform, and 2-1-1.

Please consider ways to reach area children enrolled in programs participating in CACFP that may also be affected by the closure of childcare centers or Headstart programs.

20. **Question:** If we are delivering meals by bus, does every bus stop need to be listed as a site in our online application?

Answer: If you are planning to stop at the bus stop for 30 minutes or more, please list the site separately in the site application. Otherwise, include the information about planned stops in Question 43 of your site application.

Please note: This is an area where Child Nutrition Programs advice has changed slightly as we have gone through the process. If you didn't do this initially, please feel free to modify your application to add the additional sites, and re-submit the application. This answer also may change if more guidance is received from USDA.

21. **Question:** How do I determine Average Daily Participation of the Site? What is Average Daily Participation used for?

Answer: The site application asks for Average Daily Participation as an edit check to ensure that you don't claim more meals than you could possibly have served. Schools should enter their student enrollment under ADP unless students from multiple schools will be served under one site – in that case, add the school enrollments together. If you are an open site serving many meals to younger siblings or other children not usually enrolled in your school, contact Child Nutrition Programs to increase your ADP. Per USDA regulations, any necessary adjustments to ADP must be made prior to submitting the claim for reimbursement. ADP may not be adjusted after the claim is submitted.

22. **Question:** What is area eligibility? Why is it so important? Can the state waive the area eligibility requirements?

Answer: Area eligibility is a determination that the location is low income. There are a number of complicated ways of determining area eligibility. Child Nutrition Programs has evaluated every school in the state to find as many area eligible schools as possible. 207 Vermont Schools are area eligible, but 114 are not. Area eligible schools may provide meals to any child 18 and under as an open site. Non-area eligible schools may only provide meals to their enrolled students and other children in those households, and must document the names of the children who are provided meals to claim by student status.

Area eligibility is a USDA requirement. Child Nutrition Programs has tried to be as flexible as possible in determining area eligibility, but unfortunately we do not have the authority to waive this federal requirement. Child Nutrition Programs has advocated that USDA waive this requirement for all states, but so far USDA has not done so. New federal legislation may change or remove this requirement. Until this requirement is removed, the state does not have the power to waive the requirement.

23. **Question:** Our school is not currently area eligible. If we receive new income applications or direct certification information from families this month, and it increases our Free and Reduced percentage to be higher than 50%, can we become area eligible?

Answer: Yes. USDA regulations allow the state agency to accept new information to establish area eligibility. If you now have a higher increased free and reduced percentage as a result of new income applications, you can submit your new information (including the total number of students who qualify for free and reduced meals, and total enrollment) to Child Nutrition Programs to determine if you are area eligible.

Many families are experiencing new economic hardship as a result of COVID-19. Non-area eligible schools may encourage households to submit new income applications if their economic status has changed.