

Serving School Meals During COVID-19 in SY 2020-21 Q&A

Under the National School Lunch Program (NSLP)

Below are answers to common questions related to serving school meals during COVID-19 in the school year (SY) 2020-21. These questions and answers are specifically for SFAs operating under the National school Lunch Program during SY 2020-21. If your SFA is operating the Summer Food Service Program (SFSP) or Seamless Summer Option (SSO) this fall, please refer to the [Serving School Meals under the SFSP or SSO During COVID-19 in SY 2020-21 Q&A](#).

Click on a heading topic under the Table of Contents below to find information about a specific area. If your question and answer is not featured within this document, please contact DPIFNS@dpi.wi.gov.

New/updated weeks of 9/7/20 and/or 9/14/20



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School Meal Service Options for the start of the 2020-21 School Year

1. What options do school food authorities (SFAs) have for providing school meals in SY 2020-21?

On August 31, USDA released [COVID-19: Child Nutrition Response #56](#), which allows the National School Lunch Program Seamless Summer Option (SSO) and Summer Food Service Program (SFSP) to continue to operate through **December 31, 2020**. Under this waiver, SFAs may choose to serve meals through the National School Lunch (NSLP) and School Breakfast Programs (SBP) to students based on eligibility, or through the SFSP or SSO. This waiver does not require SFAs to transition to SFSP or SSO operations. FNS reserves the right to withdraw this approval subject to availability of funding.

The USDA extended the area eligibility, non-congregate feeding, meal service time flexibility, and parent/guardian pick up waivers for the SFSP and SSO through December 31, 2020. Therefore, schools who provide in-person learning, virtual or a hybrid education model may serve meals to students in person, through a drive through or delivery option.

To assist your agency in determining the best option, please reference the [Serving School Meals during SY 2020-21 Program Flow Chart](#).

Summer Food Service Program (SFSP)

Sponsors (SFAs and non-school organizations) that have a SFSP contract may continue to operate under the SFSP through December 31, 2020.

Update the SFSP contract within [FNS Online Services](#) following the specific instructions provided in the [Requirements and Deadlines for 2020](#) guidance.

- Ensure that all sites are included in the contract. All drive thru sites require a site application. Mobile Routes may have one site application this year, but details regarding each stop must be provided to DPI (location and times of meal service). Route changes must be communicated to your assigned consultant.
- Continue to provide updates to your local health department/sanitarian when new sites are added to your Program.
- Any SFA operating the SFSP will be placed in claims withholding for the NSLP. An update to the school nutrition contract will be required to delay the program start dates to begin when you transition back to NSLP.

Seamless Summer Option (SSO)

SFAs may elect to operate the SSO through December 31, 2020. Under SSO, all NSLP, SBP and/or Afterschool snack program requirements still apply. Meals may be provided at no charge to students at open, restricted open or closed enrolled sites and are reimbursed at the applicable programs free reimbursement rates. **Reminder, only non-school locations may operate as a closed enrolled site.** More information can be found on the [SSO webpage](#).

How to participate in SSO (September 1 - December 31, 2020):

1. Complete the [SSO application](#) for meal service locations in operation between September 1 - December 31.
2. The 2020-21 school year school nutrition contract already includes all SBP, NSLP and Afterschool Program sites and dates of operation. If any program sites change as a result of SSO, [contact the School Nutrition Team](#).

National School Lunch Program (NSLP)

SFAs may provide meals to students through the NSLP, SBP and/or Afterschool Snack Program, as usual. All program requirements still apply. Students would be charged and meals claimed based on the student’s eligibility status. These sites may not operate as an open site.

USDA extended the [non-congregate waiver](#) for the NSLP (including Afterschool Snack program), and SBP. SFAs operating NSLP have the option to elect the non-congregate waiver for SY 2020-21.

- If your SFA **HAS NOT** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), the SFA is subject to the congregate feeding requirements and would not be able to provide meals under NSLP/SBP to virtual students. By not electing this waiver, you are only feeding students who are attending school in a school building.
- If your SFA **HAS** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), meals must be offered to every enrolled student whether they attend virtually or in-person. Please ensure this waiver is completed to elect the non-congregate feeding waiver.

Meal Pattern

2. If we are only feeding 2-3 days a week, how would that impact the vegetable subgroups?

SFAs are still expected to serve a variety of vegetable subgroups to students. When schools experience shortened 3- or 4-day weeks due to holidays, the weekly requirements are not adjusted by 20% or 40%, respectively. Rather, the amount of “Additional” vegetables served can be adjusted. An example of a 3-day week is below.

3 Day School Week	Elem/Middle (K-8)	High School (9-12)
Weekly Vegetable Total	2 ¼ cups	3 cups
Dark Green	½ cup	½ cup
Red/Orange	½ cup	1 cup
Legumes	½ cup	½ cup
Starchy	½ cup	½ cup
Other	¼ cup	½ cup

Additional short and long week meal patterns, including vegetable subgroup requirements, are available on the [USDA’s Food and Nutrition Service website](#).

3. How do we offer the vegetable subgroups if students come to school with an A/B schedule?

The intent of the vegetable subgroups for the lunch meal pattern is to ensure all students are offered a variety of vegetables over the course of the week. If students are grouped into an A/B schedule by weeks, the meal pattern must be followed as normal. If the A/B schedule is by day, (e.g. Monday and Tuesday group A is onsite, and Thursday and Friday group B is onsite, with all non-onsite days attended virtually) the meal pattern would still need to be followed, however the menu planner can create menus that are best served in the model being used each day. Please refer to the [Menu Planning for Multiple Attendance Options](#) for additional details and menu planning examples.

4. How do we stay within the dietary specifications (sodium, calories, saturated fat) for more pre-packaged meals due to COVID-19?

Pre-packaged meals tend to have more processed items such as deli meat and cheese, which contain higher amounts of sodium. Balancing these food items with fresh produce or low-sodium canned vegetables may assist in meeting the dietary specifications. Reading and comparing labels/nutrients prior to purchasing these products will also help make better choices for meeting average daily dietary specifications.

5. We have been notified of the vacated 2018 Final Rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements, resulting in the return to the requirements of the 2012 final rule (i.e. flavored milk may be only skim; all grains served in the NSLP and SBP must be whole-grain rich; and school lunches and breakfasts offered through the NSLP and SBP must meet [Target 2 weekly sodium levels](#)). What if we cannot meet these requirements right away for the school year 2020-21?

It is understood that procurement for SY 2020-21 was underway when this decision and announcement were made. Therefore, use of the nationwide meal pattern flexibility waiver is allowable if the 2012 requirements cannot be met for this school year. SFAs may submit a [meal pattern flexibility request](#) to apply for this waiver.

6. Are there any meal pattern flexibilities available, such as milk variety and vegetable subgroups?

The USDA issued [COVID-19: Child Nutrition Response #36, Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs - Extension 4 \(CNP\)](#). This waiver allows SFAs and sponsoring agencies the ability to ask for flexibility to serve meals that do not meet the meal pattern requirements.

SFAs and sponsoring agencies can continue to request flexibilities for meal pattern requirements. Flexibilities must be approved by a member of the School Nutrition Team. [Meal pattern waiver requests](#) are approved on a case-by-case basis. Justifications that may be approved include: procurement/availability issues, unresolvable food safety concerns, difficulty meeting the Target 2 sodium level, providing required milk types or a variety of milk, or serving 100% whole grain-rich requirements for SY 2020-21, and minimizing potential exposure to COVID-19 while supporting nutritious meals. Requests will not be approved due to preference, student acceptance, and waste. If new component disruptions occur, additional waiver requests must be submitted.

Agencies must resume normal meal pattern requirements as soon as products become available. Keep in mind it is always best practice to provide children with a variety of healthy options that align as closely as possible with the meal pattern requirements. Approved waivers are valid through June 30, 2021, after which all meal pattern requirements are reinstated.

7. What if we are unable to procure allowable milk or no milk at all?

The USDA issued [COVID-19: Child Nutrition Response #36, Nationwide Waiver to Allow Meal Pattern Flexibility in the Child Nutrition Programs - Extension 4](#), which allows the DPI to grant meal pattern flexibility waivers, including the milk component, to NSLP/SBP programs experiencing difficulties with: procurement/availability, unresolvable food safety concerns, providing required milk types, and minimizing potential exposure to COVID-19 while supporting nutritious meals. If you are participating in one of these programs and currently experiencing a difficulty procuring and serving the milk component per meal pattern requirements, a [meal pattern flexibility request](#) may be completed.

Agencies must resume serving the normal milk meal pattern requirements as soon as products become available. Approved waivers are valid until June 30, 2021 after which time all meal pattern requirements are reinstated.

8. If we need to provide meals to virtual students, do we also have to follow all of the vegetable subgroups for packed lunches?

Yes, vegetable subgroups must be followed for the appropriate age/grade group. However, if there is a targeted and justified need to alter the subgroups to help support access to nutritious meals while minimizing potential exposure to COVID-19, an SFA may submit a [meal pattern flexibility request](#).

9. Can we serve all age/grade groups one meal pattern?

Yes. The nationwide meal pattern flexibility waiver does allow for one meal pattern to be served to all age/grade groups virtually and on-site, when justified based on plans to support access to nutritious meals while minimizing potential exposure to COVID-19. SFAs may submit a [meal pattern flexibility request](#) to apply for this waiver.

When possible, schools are encouraged to use the overlap between the requirements in different age/grade groups to offer a single menu to multiple grade groups without the use of the meal pattern waiver. For example, schools may offer the same breakfast menu to all children in grades K-12. Likewise, schools may offer the same lunch menu to all children in grades K-8. If an SFA requests to serve the K-8 meal pattern to all K-12 students, it is encouraged to provide extra food to grade 9-12 students, like an extra piece of fruit, whenever possible. Schools may include preschool students in their one meal pattern waiver requests.

10. Can different age/grade groups pick up meals at one time if we follow the appropriate meal patterns? And if a parent picks up the meal(s) for multiple students at home in different age/grade groups, how do we know that a K-5 student or a 9-12 student is getting the proper meal as packaged at home?

Yes. Multiple age/grade groups can pick up their meal(s) at the same time. SFAs must provide meals to students based on their age/grade group unless a waiver has been submitted by an SFA and approved by a member of the SNT. Consider labeling meals for pick-up based on this information (e.g. elementary, middle, high school) or including a daily menu with serving sizes, so students receive the appropriate amount of food.

11. Can a parent pick up meals for all their students at one building? If yes, do they have to give meals following the meal pattern for the student or can they follow the meal pattern of the school?

The [National Waiver \(#35\) to Allow Parents and Guardians to Pick Up Meals for Children—Extension 2](#) allows parents and guardians to pick up meals for all their children. The school district may configure the meal service that best suits its student population. However, meals **must meet** the meal pattern requirements for each age/grade group, and the district must ensure that children receive reimbursable meals that align with their age/grade group (i.e. meal pattern) unless the SFA has received approval for a meal pattern flexibility waiver. SFAs may submit a [meal pattern flexibility request](#) to serve one meal pattern to all age/grade groups at lunch.

12. What about 3K and 4K students that are usually co-mingled, but will now be served in the classroom this year? What meal pattern do we follow?

When 3K and 4K students are served in the classroom, they are not co-mingled. Therefore, they must be served the [infant and preschool meal pattern](#) unless they have an approved [meal pattern flexibility request](#) that allows one meal pattern for all age/grade groups. Schools may include preschool students in their one meal pattern waiver requests.

13. If we are in a joint agreement, do we still need to complete the Meal Pattern Flexibility Waiver?

Yes. SFAs need to know/understand what meals are served to their students. Therefore, they need to be responsible for filling out the form AND receiving approval from DPI. Each separate SFA must have a waiver, so the SFA providing the meals should work with the joint schools to get the waiver submitted.

14. The NSLP and SBP have established time frames for serving breakfast and lunch. Can this requirement be waived?

Yes. The USDA issued [COVID-19: Child Nutrition Response #34: Nationwide Waiver of Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program - EXTENSION #2](#), which removes parameters on the timing of lunches and breakfasts under the National School Lunch and School Breakfast Programs..

Therefore, SFAs and sponsoring agencies can serve meals when it is most convenient for households. Multiple days' worth of meals may be served all together, lunch served with breakfast for the next day or any other combination.

SFAs may complete a [meal service time flexibility](#). Approved waivers are valid until June 30, 2021.

15. Can the SFA package and distribute frozen food items (e.g. precooked chicken nuggets) for families to heat at home as part of the reimbursable meals?

Yes, as long as specific measures are taken. These food items must meet the applicable NSLP/SBP meal pattern requirements in order to be served as part of the reimbursable meal. Additionally, SFAs should ensure that these types of food items are distributed with clear cooking instructions for the household to follow, including directions to heat the food to an internal temperature of 165 degrees F before consuming. For frozen items, the SFA should also communicate safe storage guidelines if the foods will not be prepared and eaten immediately. Safe storage guidelines for items intended to be heated at home should advise that the foods be held at 41 degrees F or below (or kept frozen, if applicable) until used.

SFAs should consider the kitchen equipment and food preparation requirements involved in the meals provided, as households may be limited. Please reference the [USDA Memorandum SP 13-2020](#) for further guidance.

If SFAs choose to include frozen food items in the meals, items should be labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. SFAs should not distribute any raw animal-based time/temperature control for safety (TCS) food items, such as raw chicken, raw eggs, raw beef, etc. There are many frozen [State Processed Products](#) available that could be incorporated into reimbursable meals.

If you are unsure if a frozen item may be considered “fully cooked,” “precooked,” or “ready-to-eat,” please contact your local regulatory authority and/or sanitarian to discuss your specific question and obtain additional guidance. If you have questions about a state processed product on the list above, please contact a [DPI USDA Foods team member](#).

16. Can the SFA package and distribute shelf-stable foods (e.g. dry pasta, dry beans, etc.) that need to be cooked at home as part of the reimbursable meals?

While there are minimal food safety concerns with providing these types of food items, there are other important considerations. Program operators must consider how these types of dry items may credit in the NSLP/SBP meal pattern when cooked. Further, the [USDA Memorandum SP 13-2020](#) advises that program operators should:

- Consider whether households have access to refrigeration, stoves, microwaves, etc., when providing food that requires refrigeration or further preparation, such as reheating; and
- Ensure that only minimal preparation is required and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

17. It is becoming difficult for my agency to source disposable, portion-controlled food storage containers, like clamshells. What other options do I have to package meals?

SFAs may have to adapt and utilize alternative food storage containers not typically used or procured. Suggestions include, but are not limited to: aluminum foil, portion cups with lids, paper boats with plastic wrap, wax paper to wrap a sandwich, ziploc bags, styrofoam cups with lids, or even banana leaves. Banana leaves are available frozen at most grocery stores.

Offer versus Serve (OVS)

18. Is there a waiver for Offer versus Serve at the high school level?

Yes. USDA issued [COVID-19: Nationwide Waiver to Allow Offer Versus Serve Flexibility for Senior High Schools in the NSLP for SY 2020-2021](#), which allows OVS to be waived at the high school level. To utilize this flexibility, please complete an [OVS waiver](#).

19. Can we implement OVS with a pre-ordering system? Or does it need to be at the point of sale? Are we allowed to offer two meal choices within the OVS pre-ordering system?

Yes, it is allowable to implement OVS with a pre-ordering system. According to the [OVS Manual](#), there is no requirement that the student must be able to make their OVS selections on a serving line. Therefore,

the choice given to the student or parent(s) during the pre-ordering process is allowable. Be aware that the structuring of the meals based on student selections must be carefully checked to ensure provided meals are reimbursable. Also, you may offer two different meal choices within the pre-ordering system. Each meal, no matter the entree choice, must offer all five food components in their appropriate portion sizes for lunch and all four food items in their appropriate portion sizes for breakfast.

20. When putting a breakfast and lunch meal together in a bag (for parent pickup), can the bag contain a reimbursable meal using OVS (e.g. cereal, milk, juice for breakfast, and pizza, marinara cup, milk for lunch) or must all the items be put in every bag (each meal as a unit)?

In order to use OVS for pre-packaged meals, students must have the ability to choose which menu items to decline. This could be done through a pre-ordering system, which allows students to select what they want, or during the distribution process, where students can make at the time of meal pick up.

21. How do we handle Special Dietary Needs for students to make sure we have the correct allergy or texture modified meal available during virtual distribution of meals?

SFAs must accommodate special dietary requests that are signed by an authorized medical professional, including distributed meals for virtual-learning students. Since meal modifications can be costly, schools may want to consider asking families to pre-order meals and alert staff when picking up meals. Schools should take the necessary precautions for safe storage and prevent cross-contamination. Label meals so they are easily recognizable to staff and families. SFAs may want to evaluate their Special Dietary Needs policy especially if choosing to accommodate requests without a medical statement using OVS.

22. If not implementing OVS and just doing serve, how do we compensate for allergies?

When not implementing OVS, SFAs must serve all five components in their full planned portion sizes at lunch. If a student has a dietary need supported by a signed medical statement from a licensed medical practitioner, that student does not have to be served the planned menu for the day and does not need to be served all five components. Whatever is written on the medical statement becomes that student's reimbursable meal.

If a student has a dietary need that is not supported by a signed medical statement (e.g., a note from a parent), the student must still be served a reimbursable meal. If not using OVS, then the student needs to be served all five components, but substitutions could still be made as long as the meal still meets meal pattern requirements. For example, if a student has a note from a parent saying that their child is lactose intolerant, the child could be offered lactose-free milk instead of cow's milk along with the other four components of the meal.

23. How will OVS work for pre-packaged, bundled meals in the classroom?

According to the [OVS Manual](#), "if a school participates in OVS at breakfast where some or all of the components are bundled together, the operator should attempt to the extent possible to offer choices (such as a fruit basket) aside from the pre-bagged items. However, there is no requirement that all possible combinations of choices be made available to the student."

“Pre-packaged meals are allowed at all age/grade levels. Schools are encouraged to have some food components/food items with choices and/or the option to decline, such as fruit or milk. If these meals are offered as part of breakfast in the classroom, field trips, or for students leaving the campus for work study, OVS is not required, even at the senior high level.”

24. What are NSLP menu/signage display requirements in scenarios where SFAs are providing non-cafeteria meal service in classrooms and remote pick-up locations? Do menus need to be displayed at all if meal options are pre-plated/bagged? (updated 9/16/20)

Due to various COVID-19 response meal service scenarios, USDA acknowledges that posting menus at or near the beginning of serving lines may not be possible. To meet this requirement in the current circumstances, menus may be displayed at alternate locations, such as on a cart, at the pick-up location for take home meals, or online. Menus may also be posted on the school doors or in a prominent location in the school. This is applicable when meals are pre-bagged/plated. Furthermore, schools are not required to include signage at the alternate feeding locations as long as “other methods” are used to help students identify a reimbursable meal. Example: a message that states: today’s meal includes milk, meat or meat alternate, vegetable, fruit, and grain.

To assist schools, SNT has OVS and no OVS signage, available to print on our [signage webpage](#).

Claiming and Claiming Virtual Meals

25. Are SFAs required to feed virtual students?

On August 21, 2020, USDA released [USDA Memorandum SP 24-2020](#), which addresses feeding virtual students.

- If an SFA **HAS NOT** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), the SFA is subject to the congregate feeding requirements and would not be able to provide meals under NSLP/SBP to virtual students. Please note, if an SFA elects this option, students enrolled in this SFA could not receive a meal from another SFA since meals must be claimed by student eligibility.
- If the SFA **HAS** elected to participate in the [Non-congregate Feeding Waiver for SY 2020-21](#), meals must be offered to every enrolled student whether they attend virtually or in-person. Please ensure this waiver is completed to elect the non-congregate feeding waiver.

26. Are homeschool students the same as virtual learning (or e-learning) students?

Homeschool students can take up to two classes at a public school, but they are not “enrolled” in the district. They are attending the school, but are defined as 100 percent homeschooled. In Wisconsin, a student cannot be dual-enrolled amongst the three sectors – public, private and homeschool. Students who are virtually learning are enrolled in a school/district. That being said, homeschool students do not

have access to the National School Lunch and School Breakfast Programs as they are not enrolled in a school/school district that participates.

27. On the days students are in school, can we send a cold, pre-packed meal home with them for virtual learning the next day? Are we allowed to send multiple meals?

Yes. [Nationwide Waiver \(#34\) to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program](#) allows SFAs to send home multiple cold, pre-packed meals for virtual learning days. Meals sent home must be claimed on the days the meals are anticipated to be eaten.

28. If you serve meals to virtual students, can we put the breakfast and lunch together in the same bag or do we have to have the amount of time in between meals?

[Nationwide Waiver \(#34\) to Allow Meal Service Time Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program](#) allows multiple meals to be served at one time. Under normal circumstances, meals must follow meal service time requirements, which states that lunch service must be offered between 10am and 2pm. However, FNS recognizes that for the school year 2020-2021, due to the COVID-19 public health emergency, waiving the meal service time requirements will support safe access to nutritious meals. Please keep in mind that families cannot be made to take a meal they do not want. For example, if they only want lunch and not breakfast even though they are packaged together, they must be allowed to refuse one, if needed.

29. How do we deliver meals door-to-door?

Suggestions from schools include:

- Have families pre-order their meal/delivery
- Offer pickup for families in town, and route buses to families that choose that option
- Have coolers with ice packs and have the bus driver or approved staff deliver bags

30. Are we required to serve meals to students who are in quarantine because they were exposed at school? We don't normally serve meals to sick kids, why would we have to now?

SFAs that are providing meals for virtual students do not need to feed a student that is 'absent' due to COVID-19 or quarantine. However, if the SFA elected the Non-congregate feeding waiver, the SFA should continue to provide meals for students in quarantine that are still 'attending' school and doing virtual learning. SFAs are not required to deliver the meal and may want to consider special precautions when distributing meals to families in quarantine.

31. Will we be able to continue providing weekend meals to students?

Meals provided and intended to be consumed on weekends cannot be claimed under NSLP. Meals may continue to be provided for weekends if the SFA has a way of paying for those meals outside of the non-profit school foodservice account.

If your SFA participates in the CACFP At-Risk afterschool program weekend and holiday meals may be served, as approved in the CACFP contract. SFAs participating in the CACFP need to elect to participate

in the waivers that allow take-home weekend or holiday meals. Follow the instructions in the [CACFP Bulletin](#) to participate in these waivers.

32. Can SFAs serve all virtual/e-learning students out of one location or from a location that is not where they would typically be attending?

Yes. Meals may be served out of alternate locations this school year as long as you have a plan for maintaining program integrity and accountability for the meals you are serving (i.e. count and claim meals based on student eligibility).

33. May we let parents pick up all of their meals on a Monday evening of the week?

Yes. This is allowable through the USDA nationwide non-congregate and meal service time flexibility waivers. Meals must be counted and claimed on the day they are intended to be eaten.

34. Can we offer five breakfasts and five lunches on Monday to cover the whole week under NSLP/SBP?

Yes. [Nationwide Waiver \(#34\) to Allow Meal Service Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program—Extension 2](#) allows for multiple meals to be picked up at one time. This is clarified in SP 13-2020 Question #9. State Agencies may approve distribution approaches from their program operators as long as they are able to operate it effectively and efficiently. The [National Waiver \(#35\) to Allow Parents and Guardians to Pick Up Meals for Children—Extension 2](#) allows parents and guardians to pick up these meals without their children present.

Keep in mind that families cannot be made to take a meal they do not want. For example, if they only want lunch and not breakfast even though they are packaged together, they must be allowed to refuse one, if needed.

35. How do we handle free/reduced students daily when utilizing an A/B type of schedule?

[Nationwide Waiver \(#34\) to Allow Meal Service Flexibility in the National School Lunch Program, School Breakfast Program, and Child and Adult Care Food Program—Extension 2](#) allows meal service time requirements to be waived for SY 2020-21. Therefore, SFAs have the ability to send home meals if using an A/B type of schedule.

36. Do we charge virtual students based on their eligibility status?

Yes, under the NSLP and SBP, all students, whether virtual or in-person, must be counted and claimed based on their eligibility status.

37. How does the point of service work if parents pick up meals or if meals were delivered? What proof must parents provide to identify their student?

Under NSLP, meals must be counted and claimed based on eligibility for free, reduced, or paid status. Additionally, student meals must be claimed at their enrolled school even if this is not the pick-up site. Therefore, staff will need to ask for student names when distributing the meals. For proof of student, staff

must get the student name and the school he/she attends. Additionally, a student ID or PIN number may be helpful.

38. Our district has more than one school site. Do families have to pick up at the school their student(s) attend(s)? Or just counted at the school the student attends?

SFAs that have elected to implement the [Nationwide Waiver to Allow Non-Congregate Feeding](#) in the Child Nutrition Programs may permit students to pick up meals at any school within the SFA. **Meals served must be counted and claimed at the school the student is enrolled at based on eligibility for free, reduced, or paid status.** See also [USDA Memorandum SP 24-2020](#), Q4.

39. Can we charge students for a meal when they order online?

An online pre-ordering system is a great way to assist in the production of meals; however, students cannot be charged for a meal until they actually receive the meal. Additionally, if families pre-order meals and do not pick up the meals, the student's account cannot be charged.

40. Our distributor encourages multi-pack meals for virtual students. Some reduced-price students' parents are concerned about having to pay for the whole week when they only need one or two meals. Are there requirements for making meals available in increments the reduced-price students can afford? In other words, can we require 5-day multi-packs for virtual students who want to participate in food service, or do we have to allow opt-in per meal?

No. You may only count and claim meals that are served to students that would like to participate in the school meals programs. Although weekly distribution and bulk packaging are allowed, families cannot be required to take meals they do not want. Schools must have a way to allow families to order meals for only the days they wish to receive meals. If lunch and breakfast are served as a bundle, the student must be given the option to opt out of a meal they do not want.

41. Our elementary, middle, and high schools normally follow their own school attendance calendar. There are some days when the elementary schools are off, but middle and high are in session (or vice versa). Under normal times on those off school days, we would not serve meals. Now that we are 'virtual' and distributing meals from 8 locations throughout the city to all grade levels at each location (through the POS), do we have to serve elementary meals on their 'scheduled' non-attendance day? What about middle and high school "scheduled" non-attendance days?

Per [USDA Memorandum SP 24-2020](#), any day that is not considered a school day and school is "not in operation," meals may not be provided through NSLP/SBP for that school. However, if students are given work to do at home and the school considers it an instructional day, meals may be offered if the SFA has elected the Nationwide Waiver to Allow Non-congregate Feeding in the Child Nutrition Programs, the Meal Times Waiver and the Parent Pick-Up Waiver. If the school/district elects to feed those students on those non-operational days, the meals must be paid for using other funding sources and not from the non-profit school foodservice account.

42. We will be distributing one lunch and one breakfast for the next day, but are only able to run lunch through the POS at time of distribution. Can we use our lunch count (which will be by student and school) for our breakfast count?

Schools must have separate count sheets for breakfast and lunch. Since students cannot be made to take meals they do not want, they can decline the breakfast or the lunch portion of the meal. Therefore, the count could be different for breakfast and lunch.

43. Can SFAs plan for meal pick up on Saturdays?

Yes. This is allowed under the authorities provided through the Non-Congregate Feeding Waiver (#33), Meal Time Services Waiver (#34) and Parent Pick-Up Waiver (#35). This can occur any day of the week and only meals prepared for the normal school week (typically Monday-Friday) can be claimed for reimbursement.

44. A school sends home five breakfasts and five lunches on a Monday and a student is marked 'absent' on Wednesday because they are sick. Would the school still be able to claim the meals for that Wednesday since they were already given to the child? If we are sending home meals Wednesday through Friday for virtual students and there is a weather closure on Friday (for example) can we still charge those students who took the meals for Friday even though school was cancelled?

Yes. When a district provides meals for future days, the intent is the student will be learning/in attendance virtually/remotely. In good faith the food service worker provides those meals (this is the point of service) and the meals are claimed. We believe accountability for the meal is at the point of service and stops there.

45. Can a parent with five students pick up all of their meals at one location, even if only one of the five students goes to a CEP school?

Yes. If a parent of five children in a district goes to pick up meals for all five children at the elementary school, which happens to be on CEP, the parent will have to show some sort of ID. The parent will get no-cost meals for the student(s) that are enrolled in said CEP elementary school, but will have to pay for the meals (if the non-CEP building attending students are reduced or paid) for the meals for the non-CEP students. That CEP building would have to be equipped with a roster or other means for all students of non-CEP buildings so they can be ready to count and claim the meals for the students that attend non-CEP buildings should they come to the elementary school for meals.

46. We are a CEP school and usually only have to do a total meal count. In a virtual situation, do we have to verify that the meal being picked up is for a student of the district?

Yes. The SFA will need to determine a process for verifying the student is enrolled each time a meal is picked up. For example, the SFA may want to have children/parents show a student ID card, meal pick-up card, special placard on the dashboard or a letter sent to households specifically for this purpose. The site could also have a list (paper or electronic) of children enrolled in the school district and check names, student ID numbers, special codes, etc. Keep in mind, your SFA will need to ensure that overt identification isn't an issue.

47. Can a CEP school feed non-enrolled students in their area, to help feed virtual students who may not have access to meals through their enrolled school?

Under NSLP, meals are intended to feed students enrolled and cannot operate as an open site. Typically in a CEP school, a “guest or visiting” student is not a daily occurrence but rather something that happens occasionally.

Any SFA in your area that will be operating SSO or SFSP through December 31, as an open site, has the ability to feed all students ages 18 and under, there is no enrollment requirement.

When students in non-CEP schools are receiving meals at a CEP school ***within the same district***, the SFA must claim those meals based on the eligibility determination of the student at the school the students are enrolled in and regularly attending classes.

The school district will need to determine a process for verifying the student is enrolled in the school district each time they pick up meals. For example, they may want to have children/parents show a student ID card, meal pick-up card, special placard on the dashboard or a letter sent to households specifically for this purpose. Or, the site could have a list (paper or electronic) of children enrolled in the school district and check names, student ID numbers, special codes, etc.

Food Safety

48. What documentation must an SFA have if they are unable to obtain a food safety inspection during the COVID-19 emergency? **(new 9/11/20)**

Per [USDA Memorandum SP 21-2020](#), if an SFA is unable to obtain a food safety inspection because the State or local health department has suspended inspections due to the COVID-19 emergency, an SFA would need documentation (e.g., a letter or email) from the health department that these inspections have been suspended. The SFA should make every effort to receive two food safety inspections in a school year and maintain documentation of communications and requests to the local health department. This documentation will be requested during an Administrative Review to show compliance with this requirement.

49. Are there guidelines for Personal Protective Equipment (PPE)?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) June 19, 2020 states: “Schools should provide masks or cloth face coverings and require food service workers and cafeteria monitors to wear them while performing their duties.”

50. Can a food service employee plate the salad bar for students?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) June 19, 2020 states: “Remove salad bars or other opportunities for self-service or “high-touch” touch points.” This guidance does not address a food service employee plating foods for students. Consider the amount of time it takes for a food service employee to plate the salad bar versus having salads pre-portioned with varying toppings available on the serving line.

51. Are districts considering bag type lunches for classrooms? Or hot meals? And how do you keep food at temperature for classroom consumption?

Each SFA has the ability to determine if they want to serve cold or hot meals in the classroom. Serving lunches in the classroom can be similar to serving breakfast in the classroom. For ideas on what to consider, refer to the [UW-Extension Breakfast in the Classroom Toolkit](#), specifically the sections within Developing a Plan: What are service options, How will the classroom set up and clean up work, Are there equipment, supply, preparation and storage needs, and Are there food safety concerns. If you have not served meals in the classroom previously, a standard of operation (SOP) is required as part of your food safety plan.

52. What is the guidance for sneeze guards?

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) June 19, 2020 states: “Installing physical barriers, such as sneeze guards and partitions, particularly in areas where it is difficult for individuals to remain at least 6 feet apart. Consider installing a plexi-glass barrier in front of work service workers and cashiers.”

53. How do we keep students social distanced through the lunch line?

Health and safety regulations and recommendations can vary by county. SFAs may want to contact their local health department for guidance on serving meals safely. In addition, consider working with other school staff to educate children on safe ways to slow the spread of COVID-19 including social distancing, proper hand washing, and avoid touching face, nose, or eyes.

Examples of ways to create physical distance between students may include:

- Physical guides such as floor decals, colored tape, or signs to indicate where students should sit or stand.
- Have students sit in a zigzag pattern so they cannot sit opposite or next to each other.
- Disallow anyone to sit on the end seat next to a high-traffic area.
- Create one entrance and one exit for a one-way traffic flow.

Other ways to slow the spread of COVID-19 may include:

- Create signs, including visual cues, about stopping the spread of COVID-19 and post in highly-visible areas of the cafeteria such as the entrance door or lunch tables.
- Eliminate self-service including salad bars.
- Stagger the use of the cafeteria to allow for time to clean and sanitize highly-touched areas between groups.
- Disallow students to pass or share items including food.
- Have students wash their hands immediately before entering the cafeteria.
- Have hand sanitizer available at the beginning of the serving line and in the cafeteria.

54. When sending meals home with students, what do we need to consider related to food safety?

Sending food home with students can cause concern, especially because the meals will likely contain time-temperature control for safety (TCS) foods. If meals will be sent home with students, consider a pre-ordering system so families are aware of what food should be coming home and when. Additionally, placing food items in a separate bag instead of in backpacks may help draw attention to the food so it can be stored safely and in a timely manner, such as immediately into the freezer or refrigerator. Extra

communication to families on days food will be going home with students may also help lower concerns. Alternatively, parents could pick up meals on behalf of their students at designated times and locations. You may want to speak with your legal counsel regarding food safety liability.

55. Does everything we serve need to be pre-packaged? Do we need to serve meals using only disposable foodservice items?

No. Meals do not need to be pre-packaged and use of disposables is not required, though these are both options. School foodservice professionals can serve food to students through a line in the cafeteria. However, it is recommended that self-service areas be removed and that staff hold responsibility for plating all meals.

56. Guidance from the CDC only mentions washing non-disposable dishes with dish soap and hot water (or in a dishwasher). If non-disposable dishes are washed by hand, do we still need to sanitize them?

Yes. All hand washed non-disposable dishes also need to be sanitized, as they normally are when utilizing a three-compartment sink for manual dishwashing. Schools that participate in NSLP must follow the Wisconsin Food Code, including the requirements regarding sanitizing food-contact surfaces. Please review the [Wisconsin Food Code Fact Sheet: Washing and Sanitizing Food Contact Surfaces](#) for a reminder on these requirements.

57. How do we accommodate for Temperature Control for Safety (TCS) foods during pick up?

TCS foods must be handled as they normally would: through refrigeration or by heating. Cold foods must be kept at 41 degrees or lower and hot foods must be maintained at 135 degrees or above.

58. Can we do bagged lunches for the first two months of school due to the pandemic?

Yes, this is allowable.

59. If we are serving meals in the cafeteria, do we need to utilize plexi-glass?

This is not a DPI requirement, but highly recommended. Check with your local sanitarian for guidance.

60. If we are serving meals in the cafeteria, how do we handle milk cartons from the cooler?

DPI recommends distributing milk cartons on the line by a trained staff member using gloves.

61. When offering meals, can we consolidate from 12 sites down to 6 so we have fewer buildings to keep sanitized?

Yes, school districts may consolidate the number of sites that offer meals. They must ensure that such consolidations will not be restrictive and that all households and their children from the 6 closed sites will have access to the meal service at the 6 operating sites.

SFA Waivers

62. Do we fill out the waivers as needed or just as we are planning to start? Where can the waivers for SY 2020-21 be found?

The following waiver forms can be found on the [School Meals Program COVID webpage](#):

- [Waiver to Allow Non-congregate Feeding](#) (required to feed virtual students)
- [Waiver to Allow Meal Service Time Flexibility](#)
- [Waiver to Allow Parents and Guardians to Pick Up Meals](#)
- [Waiver for Meal Pattern Flexibility](#) (only if needed)
- [Waiver to Allow Offer versus Serve Flexibility for Senior High Schools](#)

Complete these waivers when you know this is what your school or district plans to implement. The first four listed above do **not** require approval from DPI, however please fill them out for reporting purposes. The meal pattern flexibility waiver **does** require approval from the DPI SNT.

63. If we are in a joint agreement, do we still need to complete waiver Meal Pattern Flexibility Waiver #36?

Yes. SFAs need to know/understand what meals are served to their students. Therefore, they need to be responsible for filling out the form AND receiving approval from DPI. Each separate SFA must have a waiver, so the SFA providing the meals should work with the joint schools to get the waiver submitted.

DPI Requirements

64. If we do not have in-person student/family registration, how do we distribute food service applications?

The Household Application Free and Reduced-Price School Meals, Parent letter, and instructions can be mailed or emailed to all households. It could also be part of online registration, if applicable at your SFA. In addition, your SFA may want to consider using the free online application available through the School Nutrition Accountability Software (SNACS). Contact DPISNACSSupport@dpi.wi.gov if interested in learning more about this opportunity.

65. What about the Point of Sale (POS) in the contract with so much unknown at this point? Can we change it as needed?

Yes, the school nutrition contract may be modified throughout the year, as needed.

66. For those of us going into the last year of our FSMC contract, will we be able to extend 1 more year and not have to go to RFP this next school year?

DPI has already reached out to schools in their last year of the FSMC contract to discuss options for SY 2020-21. The same process will occur, if applicable for SY 2021-22; DPI will reach out to those schools in their last year of the FSMC contract to discuss options.

67. If meals are not being distributed from all school sites when we are 100% virtual- how should we complete the contract?

All school sites should be listed in your 2020-21 SY School Nutrition Contract as usual. The sites listed on the contract should always match the WI School Directory. Meals will still be claimed at the school the student is enrolled in and must be included on the contract.

Financial Management

68. Is the purchase of personal protective equipment or other supplies that are intended to prevent or reduce the spread of COVID-19 an allowable cost?

Yes. Personal protective equipment (gloves and face masks) as well as cleaning and sanitary supplies are allowable costs during the current public health emergency, provided that such purchases are made in support of the Child Nutrition Program operations.

69. Is reimbursement for mileage and meal delivery costs (staff time/benefits/gas/mileage) an allowable food service expense?

Yes, as long as the delivery costs are for food service purposes. Make sure the time is tracked specifically for this food service function and ensure you practice safe food handling during delivery. The food service account cannot pay for other tasks/deliveries unrelated to food service.

70. What funding is available for meal delivery?

There is no additional reimbursement for home delivery or mobile meals delivery, but related expenses, such as postage or delivery service fees, would be considered an allowable cost under the SFSP or SSO. Delivery costs could also be paid with non-program funds such as State or local funds, or private donations.

71. Are there established federal and/or state rates that public school districts must use when reimbursing staff for mileage?

Most businesses use the maximum [reimbursement rates](#) set by the IRS. Many districts choose to use this rate also but they can set whatever rate they like as long as it is in approved district policies.

72. What are schools thinking about for a la carte sales or extras? For some schools this generates much needed revenue. From a budget standpoint this will create a huge loss in the food service programs.

The SNT recommends discussing a la carte and extras with school administration to determine the best course of action. If implementing, consider pre-packaging or unitizing a la carte items or extras to ensure

food safety. If SFAs have ideas or best practices on how to incorporate a la carte items or extras during COVID-19, please share with the SNT.

73. Will the participation number from this school year negatively affect our severe need breakfasts in the future?

Severe Need Breakfast qualification is based on the number of lunches served in the second previous year. If the number of lunches served in SY 2019-20 was reduced due to COVID-19, this could have an impact on qualification in SY 2021-22. The SNT will discuss this further with USDA to see if any flexibility will be offered.

74. Will the reimbursement rates be increased to offset increased costs?

USDA has released the [reimbursement rates](#) for SY 2020-21.

75. Do I have to raise prices for SY 2020-21 as indicated in the Paid Lunch Equity (PLE) Tool?

If an SFA had a **positive** balance in December 2019 and wants to lower their paid lunch price they can do that, but USDA has indicated that non-Federal funds must be used to make up the difference. If an SFA had a **negative** balance in December 2019 and doesn't want to raise their prices that is a different situation, as PLE regulations require the increase and the SFA will fall further behind. Currently the paid lunch prices must be based on the SY 2020-21 PLE tool requirements. The DPI SNT has submitted a waiver to USDA for the PLE requirements for SY 2020-21.

76. Can time spent working on Pandemic EBT (P-EBT) over the summer be charged to the non-profit school foodservice account?

Yes, this is an allowable cost to the non-profit school foodservice account.

Miscellaneous

77. If we need to hire more substitute cooks, will training requirements be waived?

Having school nutrition staff that are trained, with the knowledge required to perform their jobs, is essential for ensuring food safety and meeting program requirements. We recommend using the training checklist on the [professional standards webpage](#) to identify training topics and needs specific to these staff. If you are having difficulty getting all training hours completed within the two-year timeframe, contact the SNT at dpifns@dpi.wi.gov.

78. Can there be a waiver on water availability? Students may be eating in the classroom and they are shutting off all drinking fountains.

Per [USDA Memorandum SP 24-2020](#), during the COVID-19 pandemic, the potable water requirement applies when lunch is served in the classroom. Potable water is not required for the SBP or when meals

are provided to students who are learning virtually and who are not eating lunch at school. The Afterschool Snack program falls under NSLP and also requires potable water, when this program is operated in a school or community building.

The DPI SNT has submitted a statewide waiver requesting USDA to waive the requirement to provide potable water without restriction to children at no charge in the place(s) where lunches are served during the meal service.

79. If we are serving meals to virtual students, where do we need to post “And Justice for All” posters? What about in the classrooms?

Per [USDA Memorandum SP 14-2020](#), when meals are served virtually, the *And Justice for All (AJFA)* poster must be prominently displayed at all facilities and locations that distribute meals. Meals delivered from stationary vans or buses should display the AJFA poster. For vehicles making door-to-door drop deliveries at homes and businesses, the AJFA poster does not need to be displayed.

Per [USDA Memorandum SP 24-2020](#), the AJFA poster does not need to be displayed in each classroom, but should be prominently displayed throughout the school in an area that is frequently visited by parents and students.

80. How is an unanticipated school closure defined by USDA?

Per [USDA Memorandum SP 24-2020](#), if instruction is not provided to children as planned, an unanticipated school closure occurs. When school buildings are closed, if a school plans to offer virtual learning or a mix of in-person classes and virtual learning, any meals provided to children must be claimed through NSLP or SBP. During the period when no instruction is being provided, an unexpected school closure has occurred and the Seamless Summer Option (SSO) or Summer Food Service Program (SFSP) may be operated. Once the school closure ends, the school must return to providing meals through NSLP/SBP. Please contact the DPI School Nutrition Team if your SFA has an unanticipated school closure to determine meal options. All SSO and SFSP program requirements would apply, including area eligibility for SY 2020-21.

81. Will the presentation and slides for the stakeholder calls be shared?

Recordings for stakeholder calls can be found at the join link provided for the call you attended. These links and slides are posted on the DPI SNT’s [School Meals COVID-19 webpage](#) under the Stakeholder Calls heading.

82. Any suggestions of how to recruit extra staff? We have 95 employees and recruiting, training, and scheduling another large group that will be temporary if needed. Many of the changes will be labor intensive while we experience a decrease in revenue.

Suggestions include checking with local restaurants and catering services to inquire if laid-off employees may be interested. Additionally, parents of students in the district may be interested in temporary employment. SFAs may also use volunteers to help lessen extra costs. All staff, including volunteers, must have civil rights training and any additional training associated with their job duties.

83. What if we close for two weeks due to an outbreak of COVID-19 and come back?

If students were in the building for instruction and the building had to close for two weeks due to an outbreak of COVID-19, and students are now doing virtual or e-learning, meals should be served through the NSLP. USDA had provided nationwide non-congregate meal and meal time flexibility, and parent/guardian pick up waivers to allow for students to continue to be fed.

84. Will open campus or foods from home be affected?

Although this is a school district decision, the [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) June 19, 2020 states: "Consider closing the school campus at lunch time so that students are not able to leave school and risk potential exposure in the community." In addition, districts may want to develop a policy that disallows students from bringing shared birthday treats or other shared snacks.

85. Can we use the Summer Food Service Program (SFSP) on Labor Day or other days that were actually non-student attendance days?

No, this is not allowed.

86. Can we provide meals to students on non-student attendance days (e.g. Labor day)?

Meals provided on holidays cannot be claimed under NSLP. If your SFA would like to provide meals to students on non-school days, such as holidays or scheduled out-of-school days, they can do so but the cost associated with providing these meals must be allocated to a funding source other than the non-profit school foodservice account. If your SFA participates in the CACFP At-Risk afterschool program weekend and holiday meals may be served, as approved in the CACFP contract. SFAs participating in the CACFP need to elect to participate in the waivers that allow take-home weekend or holiday meals. Follow the instructions in the [July CACFP Bulletin](#) to participate in these waivers.

Other Programs

87. How does the Afterschool Snack Program work for students learning virtually? Do we have to feed those in-person as well as those virtual?

Schools have the option of participating in the USDA Afterschool Snack Program. If a school elects to operate the program, all students enrolled in the school must have the ability to participate, both in-person and students learning virtually.

Per [USDA Memorandum SP 24-2020](#), USDA is not providing a waiver for the enrichment activity for the Afterschool Snack Program. When providing non-congregate meals, SFAs must provide an education or enrichment activity for each day the snack is served. Enrichment activities may be offered in a virtual manner and may include online homework assistance, activity packets, games, books or other e-learning activities. The afterschool snack must continue to follow the meal pattern requirements and may only be provided and claimed for students enrolled in the Afterschool Snack Program.

88. Are CACFP At-Risk Afterschool Programs required to provide an education or enrichment activity when providing non-congregate meals?

Yes. CACFP At-Risk afterschool programs providing non-congregate meals must provide an education or enrichment activity for each day the meal/snack is served. Although children are not required to participate in or complete the activity in order to receive an afterschool meal or snack, the afterschool care center must offer the activity.

When meals are served using the non-congregate and parent pick-up waivers, these activities may be conducted virtually or in other non-congregate ways. For example, programs may offer online homework assistance, activity packets, electronic games and books, or other e-learning activities for the participants to complete at home. Team Nutrition offers a variety of online games, books, and nutrition education activities: [Digital Nutrition Resources](#).

89. Are CACFP At-Risk Afterschool Programs required to maintain attendance records when providing non-congregate meals?

At-risk afterschool programs who choose to provide non-congregate meals only need to maintain daily attendance records for participants who physically attend the program (sign-in sheets or, with state agency approval, other methods which result in accurate recording of daily attendance). Those at-risk programs that do not have children actually in attendance do not need to maintain daily attendance records. However, the program must maintain accountability and program integrity, including processes to ensure meals are provided to participants, and that they do not receive duplicate meals from other child nutrition programs (i.e. NSLP, SBP). At-risk afterschool programs must still maintain daily meal counts.

90. Are take-home weekend meals allowed in the CACFP At-Risk afterschool program?

Yes, the CACFP At-Risk afterschool program allows for a maximum of one snack and one meal per child per day. Meals must be served after school except on weekends and holidays, when meals may be served at any time of the day, as approved in the CACFP contract. Agencies participating in CACFP need to elect to participate in the waivers that allow take-home meals. Follow the instructions in the [July CACFP Bulletin](#) to participate in these waivers.

91. Does the WSDMP have to be served to virtual students? (updated 9/11/20)

For SY 2020-21, SFAs are allowed to serve milk to students under the WSDMP in a non-congregate manner, at a time that works for the SFA and households (depending on learning model), and parent/guardian pick-up is allowed. All other requirements of this program remain in effect. For more information, check out the [WSDMP webpage](#).

State statute requires milk to be served each day school is in session for eligible students. There is flexibility offered to SFAs who cannot meet this requirement when students are learning virtually. How SFAs apply for this flexibility is dependent on whether your SFA is public or private.

Proposed Plan (private schools only): Private SFAs must provide the DPI SNT with a [proposed plan](#) of how they will be serving the WSDMP this year. If students are not in school buildings, this plan lets the DPI SNT know to which students you will be serving milk. You can claim only for the milk that was served depending on the specified plan and whether or not school was considered "in session" if students were not in the building.

Waiver (public schools only): Public SFAs may now request a [waiver](#) of WSDMP state statutes that require milk to be served every day. If students are not in school buildings, this waiver allows you to not have to serve milk. However, if you do serve milk during the school year (either in the building or when students are in virtual learning), you can claim for that milk even if you did not serve every day school was in session. Please note, since WSDMP is under state statute, before requesting a waiver, the school board needs to hold a public hearing in the school district on the request.

92. Can the Special Milk Program (SMP) operate when schools are operating virtually? (updated 9/11/20)

The DPI SNT requested and was granted a waiver from USDA to waive the SMP requirement that milk be served and consumed onsite. This waiver allows milk to be picked-up by participants and taken off-site. If your SFA is participating in this program and you wish to offer milk in a non-congregate way, you must complete the [waiver](#).

As a reminder, the SMP program is intended to serve students who do not have access to a breakfast or lunch meal service. If this has changed due to virtual meal pick up options, a student who does not have access while attending school in the building may not qualify for SMP while they have access to meals while school is virtual.

93. May FFVP snack be served out of non-elementary school sites during school closures related to COVID-19?

Yes, Wisconsin received a waiver from USDA that allows the State agency to approve SFAs participating in the FFVP to serve FFVP foods at sites that are not elementary schools. Shortly after schools are notified of their SY 2020-21 grant status, an email will be sent to awarded schools with a link to the waiver. SFAs must complete this survey in order to utilize this waiver.

94. Can the FFVP snack be served to non-elementary students?

No, the FFVP snack may only be served to elementary students enrolled at an awarded FFVP school.

95. May parents pick up the FFVP snack for their students during school closures related to COVID-19?

Yes, Wisconsin received a waiver from USDA that allows the State agency to approve SFAs participating in the FFVP to distribute FFVP foods to a parent or guardian to take home to their child/children. Shortly after schools are notified of their SY 2020-21 grant status, an email will be sent to awarded schools with a link to the waiver. SFAs must complete this survey in order to utilize this waiver.

96. What if during a school closure, an elementary school that was awarded the FFVP grant isn't operating as a meal distribution site? Can we use that school's funds to distribute the FFVP snack at other sites?

Yes. FFVP funds from an elementary school that is not a distribution site may be used to serve snacks at a distribution site. See the earlier answer for more information about this waiver option.

For example, if Schools A and B participate in the FFVP but you are only serving meals out of Schools C and D, you may use funds from Schools A and B to distribute FFVP snacks at Schools C and D to students from A and B.

When submitting claims, please continue to claim for each site that participates in the program, even if FFVP snack is being served out of a different site. Grant funds cannot be transferred between schools.

97. FFVP grant awards are being sent out later than usual this year. Do we still have to start serving FFVP during the first full week of school?

The requirement for schools to begin serving FFVP during the first full week of school remains the same. However, we recognize that due to the delay of distribution SY20-21 FFVP grant awards, it may not be feasible for schools to begin serving during the first full week of school. If awarded the grant, we encourage you to get the program running as soon as possible and keep in mind that any unused allocation A funds will have to be returned to USDA if not spent by September 30, 2020.

USDA Foods and Procurement

98. Who do we contact with USDA Foods questions?

Contact the USDA Foods team at DPISNUSDAFoods@dpi.wi.gov or call (608) 266-3615.

99. What if our school does not participate in USDA Foods Program and would be interested in receiving USDA Foods?

If your school does not participate in the USDA Foods Program and needs additional foods to serve meals please contact the [USDA Foods team](#) to discuss options.

100. Will fewer meals served in SY 2019-20 and SY 2020-21 affect future USDA Foods entitlement dollars? (updated 9/18/20)

[Families First Coronavirus Response Act \(FFCRA\) Opt-In Waiver for School Year 2020-2021 National School Lunch Program USDA Foods Entitlement Calculations](#)

Pursuant to section 2202(a) of the FFCRA, Food and Nutrition Service (FNS) is establishing a nationwide opt-in waiver to help minimize the impact of coronavirus related school closures on USDA Foods entitlement calculations.

Due to widespread school closures resulting from COVID-19, there is a potential that reimbursable lunch counts will be reduced in Wisconsin. These reductions may result in decreases to the USDA Foods entitlement available to our state for SY 2020-21, which could lead to less USDA Foods provided in school meals. Therefore, FNS waives Section 6(c)(1)(C) of the National School Lunch Act (NSLA), and our state may elect to opt-in to this waiver and forego the annual **entitlement** adjustment process in **October** 2020.

The Wisconsin DPI has elected to opt-in to this waiver. **No action is required on the part of the SFA.** As a result of **the WI DPI** opting into this waiver, **the following will occur for all WI SFAs participating in USDA Foods:**

- The preliminary SY 2020-21 entitlement level, based on SY 2018-19 lunch counts, which state agencies were assigned in January 2020 for placing SY 2020-21 orders, will be the final entitlement value assigned for SY 2020-21. **The November 2020 price file will still be updated as normal.**

- In **October** 2021, **entitlement** adjustment is planned to occur as normal. In other words, SY 2021-22 USDA Foods entitlement will reflect lunches served in SY 2020-21.

101. How do I manage my deliveries and inventory?

Please refer to the DPI USDA Foods [Deliveries and Inventory Management Information](#). Suggestions from schools include:

- Repackaging USDA Foods items into portion cups
- Planning menu with emphasis on using available USDA Foods; eliminating some non-USDA Foods from menu
- Planning to use USDA direct diversion pounds on every entree item
- Simplifying cycle menus
- Staying flexible on menu to use the USDA Foods available; planning menus on a weekly basis instead of the monthly; keeping menus subject to change
- Planning to order another reach-in freezer

102. For managing inventory, are we going to be able to carry over pounds later than the new September 30, 2020 deadline, since we weren't able to use as much as we could have in spring with COVID?

Please refer to the current [Inventory Carryover and Sweep Policy](#).

103. What is the carry over deadline?

There are a few deadlines related to carryover of direct diversion and cheese processing products, please refer to the current [Inventory Carryover and Sweep Policy](#). There is no carryover for DOD Fresh Produce Program or USDA Foods Direct Delivery (Brown Box).

104. Is there any kind of official system or policy to donate to other school districts?

Yes. Please refer to [Deliveries and Inventory Management Information](#) under Transfer or Donate Inventory. Be sure to follow the [Transfer USDA Foods Inventory Guidance](#).

105. Is there a minimum case count that must be ordered before you can sign on with a current Commercial Distributor?

Sometimes. Please contact commercial distributors as each one is different depending on the size of your school, location in state, velocity of product orders, etc. To get started, refer to the [DPI Commercial Distribution webpage](#). Stay tuned on this webpage for a list of prime vendors working in Wisconsin. Contact the [DPI Procurement Team](#) with questions about conducting proper procurement.

Responses from schools include:

- Commercial distribution gives you the ability to space out delivery of your USDA Foods order throughout the month instead of getting everything all at once. This helps if you have limited storage.
- Commercial delivery and menu planning really work well together.
- Our commercial distributor sends us a monthly spreadsheet of what our USDA foods order is and we choose what and how much we want each week.

- Our commercial distributor helps us to find other schools to transfer and deliver the products that we cannot use at this time.
- Our commercial distributor has been fantastic for us. All USDA Foods (Brown Box) are available on demand, but we need to take delivery of all by the end of the school year.
- Our minimum is 10 cases and \$500.

106. Is Direct Diversion Processing the same as Delivery by a Commercial Distributor?

No. Direct Diversion is an option at the time of placing your annual order. Direct diversion processing is a processing option where School Food Authorities (SFAs) choose bulk USDA Foods and indicate the number of pounds and which processor to divert each bulk USDA Foods on behalf of their SFA. These processed products will be delivered via your commercial distributor.

Commercial distribution is a delivery option for USDA Foods. Schools have a choice between [State delivery \(a one time per month drop\) or commercial distribution](#). The deadline for schools to change their delivery option for the following school year is March.

107. Does the Commercial Distributor only deliver commodity products?

No. Commercial Distributors (Prime Vendor) will deliver Direct Diversion, USDA Direct Delivery (Brown Box), and your commercial products.

Commercial Distribution is a delivery option for those SFAs choosing to have their USDA Foods delivered by a commercial distributor. For example, SFAs may choose to have ABC Trucking deliver their USDA Foods. SFAs may also choose the Direct Diversion Processing option. In this option, SFAs would be selecting the processors and committing bulk USDA Foods to these processors.

108. Can you explain the difference between brown box and direct diversion?

SFAs have some options for drawing down, or “spending” their annual allotted entitlement.

- USDA Foods Direct Delivery (Brown Box) are finished products available to all SFAs participating in USDA Foods.
- If your SFA does not participate in State Processing, direct diversion is an option where SFAs choose bulk USDA Foods and indicate the number of pounds and which processor to divert each bulk USDA Foods on behalf of their SFA.
- If your SFA does not participate in Direct Diversion, your SFA can order State Processed Products.
- All SFAs can participate in the USDA DOD Fresh Produce program.

109. Is there specific documentation for any donations, such as required language?

There is not a required form that must be used to document the transfer or donation of inventory. However, WI USDA Foods created an *optional* [Transfer or Donation Documentation form](#), released on 9/2/2020 to help guide SFAs through the process. Documentation can be formal or informal, either hand written or electronic. Whichever way your agency chooses to keep record, be sure to retain for 3 years plus the current school year. Documentation must include a description of the items, quantity,

date of transaction, contact names, if fees were recovered, and if there was a swap of items. The original recipient agency, child nutrition program, or charitable organization may be subject to audit.

110. Do we know when we can view our USDA Foods (commodities) in the USDA Foods Ordering System?

The USDA Foods are now available for viewing on the “Surveys” tab of your USDA Foods ordering account. Please follow the [How to Review Your Survey instructions](#). After the 15th of each month between September and April, you should login to the Ordering System to view any delays, shortages, or cancellations on the USDA Foods Message Board. Then click on the “Order” tab to view the items to be delivered next month. Click on the “Invoicing” tab to view handling, administrative fees, and delivery fees, if applicable.

111. Are we supposed to log in to Wisconsin USDA Foods Ordering System from the 1st through the 10th of each month to check availability of additional entitlement no charge/bonus products for the upcoming month? Does this have to be done?

SFAs are not required to check for surplus or fair share opportunities, but it is strongly encouraged. Taking advantage of these USDA Foods opportunities is a great way to control your food costs and maximize your entitlement value. Fair share and surplus USDA Foods products can be offered as entitlement needed, entitlement no cost, or bonus. When available, surplus products are available for ordering from the 1st to the 10th of the month on a first come first serve basis. When fair share products are available, DPI will send an email notification (fair share opportunities, when available are from the 3rd to the 10th of the month).

112. If we are able to order fair share products, when will they be delivered?

For fair share and /or surplus items that are taken during the 1st to the 10th of a month, those products will be included with the next month’s order and delivered. For example if you order fair share products on August 6, they will be delivered with September orders.

113. For the surplus, is that considered transferring, or are there charges associated with it?

USDA Foods, including surplus foods, are not free. Costs associated with ordering USDA Foods may include: storage, administrative, delivery (if using state-delivery option), and processing fees (if you order state-processed food which starts with a “C” product code). Your SFA is responsible for USDA Foods fees, and fees will be automatically deducted from your National School Lunch reimbursement claim.

If your school is choosing to transfer or donate USDA Foods products, whether the product is at the state warehouse, your commercial distributor, or at your school, your SFA is still responsible for DPI fees. Although your SFA can negotiate fees based on the cost to transfer products, SFAs are not allowed to charge for entitlement value or make a profit in transfer or donation of USDA Foods.

114. Can a school accept food donations and utilize it as part of a reimbursable meal?

Schools may accept and use donated food from other schools that participate in the USDA Child Nutrition Programs and have extra food they want to share, including USDA Foods. This food may be used as part of a reimbursable meal.

Schools may also be able to accept food donations from other sources for use in reimbursable meals, however specific restrictions and considerations apply. Schools must procure all food used in the Child Nutrition Programs from approved sources, as defined by the Wisconsin Food Code. Schools should contact their local regulatory authority or sanitarian for assistance in determining if a prospective donor and their food products are permissible to accept. Please note that the following are a few examples of items that **cannot** be accepted:

- Food prepared in a private home, including, but not limited to, home-canned items. Per the Wisconsin Food Code, these types of items cannot be used or offered for consumption in a food establishment.
- Salvaged foods, such as those from a food pantry or food bank.
- Packaged foods that are not properly labeled in accordance with the applicable labeling laws.

Schools should keep in mind that donated items must be held to the same food safety standards as purchased products. Before accepting donated products, schools should inquire about freshness, shelf life, safe handling procedures, and required storage temperatures. Supporting documentation, including written specifications for time/temperature control for safety (TCS) foods, as well as written letters from suppliers indicating they follow a HACCP plan, should be maintained. The school should also document all donated items received by recording a description of the item(s), quantity, date of transaction, and name of donor school or other agency. The donor should retain the same documentation.

If schools do not wish to accept food donations or are unable to do so, interested donors can be directed to other local organizations (such as food pantries, the Red Cross, etc.) that may be able to accept the donations.

Please contact the [DPI SNT food safety specialist](#) with further questions.

115. Can the SFA package and distribute frozen food items (e.g. precooked chicken nuggets) for families to heat at home as part of the reimbursable meals?

Yes, if specific measures are taken. These food items must meet the applicable NSLP/SBP meal pattern requirements in order to be served as part of the reimbursable meal. Additionally, SFAs should ensure that these types of food items are distributed with clear cooking instructions for the household to follow, including directions to heat the food to an internal temperature of 165 degrees F before consuming. For frozen items, the SFA should also communicate safe storage guidelines if the foods will not be prepared and eaten immediately. Safe storage guidelines for items intended to be heated at home should advise that the foods be held at 41 degrees F or below (or kept frozen, if applicable) until used. SFAs should consider the kitchen equipment and food preparation requirements involved in the meals provided, as households may be limited in these respects. Please reference the [USDA Memorandum SP 13-2020](#) for further guidance.

If SFAs choose to include frozen food items in the meals, the items should be labeled as “fully cooked,” “precooked,” or “ready-to-eat” on the manufacturer’s packaging. SFAs should not distribute any raw animal-based time/temperature control for safety (TCS) food items, such as raw chicken, raw eggs, raw beef, etc. There are many frozen [State Processed Products](#) available that could be incorporated into reimbursable meals.

If you are unsure if a frozen item may be considered “fully cooked,” “precooked,” or “ready-to-eat,” please contact your local regulatory authority and/or sanitarian to discuss your specific question and obtain additional guidance. If you have questions about a state processed product on the list above, please contact a DPI USDA Foods team member.

116. It is becoming difficult for my agency to source disposable portion controlled food storage containers, like clamshells. What other options do I have to package meals?

SFAs may have to adapt and utilize alternative food storage containers not typically utilized or procured. Suggestions include, but are not limited to: aluminum foil, portion cups with lids, paper boats with plastic wrap, wax paper to wrap a sandwich, ziploc bags, styrofoam cups with lids, or even banana leaves. Banana leaves are available frozen at most grocery stores.

It is possible that other schools, grocery stores, college dining facilities, or local restaurants will still have items like this to purchase. When making unplanned purchases, follow the below guidance on Emergency Procurement.

Emergency Procurement

2 CFR 200 allows for a type of procurement called an “Emergency Procurement”. This means, if necessary, school food service staff can conduct emergency purchases to continue uninterrupted food service using noncompetitive procurement methods. This type of procurement or purchase is short term in duration. Records must be kept to track these types of purchases. For example, a log of all such purchases must be maintained and reviewed monthly by the school food service department. The log of emergency purchases should show:

- Contractor/Supplier Name
- Contractor/Supplier primary contact information and address
- Contractor/Supplier name of person supplying pricing
- Purchase amount/contract value
- Description of product and/or service being purchased/contracted
- If applicable, duration of contract (contract term)
- Reason for emergency

117. How many bids do we need to put in for milk please?

At least two bids are required, three are recommended.