

# 2021-22 School Nutrition Programs

## Q&A: Serving School Meals Under the Seamless Summer Option During the COVID-19 Pandemic

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This document contains frequently asked questions and answers related to serving school meals under the SSO during COVID-19 in the school year (SY) 2021-22.

Click on a heading topic under the Table of Contents below to find information about a specific area. You can also use *Control F* to search this document. If your question and answer is not featured within this document, please contact [dpifns@dpi.wi.gov](mailto:dpifns@dpi.wi.gov).

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## School Meal Service Options for the 2021-22 School Year through June 30, 2022

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### 1. What options do school food authorities (SFAs) have for providing school meals in SY 2021-22?

#### Option 1: Seamless Summer Option (SSO)

On April 20, 2021, USDA released [COVID-19: Child Nutrition Response #85](#), which allows the SSO to operate during the regular school year, effective July 1, 2021, through June 30, 2022. All schools or districts may participate in the SSO, without meeting traditional area eligibility requirements.

Under SSO, all National School Lunch (NSLP), School Breakfast (SBP) and/or Afterschool Snack (ASP) requirements still apply, but meals are provided at no charge to students. The maximum number of meals that may be offered under the SSO is two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. Per [COVID-19: Child Nutrition Response #86](#), SFAs will claim all SSO meals and/or snacks at the higher Summer Food Service Program (SFSP) reimbursement rate.

The SSO facilitates a safer meal service by eliminating the need to collect meal payments and speeds up service of meals, thereby reducing contact and potential exposure to COVID-19. It also meets the Centers for Disease Control and Prevention recommendations for safe school meal service, which include serving meals outdoors or in classrooms. All SFAs are strongly encouraged to participate in the SSO for SY 2021-22. This includes Residential Child Care Institutions (RCCIs) and SFAs participating in the Community Eligibility Provision (CEP) at the 100% free claiming percentage.

See the [SSO Webpage](#) for more information and resources on this program.

#### Option 2: National School Lunch Program

SFAs may provide meals to students through the NSLP, SBP and/or ASP, as usual. All program requirements still apply. Students would be charged, and meals claimed based on the student's eligibility status and claimed at established NSLP, SBP and ASP SY 2021-22 reimbursement rates, not the higher SFSP rates. These sites may not operate open sites.

#### How to Apply:

All schools or districts should complete the [Program Operations Application](#) for SY 2021-22 to elect either SSO or NSLP. This application also allows schools or districts to elect any waivers needed.

### 2. The SSO regulations only allow schools with 50% or more of their enrolled students certified as eligible for free and reduced to qualify. Can schools that have less than 50% of their enrolled students certified as free or reduced participate in SSO?

Yes, per [SP 15-2021, Q7](#), Child Nutrition Response #85 allows any school, regardless of its location, to provide free meals to all children through the SSO beginning on July 1, 2021.

### 3. If our SFA elects to operate the SSO, is there a requirement to provide meals to children in our community?

Each SSO site may choose one of the following site types:

- a. **Open** - all children eat free in communities, age 18 and under. Schools and non-school sites can elect this option. With this option, meals **must** be made available to the community for children 18 and under.
- b. **Restricted Open** - sites that meet the open site criteria, explained above, but are later restricted for safety, control, or security reasons. Serves children aged 18 and under. Schools and non-school sites can elect this option.

**NOTE:** An example might be making meals available to other household members (age 18 and under) of enrolled students. Schools could provide meals one day a week at a school or community site and provide a week's worth of meals at once for community participants. This may help schools meet the open requirement but who do not have the ability to do this daily, particularly when students are back in buildings.

- c. **Closed Enrolled** - SFAs operating SSO during the regular school year may decide to operate closed enrolled sites that limit participation to only students enrolled at the school site. ([SP 16-2021, Q3](#))

**4. Are SFAs required to make meals available to students learning virtually?** ([SP 25-2020, Q11](#))

It depends on whether the non-congregate waiver has been elected. SFAs that have not elected the non-congregate waiver would only be responsible for feeding students that are eating in a congregate meal service location, such as a school building. However, schools that have elected to implement the non-congregate waiver must offer the same meals to every enrolled student whether they attend virtually or in-person. SFAs are encouraged to make meal service available to all enrolled students whenever possible, or direct virtual students to other meal service locations in the community.

**5. Are Residential Child Care Institutions (RCCIs) allowed to elect the SSO?**

Per [SP 16-2021, Q5](#), all SFAs, including RCCIs, have the option to elect SSO.

**6. May schools that offer only virtual classes and that do not have a building from which to offer in-person classes qualify as a site under SSO?** ([SP 24-2020, Q2](#))

FNS regulations at 7 CFR 210.2, define a "school" as operating "in a single building or complex of buildings." Therefore, schools that have always operated entirely virtually and do not normally operate in a school building would not meet the definition of a school for the purpose of the program and cannot be a site under SSO.

**7. Can a school with a current school nutrition contract put their contract on hold and operate as a site under another SFAs SSO contract for SY 2021-22?**

No. In efforts to "get back to normal," SFAs with a current school nutrition contract are required to operate their own contract, as usual.

**8. Can a non-participating school that does not have a current school nutrition contract be added as a site on another SFAs SSO contract?**

Yes. An SFA with a current school nutrition contract and operating SSO may add a nonprofit school outside of their district, as an SSO site. The sponsoring SFA would be fully responsible for ensuring that all locations that meals are provided to, are meeting SSO requirements, including training and onsite monitoring. An agreement between the sponsoring SFA and school being added to the Program Operations Application will be required. These sites will only be added to the Program Operations Application, not the school nutrition contract. Please contact the School Nutrition Team at [dpifns@dpi.wi.gov](mailto:dpifns@dpi.wi.gov) to discuss the details of these types of arrangements.

**9. What if we are a small private school in a Joint Agreement with the local public school? Do we still need to be prepared to have lunch open to the public?**

It depends on how you elect to operate. All schools operating as an open site must provide free meals to all children 18 and under in the community. If schools have concerns about providing meals to all community children, they may operate as a:

- Closed enrolled site and only feed enrolled students
- 'Restricted Open' site. Under a restricted open site, they could provide meals to the non-enrolled children of their school families only.

**10. May an SFA operate SSO at some schools and operate NSLP/SBP at other schools? ([SP 16-2021, Q7](#))**

There is no Federal requirement that SFAs must operate only one child nutrition program in all schools within the SFA. However, in Wisconsin, all sites in an SFA must operate the same child nutrition program because there are operational impediments that prevent DPI from permitting more than one program per SFA. The exception to this is that the ASP could be operated under NSLP, while breakfast and lunch operate under SSO.

**11. My SFA usually participates in the Community Eligibility Provision (CEP) for NSLP and SBP. How does participation in the SSO for the 2021-22 SY affect our CEP status?**

SFAs that usually participate in CEP continue to be recognized as CEP schools throughout the 2021-22 SY and have the school year counted as a year in their four year CEP cycle regardless of whether they operate SSO or NSLP/SBP. Please refer to question #1 in USDA memo [SP 18-2021](#) for additional details on CEP cycle years.

Though CEP schools normally serve free lunch and breakfast to all of their enrolled students, participation in the SSO for 2021-22 SY provides several advantages. Additional reimbursements are available under the SSO since all meals served are reimbursed at the higher SFSP meal rates instead of applying CEP free and paid claiming percentages and using NSLP and SBP reimbursement rates. The SSO also allows for additional flexibilities and supports safer meal service.

Schools that are currently approved to participate in CEP must submit an Intent to Participate form for 2021-22 SY even if they will participate in the SSO instead of NSLP/SBP. Additionally, schools not currently approved for CEP can still apply for CEP for the 2021-22 SY even if they will participate in the SSO instead of NSLP/SBP.

Most of the requirements for CEP schools operating SSO are the same as CEP schools operating NSLP/SBP. The [CEP Calendar of Requirements](#) has been updated with SSO information. The claiming process is slightly different for CEP schools operating SSO, but the claiming process is still completed monthly by site for each meal type via the online services portal. The CEP claiming percentages are updated manually by DPI to ensure that CEP schools are reimbursed the correct rate for all meals served through SSO. Please refer to the [SSO claiming manual](#) for specific directions on claiming SSO meals as a CEP site.

For more information regarding CEP for the 2021-22 SY, please refer to USDA memo [SP 18-2021](#). Specific CEP questions can be sent to [dpi.cep@dpi.wi.gov](mailto:dpi.cep@dpi.wi.gov).

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## ***Meal Pattern***

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**12. What meal pattern must be followed for the SSO?**

SFAs operating under the SSO will continue to follow the [NSLP and SBP Meal Patterns](#) (located under menu planning tools heading), as applicable. SFAs operating the SSO and continuing to provide the ASP must follow the [NSLP ASP Meal Pattern](#).

**13. Are there any meal pattern flexibilities available for SY 2021-22?**

Yes, the [COVID-19: Child Nutrition Response #90](#) allows SFAs the flexibility to serve meals that do not meet meal pattern requirements. The following flexibilities may be requested for SY 2021-22: dietary specification for sodium, whole grain-rich requirements for K-12 and preschool, vegetable subgroups, milk variety, serving 1% flavored milk, and offering one age/grade group meal pattern to all students. To receive these flexibilities, SFAs must submit a request by completing a [meal pattern flexibility request](#). All requests must be justified and will be approved on a case-by-case basis by a member of the SNT. Justifications for approval may include procurement or availability/supply issues, unresolvable food safety concerns, and plans to support access to nutritious meals while minimizing potential exposure to COVID-19. Requests will not be approved due to preference, student acceptance, and/or waste. If new flexibilities are needed after a prior approval, please submit an additional waiver request.

SFAs must resume normal meal pattern requirements as soon as possible. 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.

Meal pattern flexibilities approved in SY 2020-21 expire September 30, 2021. SFAs must reapply for any necessary meal pattern flexibilities for SY 2021-22. Approved waivers for SY 2021-22 are valid through June 30, 2022 after which all meal pattern requirements are reinstated.

**14. 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. Please refer to the [Menu Planning for Multiple Attendance Options](#) document for additional details and menu planning examples.

**15. If we need to provide meals to virtual students, must we also have to follow all the vegetable subgroups guidance 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, a SFA may submit a [meal pattern flexibility request](#).

**16. How do we stay within the dietary specifications (sodium, calories, saturated fat) when serving 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. SFAs that need flexibility with the sodium limits (i.e., remaining at Sodium Target 1) may apply for a [meal pattern flexibility request](#).

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

Yes. [COVID-19: Child Nutrition Response #90](#) allows one meal pattern to be served to all age/grade groups virtually and onsite, when targeted and 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 flexibility.

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 additional food to grades 9-12, such as an extra piece of fruit. An SFA may also request to serve the 9-12 meal pattern to all K-12 students.

**18. 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 [meal pattern flexibility request](#) has been submitted by a 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.

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

The [COVID-19: Child Nutrition Response #89](#) allows parents and guardians to pick up meals for all their children. The school or 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 unless the SFA has received an approved [meal pattern flexibility request](#) to serve one meal pattern to all age/grade groups.

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

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. Please note that the meal pattern flexibility waiver may only be used for **school-run** child care centers. Privately run daycares located within schools must continue to follow the infant and preschool meal pattern, regardless of if the daycare students are co-mingled with older age groups due to licensing requirements. SFAs should follow the infant and preschool meal pattern requirements whenever possible as this meal pattern best meets the needs of these children. Utilizing the K-8 meal pattern but providing smaller portion sizes for these children is not allowable.

**21. 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 (i.e., SSO) 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 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 [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,” “pre-cooked,” 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 [DPISNUSDAFoods@dpi.wi.gov](mailto:DPISNUSDAFoods@dpi.wi.gov).



**22. Will meal pattern waivers affect a program operator's responsibility to make meal modifications for participants with disabilities? ([SP 16-2021, Q48](#))**

During the public health emergency, States and program operators must still provide meal modifications for participants with disabilities. When planning a non-congregate meal service, State agencies and program operators should consider how individuals who require meal modifications will be identified and served.

**23. What if our school experiences an emergency milk supply issue? (new 9/1/21)**

If your SFA runs into an **emergency** milk supply issue (milk unexpectedly does not get delivered, the full amount does not get delivered, etc.), those meals can be served without fluid milk and still be reimbursable. For these meals to be reimbursable, SFAs **must** seek approval from the SNT within 2 business days. Documentation demonstrating the emergency fluid milk supply issue (e.g., email from supplier, etc.) must be submitted along with the request. Instructions for how to request approval and more information can be found under the milk heading on the [meal pattern components webpage](#). Please note, this request is different from the meal pattern flexibility waiver and is only to be used during emergency situations.

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### *Offer versus Serve (OVS)*

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**24. Is OVS allowed under SSO? ([SP 16-2021 Q6](#))**

Yes, OVS is allowed, but not required, under the SSO program. If a SFA chooses to utilize OVS for lunch and/or breakfast, it would follow the normal requirements in the [OVS Manual](#) and would apply regardless of the ages of children served. OVS is designed for congregate feeding and, if used in a non-congregate setting, SFAs should consider the unique service situations of each site, as well as each site's ability to follow appropriate safety measures. All required meal components or food items must be offered, and all participants must have the opportunity to select a reimbursable meal. FNS encourages SFAs that wish to use OVS to think creatively about how to implement this flexibility while ensuring that all meal service parameters are met. OVS is not intended to be a way to circumvent meal pattern requirements or eliminate specific components.

**25. Must senior high school students (grades 9-12) participate in OVS?**

Normally, senior high schools must participate in OVS at lunch. However, this requirement has been waived in order to support safe access to meals and allows for individually plated or pre-packaged meals at all grade levels. This flexibility is in effect until June 30, 2022 for schools claiming under both NSLP and SSO. To partake in this flexibility, please select "Yes, we will serve all meal components to high school students" within the [SY 2021-22 Program Operations Application](#).

**26. 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.

**27. 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 a choice at the time of meal pick up.

**28. 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.

Please note, all meals claimed under USDA child nutrition programs must meet requirements for special dietary needs, which includes non-enrolled students served in open or restricted-open sites, to receive reimbursement. Work with parents on getting the appropriate medical statement for any meal accommodations that are made outside of a reimbursable meal.

**29. If not implementing OVS and serving all items/components, 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 special dietary request 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 be made as long as the meal 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.

**30. 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/items with choices and/or the option to decline components, 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."

This flexibility should not be used to address food safety issues (i.e., transporting milk).

**31. 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?**

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. For 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](#).

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## ***Counting and Claiming under SSO***

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### **32. How are meals claimed under the SSO?**

SSO meals are claimed under the National School Lunch, School Breakfast and Afterschool Snack claiming portals, as applicable. There is no separate claiming portal for SSO. Please refer to the [COVID-19 Seamless Summer Option Claiming Manual](#) for specific instructions for submitting claims.

### **33. Do meals need to be tracked by student name, or is a total meal count acceptable for SSO?**

Meal count sheets may be used to collect total meals served by the program while operating SSO. Student names are not required to be collected. Sample meal count sheets are available on the [SSO Webpage](#).

To maintain program integrity, SFAs are encouraged to continue using their point of service software, if able to do so safely following best practices regarding COVID-19, which may ensure duplicate meals are not claimed. For meals that are served through a drive through, please post the “Parent Pick Up” State policy sign that can be found on the [SSO Webpage](#).

### **34. Our SFA has three schools located in one building. Do meals need to be claimed by the site the student is enrolled, or can we select one site to claim all meals?**

When students are attending school in person, follow your school nutrition contract and claim students by the school in which they are enrolled. This would require separate counts by school.

For meals that are served to virtual students or children in the community ages 18 and under, claim those meals at the site the meals are provided; student enrollment does not need to be collected.

### **35. Can SFAs serve all virtual/e-learning students and the community out of one location or from a location that is not where they would typically be attending? ([SP 16-2021, Q9](#))**

Yes. SFAs may choose to serve meals to virtual students and the community from the locations that best meet the needs of families. Sites not serving the community are considered restricted open sites. Sites serving all are considered open sites. SFAs must continue to have a plan for maintaining program integrity and accountability for the meals they are serving.

### **36. Our school distributes multiple meals at a time to students/parents/guardians. How are these meals claimed? Do I claim them on the date they were distributed or on the date they were planned to be consumed?**

Meals must be claimed on the date they are planned to be consumed. The [Multiple Meal Distribution Form](#) will assist you in tracking meals for correct claims.

### **37. Can meals only be provided to the households eligible for free or reduced price meals?**

No, the SSO program requirements are for meals to be available for all children 18 and under, not just students that qualify for free or reduced. Students with special needs can qualify up to age 21. This includes virtual students. Schools located in areas that are less than 50% free and reduced, and operating as an open site, should target students who qualify for free and reduced, but meals are available for all.

**38. May meals be provided to siblings who may not be in school or who do not attend school?**

Yes, if the site is approved to operate under the SSO program and operates as an open or restricted open site, all children aged 18 and under in that household may be served and claimed at the free rate.

**39. May parents or guardians pick up meals for their children, without the children being present?**

Yes. [COVID-19: Child Nutrition Response #89](#) extends the ability for parents or guardians to pick up meals at non-congregate meal sites on behalf of their children. The USDA Food and Nutrition Service (FNS) recognizes that in this public health emergency, continuing to require children to come to the meal site to pick up meals may not be practical and in keeping with the goal of providing meals while also taking appropriate safety measures. Under this waiver, Program operators providing meals in a non-congregate manner may distribute meals to a parent or guardian to take home to their children. State agencies must have a plan for ensuring that Program operators are able to maintain accountability and program integrity.

The WI State plan for ensuring accountability and program integrity includes the following:

- Maintain Accountability and Integrity: The meals are to be provided to eligible children, aged 18 years and under. Parents/Guardians are to share the name of the school each child attends when they are requesting meals, if the children are of school age.
- Communication: Post signage and update any existing communication (i.e., emails, web posting, social media) to include this information. The Parent Pick Up State Policy sign can be found on the [SSO Webpage](#).

**40. Can we serve parents and other adults in the community if they pay for the meal?**

If the SFA has the capacity to provide meals to adults, they may do so but will not be reimbursed for those meals. Adults must either pay for their meals or if you elect not to charge adults, other non-school food service funding must be used to pay for those meals.

**41. Can we provide multiple days' worth of meals at once to households?**

Yes. You may provide meals up to one week at a time. Food may be provided in a "bulk" manner if a menu is provided, which includes the specific items that were planned and prepared for specific meals. Any further preparation, food safety or portion size instructions should also be included to ensure households know what was provided for each meal. For example, a grocery bag may include all the meal components for breakfast and lunch for a 5-day period, along with the menu and instructions for households.

Considerations with serving bulk meals include: meals should be unitized (i.e. all components provided together – no offer versus serve), which could amount to quite a bit of food if there are multiple children in a family; shelf-stable items could provide ease; if milk or other items must be refrigerated, some families may not have the space to store all of that properly; and provide the option as to how many meals families may want to take the day you serve, just in case space/storage is an issue.

**42. May SFAs operating SSO in SY 2021-22 serve weekend and holiday meals through the SSO? ([SP 15-2021.08](#))**

No. Consistent with supporting a transition back to more traditional school year operations, SFAs may not provide and claim weekend or holiday meals through the SSO in SY 2021-22.

Weekend or holiday meals may be provided through the Child and Adult Care Food Program (CACFP) At-Risk Afterschool Meals Program, which is more widely available in SY 2021-22 due to the area eligibility waiver ([Nationwide Waiver #93](#)). Schools and afterschool care centers participating in CACFP At-Risk are required to serve meals and snacks in a structured and supervised environment, with an educational or enrichment activity, providing children with additional benefits along with nutritious food (7 CFR

226.17a(b)(1)(ii) and (iii)). FNS encourages schools to consider participating in CACFP At-Risk Afterschool Meals.

**43. Can meals be delivered to a student's home?**

Yes per [USDA COVID-19 SFSP and SSO Meal Delivery Q&A](#) and [SP 16-2021, Q13](#) if the SFA determines there is a need and it is logistically feasible to deliver meals directly to homes. Delivery could be completed by mail or delivery service, or hand-delivered by school staff, volunteers, community organizations, or others. Meals may be delivered for all students regardless of eligibility; however, meal distribution methods should directly target households of enrolled students who are eligible for free or reduced price meals. Please ensure this is done in a way that does not overtly disclose student eligibility.

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 SSO. Delivery costs could also be paid with nonprogram funds such as State or local funds, or private donations.

**44. What are the requirements for initiating home meal delivery for a household? ([SP 16-2021, Q14](#))**

Before delivering meals, schools must obtain written consent from the parent or guardian of eligible children to receive delivered meals. This could include email or other electronic means of consent. Additionally, schools should confirm the household's current contact information and the number of eligible children in the household to ensure the correct number of meals are delivered to the correct location. Schools must follow appropriate reporting and recordkeeping requirements and account for all meals served, as required under 7 CFR 210.15.

The National School Lunch Act (NSLA) places restrictions on the disclosure of information obtained from the eligibility process for free and reduced price meals. Schools must obtain written consent from the child's parent or guardian before releasing the household's contact information. The school must be the entity that makes the first contact about meal delivery with the household of eligible children and must notify the household if contact information will be shared with an external organization, for example, a local non-profit, that will provide meal delivery. Once the school receives written consent from the parent or guardian to release contact information, the schools may share the information with other organizations involved with meal delivery.

SFAs must ensure eligibility data is always handled appropriately by all individuals and organizations involved with meal delivery in order to safeguard household confidentiality.

**45. Does the child need to be present for home meal delivery? ([SP 16-2021, Q16](#))**

No. If the school has obtained the household's written consent to deliver meals, has verified the current address, and the meals are shelf-stable, no one needs to be present for home meal delivery. SFAs should consider State and local food safety requirements and best practices.

**46. If a household has children in multiple schools, can the schools coordinate to provide one home delivery for all children in the household? ([SP 16-2021, Q17](#))**

Yes. To the extent feasible, SFAs are encouraged to coordinate their home deliveries to make the best use of their resources.

**47. If a student brings a cold lunch, is milk free during the SSO meal service or do we still charge the milk as an ala carte item, like we usually do?**

The student may receive a free reimbursable meal under SSO, but any nonprogram food items are charged to the student as a la carte. The student with a cold lunch would be charged for the milk.

**48. 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 learning virtually, SFAs may continue to serve through the SSO. USDA has provided nationwide non-congregate, meal service time flexibility, and parent/guardian pick up waivers to allow for students to continue to be fed. Please contact [SSO@dpi.wi.gov](mailto:SSO@dpi.wi.gov) if you need to elect these waivers due to an unplanned closure.

**49. Are we required to serve meals to students who are in quarantine because they were exposed at school? We do not normally serve meals to sick kids, why would we have to now?**

SFAs that provide 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 virtually. SFAs are not required to deliver the meal and may want to consider special precautions when distributing meals to families in quarantine.

**50. What if the entire School Food Service Department must quarantine? How should meals be provided?**

SFAs are encouraged to be prepared for a possible COVID-19 outbreak that would affect the ability of your school food service staff to provide meals to students. During these times, we encourage SFAs to do everything possible to continue to make meals available for students. Consider having meals provided by another area SFA, restaurant, vendor/caterer, or hospital. Having a plan and/or agreement in place will allow for a quick response, if needed. As a reminder, meals must meet meal pattern requirements to be reimbursable and that the meal pattern waiver is available if necessary. This is essentially a way of having a continuation of operations plan (COOP). Having back-up meal options available is critical during these times.

To enter into an agreement with an emergency meals vendor, complete the [Wisconsin Template Vended Meals Agreement](#) and obtain a copy of the vendor's state restaurant or processing plant license and have it ready until you need to execute it. Contact the [DPI Procurement Contract Specialists](#) if you have any questions.

**51. 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, [COVID-19: Child Nutrition Response #88](#) 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.

**52. If we serve meals to virtual students, can we put the breakfast and lunch together in the same bag or are we required to have a certain amount of time between meals?**

Yes, [COVID-19: Child Nutrition Response #88](#) allows multiple meals to be served at one time. Under normal circumstances, meals must follow meal service time requirements, which states that breakfast must be served at or close to the beginning of the school day and lunch service must be offered between 10am and 2pm. However, FNS recognizes that 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.

**53. 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 meals and meals cannot be counted and claimed until provided to the student. If families pre-order meals and do not pick up the meals, those meals cannot be claimed for reimbursement.

**54. 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.

- 55. 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?**

Yes. When a district provides meals for future days, the intent is that the student will be learning/in attendance virtually/remotely. In good faith, the food service worker provides those meals, and the meals are claimed on the day the meal is intended to be eaten.

- 56. Can meals be provided and claimed for days that are not considered instructional days, such as cleaning days or if the school has scheduled instruction for M-Th and students have Friday off? ([SP 16-2021, Q8](#))**

No, for SY 2021-22 schools may only provide and claim meals on days that are considered instructional days. However, if students are given work to do at home on the off days and the school considers it an instructional day, meals may be offered if the non-congregate meal service, mealtime requirements, and the parent/guardian pick up waivers have been elected. As a reminder, meals may be offered through the CACFP At-Risk Afterschool Meals Program during the school year on days when schools are not in session.

- 57. There are other schools and organizations in my community serving meals through open sites under SSO. How do we avoid serving the same families?**

Maintaining integrity is very important. It is essential that all schools/organizations work together to avoid duplication of services. Communicate clearly with families of enrolled students and the public where and when meals may be picked up. If multiple SFAs within the community are participating, best practice would be to have families go to the school their children are enrolled in to receive meals for virtual students and their siblings.

- 58. Are SFAs required to provide meals or milk under the Special Milk Program or Wisconsin School Day Milk Program on snow days? What if there is virtual learning occurring on a snow day?**

It is not required to provide meals or milk under the Special Milk Program or Wisconsin School Day Milk Program on snow days, even if virtual learning is occurring. When the weather is poor enough to warrant a snow day, it may be unsafe for school food service staff to commute to work and for parents/students to pick up meals or milk. However, if weather forecasts suggest a snow day may occur, SFAs that are serving non-congregate meals could provide meals and milk ahead of time with the intention of students consuming them on the potential snow day—if it will be considered an instructional day. Please note, schools that have not elected to provide non-congregate meals could not provide meals on a snow day when students are not attending school in-person.

- 59. Are edit checks required under the SSO? ([SP 09-2017](#))**

Edit checks are not required for SSO sites. However, SFAs must ensure that meal counts match actual participation and claims reflect the number of meals served.

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## Other Programs

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**60. Can SFAs who are participating in SSO (providing breakfast and lunch), also provide a snack under NSLP Afterschool Snack Program (ASP)? ([SP 16-2021, Q20](#))**

SSO allows up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. Per [SP 01-2021, Q7](#), if breakfast and lunch are served under SSO, the snack could be claimed under NSLP. This would allow an SFA the ability to claim SSO and the ASP on the same day. If the school(s) providing meals does not currently have the ASP indicated on their NSLP contract, an update will be required. Contact [dpifns@dpi.wi.gov](mailto:dpifns@dpi.wi.gov) for more information.

Per [SP 24-2020, Q18](#), there is no waiver for the enrichment activity for ASPs. SFAs must provide an education or enrichment activity for each day the snack is provided. Enrichment activities may be offered in a virtual manner. 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 [Digital Nutrition Resources](#), including a variety of online games, books, and nutrition education activities. The ASP must continue to follow the meal pattern requirements.

Refer to the [CACFP Section](#) of this Q&A for information on serving a snack and/or supper through the CACFP At-risk Afterschool meals program.

**61. Are the Afterschool Snack area eligibility requirements waived for SY 2021-22?**

Yes, the USDA Released [COVID-19: Child Nutrition Response #93](#) waiving the ASP area eligibility requirements for SY 2021-22. This waiver allows schools serving snacks through the NSLP ASP to claim all afterschool snacks at the free NSLP ASP reimbursement rate, regardless of their location. All other program requirements apply and the [Afterschool Snack Program Meal Pattern](#) must be followed for the snack to be reimbursable.

**62. If the Afterschool Snack Program is offered as one of the two programs elected under SSO, are there any changes to program requirements? ([SP 09-2017, Q50](#)) (new 9/1/21)**

Yes. For SFAs operating Afterschool snack as one of the two programs elected under SSO, an enrichment activity is not required. The snack can be offered during the school day but must be evenly and adequately spaced between other meal service times to minimize food waste. The snack must still meet the NSLP Afterschool Snack meal pattern requirements. For SY 2021-22, snack offered under SSO will receive the higher SFSP reimbursement rate. Please note, the above guidance is not applicable for SFAs operating Afterschool Snack as the third program, which is under NSLP.

**63. Are SFAs allowed to distribute Afterschool snacks to in-person students as they leave for the day if they all have a virtual enrichment activity available to them when they get home? Are the virtual activities limited to the virtual students or can all students (in-person, hybrid, and virtual) participate in a virtual enrichment activity? (new 9/1/21)**

Yes, per [USDA Memorandum SP 24-2020](#), if the SFA has elected the non-congregate and parent pick-up waivers, enrichment activities may be conducted virtually or in other non-congregate ways. Offering a virtual enrichment activity that is available to all students would comply with the requirement to provide an education or enrichment activity and snacks may be distributed to in-person students as they leave for the day.

**64. For CACFP At-risk Afterschool Programs and NSLP ASP, if the educational or enrichment activity is electronic and a child does not have access to the required electronic device, is the activity still considered available to all? ([SP 04-2021, Q3](#))**



As program operators begin to plan enrichment activities for participating children, FNS encourages them to consider the ability of children to access various activities. It may be appropriate to offer some activities that children could participate in without internet access or electronic devices, such as books, activity packets, or coloring sheets.

USDA Team Nutrition offers a variety of games, books, and nutrition education activities for children through the [Digital Nutrition Resources for Kids Webpage](#). Although children are not required to participate in or complete an activity in order to receive an afterschool meal or snack, whatever activities are offered should include options that are accessible to all participating children.

**65. Can the Wisconsin School Day Milk Program (WSDMP) be operated with SSO?**

Yes. This is a State program and it may continue to be operated with SSO. To operate this program, this program must be indicated on the school nutrition contract as “in program”. All WSDMP program requirements still apply.

**66. Does the WSDMP fall under any of the Federal waivers? Do all students get free milk if the SFA is operating the SSO?**

No. The WSDMP is a State-funded program regulated by State statute, not USDA. The WSDMP program regulations still apply and only students in preschool through fifth grade who qualify for free or reduced price meals through Direct Certification or the Free and Reduced Meal Application may receive milk at no charge. Students that do not qualify are still charged for their milk.

**67. Does the WSDMP have to be served to virtual students?**

The Wisconsin State Statute requires milk to be served each day school is in session for all eligible students. There is no waiver for the State Statutes that govern the WSDMP for SY 2021-22. Therefore, all students enrolled in the school operating the WSDMP must be offered milk, including virtual students. Milks do not need to be delivered, but parents must have the opportunity to pick up milk if they choose.

For SY 2021-22, SFAs are allowed to serve milk to eligible 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](#).

**68. What if the school building is closed due a snow day, but it is still considered an instructional day due to students transitioning to learning virtually, is milk still required to be offered under the WSDMP?**

When the weather is poor enough to warrant a snow day, it may be unsafe for school food service staff to commute to work and for parents/students to pick up milk. Therefore, milk does not have to be offered on a snow day. However, if weather forecasts suggest a snow day may occur, SFAs could provide milk ahead of time with the intention of students consuming it on the potential snow day.

**69. Can the Special Milk Program (SMP) operate when schools are operating under SSO?**

Students that do not have access to breakfast or lunch under SSO may participate in SMP. Please note, this may have changed due to virtual meal pick up options, since 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.

If your SFA is interested in serving milk to virtual students or in non-congregate manner, the DPI SNT has submitted a request to USDA to waive SMP requirements that milk be served and consumed on-site and to allow parent pick up for SY 2021-22 for virtual students. We are awaiting USDA’s response.

**70. Can 1% flavored milk be served and claimed in the Special Milk Program?**

No. Milk served in the SMP must now follow the meal pattern requirements of the 2012 Final Rule due to the *2018 Final Rule, Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements* being vacated. There is no meal pattern waiver available to serve 1% flavored milk in the SMP.

Allowable milk types in the SMP now include: 1 year of age: unflavored whole milk; 2-5 years of age (not yet in kindergarten): unflavored low-fat (1%) or fat-free (skim) milk; and 5 years of age (in kindergarten and older): unflavored low-fat (1%) milk or flavored or unflavored fat-free (skim) milk.

**71. May an elementary school operate the Fresh Fruit and Vegetable program (FFVP) if they are operating the SSO in SY 2021-22? ([SP 15-2021, Q27](#))**

Yes. During SY 2021-22, elementary schools that are operating SSO may also provide FFVP foods.

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

Yes. USDA approved Wisconsin's waiver request to allow SFAs participating in FFVP to offer FFVP foods from elementary schools closed due to COVID-19 at sites operating during school building closures associated with COVID-19. This flexibility is in place until June 30, 2022.

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

If FFVP foods are distributed via a SSO open site, FFVP foods may be provided to any children attending the site. When children are receiving the FFVP snack in school, the FFVP foods should only be given to elementary students attending an elementary school that was awarded the grant. More information can be found in [SP-19 2021](#).

**74. May parents pick up FFVP for their students during school closures related to COVID-19?**

Yes. USDA approved Wisconsin's waiver request to allow SFAs participating in FFVP to distribute FFVP foods to a parent or guardian to take home to their children during non-congregate meal services due to COVID-19. This flexibility is in place until June 30, 2022.

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## ***USDA Foods and Procurement***

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**75. Who do we contact with USDA Foods questions?**

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

**76. 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 [DPISNUSDAFoods@dpi.wi.gov](mailto:DPISNUSDAFoods@dpi.wi.gov) to discuss options.

**77. Will serving fewer meals in SY 2019-20 and SY 2020-21 affect future USDA Foods entitlement dollars?**

Pursuant to section 2202(a) of the [Families First Coronavirus Response Act \(FFCRA\) Opt-In Waiver for School Year 2020-2021 National School Lunch Program USDA Foods Entitlement Calculations](#), 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 Wisconsin 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.

**78. We are operating the SSO for SY 2021-22. Can we utilize our USDA Foods (brown box finished products, direct diversion pounds, and State processed products) earned under the NSLP, to prepare meals for the SSO?**

Yes. USDA Foods earned under the NSLP can be used to prepare meals for the SSO, or any other Child Nutrition Program (CNP) meal like the CACFP, SBP, ASP, SFSP, and even a la carte food sold to children. Per § 7 CFR 250.59(b), the SFA must use donated foods, as much as is practical, in the lunches served to school children, for which they receive an established per-meal value of donated food assistance each school year. However, the SFA may also use donated foods in other activities of the nonprofit school food service. The SFA should ensure all entitlement received accrues to the benefit of the USDA child nutrition programs, regardless of individual program participation.

**79. 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

**80. For managing inventory, are we going to be able to carry over pounds later than the new July 1, 2021, since we were not able to use as much as we could have in spring due to the COVID-19 pandemic?**

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

**81. What is the carryover deadline?**

There is no carryover for USDA Foods Programs. Please refer to the current [Inventory Carryover and Sweep Policy](#).

**82. 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](#). Consider utilizing the [WI USDA DPI Transfer Documentation Form](#) to keep records.

**83. If I elect to donate my USDA Foods, are there charges associated with it?**

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.

**84. 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 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 [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 [DPISNUSDAFoods@dpi.wi.gov](mailto:DPISNUSDAFoods@dpi.wi.gov).

**85. 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, zip top bags, foam cups with lids, or even banana leaves, which 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 guidance on Emergency Procurement.

**Emergency Procurement Guidance** 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. SFAs must maintain records of this type of procurement. 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 record:

- 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

**86. How many bids do we need to put in for milk?**

At least two bids are required, three are recommended.

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## **Food Safety**

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**87. Does SSO have different food safety inspection requirements than NSLP?**

No, these requirements are the same. Schools are required to obtain a minimum of two food safety inspections during the year; sites participating in more than one child nutrition program are not required to obtain more than these two food safety inspections per school year if the nutrition programs offered use the same facilities for the production and service of meals. With SSO, there is no requirement for the SFA to obtain an additional food safety inspection.

**88. What documentation must an SFA have if they are unable to obtain a food safety inspection during the COVID-19 emergency?**

Per [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 AR to show compliance with this requirement.

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

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

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

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) 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. It is recommended to contact the local regulatory authority or sanitarian with any specific questions regarding salad bars or other self-service areas.

**91. Are SFAs 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. Please refer to the section “Developing a Plan” in the [UW-Extension Breakfast in the Classroom Toolkit](#) when considering serving meals in classrooms.

If you have not served meals in the classroom previously, a standard operating procedure (SOP) is required as part of your food safety plan.

**92. What is the guidance for sneeze guards?**

The [DPI Interim COVID-19 Cafeterias and Food Service Guidance](#) 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 plexiglass barrier in front of work service workers and cashiers.”

**93. How do we keep students socially 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 frequently 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.

**94. 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.

**95. Do home-delivered meals need to be shelf-stable? ([SP 16-2021 Q15](#))**

No. The type of meal offered will depend on the resources and capacity of the site. SFAs that are able to prepare ready-to-eat meals and have the capacity to deliver meals daily in a way that meets State or local



food safety requirements may do so. Home-delivered meals must meet all meal pattern requirements unless the school has been approved to operate under the applicable nationwide meal pattern waiver.

**96. 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 both are 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 are responsible for plating all meals.

**97. Some 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.

**98. 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 TCS foods must be kept at 41 degrees or lower and hot TCS foods must be maintained at 135 degrees or above.

**99. If we are serving meals in the cafeteria, do we need to utilize plexiglass barriers?**

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

**100. 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.

**101. Can a school accept food donations and utilize them as part of a reimbursable meal?**

Schools may accept and use donated food from other schools that participate in the USDA CNPs 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 CNPs 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 [sntfoodsafety@dpi.wi.gov](mailto:sntfoodsafety@dpi.wi.gov) with further questions.

**102. 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 credit in the NSLP/SBP meal pattern when cooked. Further, the [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 or cooking
- Ensure that only minimal preparation is required, and that food is not provided as ingredients for recipes that require chopping, mixing, baking, etc.

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## ***Child and Adult Care Food Program (CACFP)***

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*\*For DPI's CACFP COVID-19 Information visit [CACFP COVID-19 Information](#).*

**103. Can an SFA that participates in both SSO and CACFP At-Risk provide meals and snacks through SSO and At-Risk to each participant? Do the Programs have to be operated at the same site or different sites? Can participants pick up multiple meals at once?**

An SFA, if approved to operate both SSO and CACFP At-Risk, can operate at the same or at different sites. The SFA may allow children to pick up multiple meals from each Program at one time. For CACFP, the SFA must apply for the [Offsite Meals](#) waivers. However, the maximum number of meals that may be offered to each child may not exceed the number of meals allowed by each Program. Under SSO, up to two meals or one meal and one snack, per child, per day, in any combination except lunch and supper, are allowed. Under CACFP At-Risk, up to one snack and one meal per child per day are allowed. If the SFA is operating both Programs at the same site and all the meals for both Programs are picked up at the same time, each Program must keep accurate meal counts and claim only the meals served for that specific Program.

The State agency may approve a plan that includes pick-up of meals for multiple days, up to one week at a time.

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

Yes. At-Risk programs providing non-congregate meals must apply for the [Offsite Meals](#) waivers and 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 to receive an afterschool meal or snack, the afterschool care center must offer the activity.

When meals are served using the [Offsite Meals](#) 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 [Digital Nutrition Resources](#) offers a variety of online games, books, and nutrition education activities.

**105. For CACFP At-Risk Afterschool Programs and NSLP Afterschool Snacks, if the educational or enrichment activity is electronic and a child does not have access to the required electronic device, is the activity still considered available to all?**

As Program operators plan enrichment activities for participating children, FNS encourages them to consider the ability of children to access various activities. It may be appropriate to offer some activities that children could participate in without internet access or electronic devices, such as books, activity packets, or coloring sheets. USDA Team Nutrition offers a variety of games, books, and nutrition education activities for children through the [Digital Nutrition Resources for Kids](#). Although children are not required to participate in or complete an activity to receive an afterschool meal or snack, whatever activities are offered should include options that are accessible to all participating children.

**106. May CACFP At-Risk centers providing extended care during the day (both school hours and afterschool hours) claim reimbursement for a breakfast and/or lunch served in addition to the one meal and one snack allowed for at-risk?**

No. Centers that are only approved to operate under the CACFP At-Risk component may not claim reimbursement for meals that exceed their program meal limitation of one meal and one snack per child, per day. CACFP child care centers that operate a separate daytime child care and At-Risk afterschool program may be approved to claim reimbursement for up to two meals and one snack, or one meal and two snacks, per child, per day. This applies to children who attend just the daytime child care or attend both programs. For children that attend both programs, the center must ensure duplicate meals are not claimed. CACFP At-Risk centers that wish to also operate a licensed child care program should contact their State agency for guidance.

**107. 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 physically 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.

**108. May children that are unable to attend a child care center or family day care home due to a closure participate in SSO sites operating through June 30, 2022?**

Yes, if the meal feeding site is operating as an open site. Open sites may feed all children ages 18 and under.

**109. May school age children who attend a child care center or family day care home during virtual school time participate in SSO?**

It depends. If the child care center is not providing and claiming meals for those children through the CACFP then meals are available from open SSO sites for children and youth in your household 18 years old and younger.

If the child care site is providing meals and claiming them through the CACFP then the children should not be supplied the same meals through the SSO. This is considered “double claiming” of meals within the CNPs. For DPI’s CACFP COVID-19 Information visit [CACFP COVID-19 Information](#).

#### **110. Can SSO sites provide meals to child care centers?**

It depends on whether the child care center operates CACFP or not. The SFA must ask if the child care center normally claims meals or snacks in the CACFP. If the child care center participates in the CACFP, the child care center must continue to participate in CACFP and cannot receive meals under SSO.

If the child care center does not participate in CACFP and is licensed, the SFA operating the SSO may provide meals to the child care center, if they have the capacity to do so, but this is not required. If your SFA is interested in providing and claiming meals for a child care center under SSO, contact the SSO Specialists at [SSO@dpi.wi.gov](mailto:SSO@dpi.wi.gov) to discuss further.

To provide meals to a child care center, the following requirements must be met:

- The sponsoring SFA is fully responsible for the program being provided at the child care center.
- Complete an agreement between the child care center and SFA detailing the meals to be provided and any special dietary accommodations. The agreement should identify the dates the SFA will not be able to provide meals when the SFA is closed such as winter and spring breaks. The child care center will be responsible for providing meals on those days and these meals cannot be claimed for reimbursement. The SNT is working on a template agreement.
- The child care center must become a site within the SFA’s Program Operations Application for SSO. Contact [SSO@dpi.wi.gov](mailto:SSO@dpi.wi.gov) to have the child care added as a site to the application. These sites will not be added to the online school nutrition contract, as they are not part of the SFA.
- The SFA will need to inform the child care center receiving meals that they are required to inform households with children enrolled in care about the child care center’s participation in the SSO and confirm that enrolled children are not receiving meals from another SSO site.
- **All** children enrolled in the child care center must have access to the meals provided through SSO, including infants. This may require the SFA providing meals to provide infant formula and/or other age-appropriate foods to include all enrolled children. The SFA providing meals will need to work closely with the child care provider to know the ages and number of children to serve. The child care center cannot take responsibility for feeding the infants/younger children when meals are served to the older children under SSO.
- Ensure all meals served to the child care center meet the [Infant and Preschool Meal Pattern](#) requirements for all participants, including infants, and provide accommodations for children with special dietary needs who attend the center.
- The sponsoring SFA is responsible for ensuring the child care center is adhering to all SSO requirements including; taking an accurate point of service meal count, training staff on program requirements, calling ahead to order meals, meeting civil rights requirements including posting the And Justice for All poster, completing civil rights training, and the SFA must include this site as part of the [Onsite Monitoring Requirements](#).

#### **111. Can SSO sites provide meals to family day care homes (in-home child care)?**

If an in-home childcare provider wants to pick up meals from an open meal service location for all children in their care, before providing meals, the SFA should ensure the following occurs:

The SFA must ask the in-home child care provider if they participate in the Child and Adult Care Food Program (CACFP) AND contact DPI at [CNT@dpi.wi.gov](mailto:CNT@dpi.wi.gov) with the name and address of the provider. If the in-home child care provider participates in the CACFP, they are not eligible for meals under SSO, they need to continue to operate and claim under their CACFP contract.

If the in-home child care provider does not participate in CACFP:

- The SFA must work with the provider to obtain a one-time consent from the parents/guardians of their enrolled children to accept the meals on behalf of their household, for the children in the provider's care. The households must be reminded that they should not be picking up meals from another SSO site. Below is an example of a one-time consent statement that could be collected by the child care provider.

*I give my child care provider permission to accept meals through the federally funded Seamless Summer Option on the behalf of my child(ren). I understand that I should not pick up meals from another site participating in this program for my child(ren) receiving these meals through the child care provider.*

- Meals provided by the SFA to a licensed in-home child care must meet the Infant and Preschool Meal Pattern requirements for all participants, including infants and provide accommodations for children with special dietary needs who attend the center.
- The SFA and child care provider will need to discuss a feeding plan in the event the SFA cannot provide meals during a certain time, such as closures due to COVID-19 or during planned breaks, such as spring break.
- The in-home child care does not become a site on the SFA's Program Operation Application and meals are claimed at the site the meals are provided.
- It is the responsibility of the in-home child care provider to ensure all licensing requirements are met.

#### **112. Can the meal pattern flexibility waiver be used in any scenario to waive infant and preschool (CACFP) meal pattern requirements?**

The [Infant and Preschool Meal Pattern](#) must be provided by all licensed child care centers (per child care licensing regulation). The child care center may request a waiver of the infant and preschool meal pattern from their licensor but there is no guarantee that this will be approved. As the SFA is claiming these meals and receiving Federal funds, the SFA is responsible for ensuring the meals meet infant and preschool meal pattern requirements. The USDA meal pattern flexibility waiver may not be used to waive the infant and preschool meal pattern in licensed child care.

The only time the CACFP meal pattern may be waived is when a school-operated daycare, which is exempt from holding a child care license, co-mingles the daycare students with older students at meal service time.

#### **113. How do we claim meals provided to a child care center under SSO?**

A point of service meal count must be taken onsite when the children eat the meals. Taking a meal count when the center picks up the meals from an open SSO site **cannot be used to claim meals**. The SFA and child care center should develop a process for returning meal counts to the SFA for claiming. The meal counts can then be added to the counts for the location at which the meals were picked up/delivered from and claimed according to the procedures in the [SSO Claiming Manual](#).

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## ***Administrative Reviews and Reporting Requirements***

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#### **114. Will Administrative Reviews (ARs) be scheduled in SY 2021-22 for SFAs operating SSO?**

Yes. Normally, ARs are designed and intended for agencies operating the NSLP/SBP only. On April 20, 2021, the USDA [COVID-19: Child Nutrition Response #97](#) established a waiver of certain school meal programs AR criteria in order to ensure that State agencies are able to conduct administrative reviews when SFAs are only operating the SSO in SY 2021-22. USDA provided flexibility that these ARs can be [Conducted Offsite](#), if

needed, for COVID-19, up through 30 days after the end of the public health emergency. Ensuring program integrity through SSO ARs during SY 2021-22 is an important component of making sure that children are receiving healthy meals with appropriate safety measures. More information to come on ARs for SY 2021-22.

**115. What reporting requirements will there be?**

Each State agency (SA) that elects to be subject to the USDA COVID-19 waivers must submit a report to the USDA not later than 1 year after the COVID-19 waivers were elected. As a result of this requirement, the DPI SNT has already been requesting some information on waiver elections by SFAs. The SA may request additional information needed for USDA reporting, including a summary of the use of the COVID-19 waivers, and a description of whether the waivers resulted in improved services to children.

**116. Since we are operating SSO, how should we proceed with completing the FNS-10, Paid Lunch Price Report (PLP), the Verification process and report, and the PI-1441 (civil rights self-monitoring) reporting requirements?**

The [Paid Lunch Price Report](#) and [FNS-10 Report](#) instruction manuals include guidance on how to complete these reports for SFAs operating SSO. These manuals are also located on the SNT [Reporting Webpage](#). As a reminder, these reports must be submitted to be able to submit the October claim.

**117. What are the Civil Rights Self-Monitoring Requirements (PI-1441) for SY 2021-22?**

SFAs operating the SSO in SY 2021-22 are required to complete the annual [Civil Rights Compliance Self-Evaluation \(i.e. PI-1441 form\)](#). This form is to ensure all civil rights requirements are met or to self-identify if there are any areas of concern that need to be corrected. This form is due by October 31, annually. The completed form is not submitted to the State agency, but is requested as part of an AR. When completing sections of the form that ask about race/ethnicity and free and reduced price meal applications, use the most current information available.

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## ***Financial Management***

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**118. Is there a specific food service accounting project code to use while operating SSO?**

No. Meals provided under the SSO are claimed and reported under existing programs, such as NSLP or SBP.

**119. 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.

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

Yes, if 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.

**121. What funding is available for meal delivery? ([SP 16-2021, Q18](#))**

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 SSO. Delivery costs could also be paid with nonprogram funds such as State or local funds, or private donations. Additional funding to help cover these costs may be available through the Elementary and Secondary School Emergency Relief (ESSER) Grant Program. For more details visit the [ESSER Grants Webpage](#).

**122. 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 SFAs choose to use this rate but may set whatever rate they choose as long as it is approved by the district in writing.

**123. Can students receive extra items at no charge, such as an extra entree or extra milk under SSO?**

Students can receive a free reimbursable meal under SSO that meets the meal pattern requirements. Any additional items the student receives must be charged as a la carte to the student.

**124. May schools operating SSO during the school year sell a la carte food items and beverages?**

Yes, per [SP 01-2021, Q6](#) and [SP 16-2021, Q4](#), schools operating SSO may sell a la carte foods and beverages, as long as they continue to meet the [Smart Snacks Requirements](#). Foods and beverages sold in competition with reimbursable meals on the school campus during the school day must meet the Smart Snacks standards described in 7 CFR 210.11, regardless of whether the school is operating NSLP/SBP or SSO. Schools that are operating grab and go sites in areas outside of the school campus or providing meals before or after the official school day, are not required to meet the competitive food standards for those areas and conditions.

**125. What are schools thinking about for a la carte sales or extras? For some schools this generates much needed revenue, but from a budget standpoint this could 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. A la carte foods must meet Smart Snacks requirements and be priced to meet the nonprogram foods revenue rule.

**126. How will State agencies calculate eligibility for severe need breakfast funding in SY 2022-23 for schools operating SFSP/SSO in SY 2020-2021? ([SP 05-2021, Q5](#))**

Schools that do not have adequate student eligibility data for SY 2020-21 due to their participation in SSO may demonstrate to the State agency that they qualify for severe need reimbursement using claims data from SY 2019-2020, SY 2021-22, or SY 2022-23. Schools should use the data they determine most accurately reflects their free and reduced price eligibility percentage. Consistent with existing policy for new schools, as outlined in [SP 23-2005](#), schools that opt to use SY 2022-23 data may qualify for severe need funding if they serve at least 40 percent of their lunches free or at a reduced price for the first three claims of SY 2022-23. Severe need reimbursements to these schools will have retroactive effect, encompassing the three months that were used to establish the school's eligibility in SY 2022-23.

**127. A household does not want to receive free meals and insists on paying, can we charge them?**

The SSO regulations do not allow students to be charged for meals. If a household would like to pay for their meal, they may do so as a donation. The donation can be received into the foodservice account (Fund 50 for public schools, Source 291, Gifts).

**128. What are the reimbursement rates for SSO in SY 2021-22?**



The [USDA COVID-19: Child Nutrition Response #86](#) allows SFAs to claim SSO meals and snacks at the higher SFSP reimbursement rates in SY 2021-22. The SFSP reimbursement rates will provide additional funding to offset the costs associated with providing a safe meal service. SFAs have reported increased operational costs during the pandemic, including hazard pay, personal protective equipment, meal delivery costs, and packaging costs for individually wrapped, grab-and-go meals. This waiver is effective July 1, 2021 and remains in effect through June 30, 2022. Please note, the SFSP reimbursement rates are established on the calendar year and will change beginning January 1, 2022.

**SFSP Reimbursement Rates for use in SSO SY 2021-22 (valid through 12/31/2021)**

Breakfast	\$2.4625
Lunch or Supper	\$4.3175
Snack	\$1.0200

- 129. Under Child Nutrition Response #86: Nationwide Waiver to Allow Summer Food Service Program Reimbursement Rates in School Year 2021-22, SFAs may claim SSO meals and snacks at the SFSP free rate. Does this mean SFAs may claim breakfast, lunch, and snack at the SFSP rate each day meals are served? ([SP 15-2021, Q15](#))**

No, [COVID-19: Child Nutrition Response #86](#) does not change the maximum number of meals that can be served through SSO each day. SFAs participating in SSO may serve and claim up to two meals, or one meal and one snack, per child, per day, in any combination except lunch and supper. For example, an SFA could choose to serve breakfast and lunch, breakfast and snack, or lunch and snack. For SY 2021-22, the meals and snacks an SFA opts to serve through SSO may be claimed at the SFSP reimbursement rates in SY 2021-22. Meals or snacks served through other child nutrition programs would be claimed at the appropriate program reimbursement rate. For example, if an SFA also serves suppers through the CACFP At-risk Afterschool Program, the suppers would be claimed at the CACFP reimbursement rate for suppers.

- 130. May SFAs operating SSO during SY 2021-22 and earning SFSP reimbursement rates also receive additional reimbursement amounts tied to NSLP/SBP operations, including the NSLP 7 cents performance-based reimbursement and 2 cents differential, and SBP severe need payments? ([SP 15-2021, Q16](#))**

No. These additional payments are specifically tied to the receipt of NSLP/SBP base reimbursement rates and may not be paid to SFAs receiving the higher SFSP reimbursements during SY 2021-22.

- 131. Will schools operating SSO with SFSP rates in SY 2021-22 be eligible to receive State matching funds as described in Section 7 of the National School Lunch Act and at 7 CFR 210.17? ([SP 15-2021, Q17](#))**

Yes. Schools operating SSO in SY 2021-22 are eligible to receive State matching funds. Section 7(b) of the NSLA states that funds must be distributed equitably among local NSLP operators to the extent the State deems practicable. LEAs electing to operate the SSO meet this definition, as SSO operations are encompassed under the NSLP regardless of the reimbursement rate paid.

- 132. 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 nonprofit school foodservice account.

- 133. May child nutrition program operators that have received a loan through the Paycheck Protection Program (PPP), made available through the Small Business Administration and qualified lending partners, use SFSP or CACFP Program funds received from the State (child nutrition program Federal funds) to pay back a PPP loan? ([SP 05-2021, Q10](#) and [SP 16-2021, Q2](#))**



Congress authorized the PPP through the CARES Act and Consolidated Appropriations Act, 2021 to help businesses facing extenuating circumstances due to the COVID-19 pandemic to cover their payroll expenses. Some sponsors have used PPP funds to pay for child nutrition program labor expenses.

Under certain circumstances, a PPP loan may be forgiven.

- **If the PPP loan is forgiven:** Any child nutrition program expenses paid for using those forgiven PPP funds may not be claimed using child nutrition program funds since they have *already* been paid with another source of Federal funding.
- **If the PPP loan is not forgiven:** child nutrition program funds may only be used to repay that portion of the loan which was used to cover allowable child nutrition program expenses. This is consistent with existing guidance outlined in FNS Instruction 796-2 Rev. 4 (refer to heading titled *Costs Funded From Other Sources and Under Recovery of Costs*). Program operators using child nutrition program funds to repay any portion of a PPP loan must fully document such repayments, be able to demonstrate that funds were properly allocated, and that such repayments were limited to the portion of the loan that was used to cover allowable expenses under the child nutrition programs. In most circumstances, FNS anticipates that the same payroll cost allocation used by the program operator under normal procedures will continue to apply when considering PPP repayments, though exceptions may occur.

However, please note that interest due in connection with a PPP or other loan repayment is not an allowable cost and may not be paid using Federal child nutrition program funds, per requirements at 2 CFR 200.449(a). Program operators are further reminded that child nutrition program funds may only be used to pay for allowable child nutrition program expenses. For any portion of a PPP loan that was used to pay for nonprogram expenses, child nutrition program funds may not be used for repayment.

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## SFA Waivers

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### 134. What waivers are available for schools operating the SSO for SY 2021-22?

- #84 - [Child Nutrition Waiver Update for SY 2021-22](#) 4/20/21
- #85 - [Seamless Summer Option \(SSO\) Through SY 2021-22](#) 4/20/21
- #86 - [Allow Summer Food Service Program Reimbursement Rates in SY 2021-22](#) 4/20/21
- #87 - [Non-Congregate Meal Service for SY 2021-22](#) 4/20/21
- #88 - [Meal Times Requirements for SY 2021-22](#) 4/20/21
- #89 - [Parents and Guardians to Pick Up Meals for Children for SY 2021-22](#) 4/20/21
- #90 - [Specific School Meal Pattern Flexibility for SY 2021-22](#) 4/20/21
- #92 - [Offer Versus Serve Flexibility for Senior High Schools in SY 2021-22](#) 4/20/21
- #93 - [Area Eligibility in the Afterschool Programs and for Family Day Care Home Providers in SY 2021-22](#) 4/20/21
- #94 - [Onsite Monitoring Requirements in the School Meal Programs - Revised - EXTENSION 3](#) 4/20/21

### 135. What waivers do schools operating the SSO need to complete for SY 2021-22?

SFAs have indicated whether they will utilize the following waivers in the SY 2021-22 Program Operations Application:

- Onsite Monitoring Requirement
- Offer Versus Serve Flexibility for High School Seniors
- Meal Service Time Requirement
- Non-Congregate Meal Service
- Parents and Guardians to Pick Up Meals

**136. What if I already indicated ‘No’ to a waiver included in the SY 2021-22 Program Operations Application, but now I need it?**

Schools may elect to use a waiver after the school year has begun if needed. Email [SSO@dpi.wi.gov](mailto:SSO@dpi.wi.gov) and let us know you would now like to use a waiver.

**137. Are we correct in understanding that based on question #11 in USDA Memorandum SP 25-2020 that the ability to choose congregate feeding vs non-congregate feeding can now go to the meal level?**

Yes, schools may choose to offer certain meals as non-congregate, and others as congregate as outlined in [SP 25-2020, Q11](#). For example: A school may choose to offer breakfast as a non-congregate meal, and lunch as a congregate meal. However, any non-congregate meal must be:

- 1) the same type for all enrolled students, **and**
- 2) made available to all enrolled students whether they attend in-person or virtually.

Keep in mind that if the school is offering meals through SSO as an open site, the school must make meals available to all children who attend the site (not just enrolled students).

**138. Does the Meal Service Time waiver apply to students who are learning in person or just virtually? Can the Meal Service Time waiver be utilized in a congregate setting? Or is it strictly for non-congregate feeding?**

[COVID-19: Child Nutrition Response #88](#) can be used in the congregate feeding setting as long as it is justified to support safer access to nutritious meals. For example, this flexibility is provided if school start times have changed due to COVID-19, and SFAs need to adjust their meal service times to allow for streamlined access to meals. If the SFA has also elected to use the non-congregate feeding waiver, they may offer meal pickup for student learning virtually outside of the standard 10:00am – 2:00pm lunch times.

**139. The Meal Service Time waiver talks about distribution of meals through pick-up schedules or delivery plans with designated times for distribution. Does the Meal Service Time waiver allow SFAs to do a second chance breakfast after lunch?**

No. [COVID-19: Child Nutrition Response #88](#) waives the requirement 220.8(l) that schools must offer breakfasts meeting the requirements of this section at or near the beginning of the school day. The intention of this waiver is not to serve a second chance breakfast after lunch and the waiver should be used to support safer access to nutritious meals.

**140. Do I need to request a waiver for the sodium flexibility?**

If a SFA would like flexibility in meeting the dietary specifications of the sodium target (i.e., remain at Sodium Target 1), yes; complete a meal pattern flexibility request, available late summer 2021. Since many schools are relying on pre-packaged and grab-and-go foods to provide safe meal service, the use of the sodium flexibility will be approved in all cases.

**141. Do I need to request a waiver to offer low-fat (1%) flavored milk?**

The flexibility to offer low-fat (1%) flavored milk **without needing to submit a flexibility request** is now effective through September 30, 2021. After this date, unless there is congressional action to provide additional flexibility, SFAs will need to apply for a meal pattern flexibility request (available late summer 2021) to offer low-fat (1%) flavored milk. More information regarding available meal pattern flexibilities can be found under the [Meal Pattern Section](#) of this Q&A. As a reminder, there is no waiver available for 1% flavored milk in the Special Milk Program.

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

Yes. SFAs need to know and understand what meals are served to their students. Therefore, each SFA is responsible for filling out the [meal pattern](#) flexibility request, available late summer 2021 and receiving approval from a member of the SNT. The SFA providing the meals can work with the joint schools to complete the waiver; however, the joint school should submit their own waiver.

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## *Free and Reduced Price Meal Eligibility and Verification*

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**143. If a school operates under the SSO, should the school continue to collect and process household applications for free and reduced price school meals? ([SP 15-2021, Q29](#))**

Yes. SFAs must make the USDA Free and Reduced Price Meal application available to households, as usual, to certify children for free and reduced price meal eligibility status. A student's free and reduced priced meal eligibility is not required for free school meals in SSO, but establishes eligibility for other benefits, such as State reporting, Wisconsin School Day Milk Program and P-EBT. SFAs that collected household applications prior to October 1, 2021, are required to conduct verification, as usual.

**144. Our district depends on accurate free and reduced data for state reporting and funding purposes, such as Title 1. How will we be able to get this information under SSO?**

When operating SSO, each SFA needs to continue to run Direct Certification and distribute Free and Reduced Price Meal applications to households to collect this information. The [2021-22 Application Materials](#) and template letters have been updated to include information on SSO and why applying is still important for the household and school district but does not impact a household's ability to receive a free meal.

In addition, the Department of Education has developed a Fact Sheet to support school districts in determining alternate methods of allocating Title I funds when school meal data is unavailable. FNS encourages LEAs to consider the options outlined in the Fact Sheet for data purposes that are unrelated to school meal or P-EBT eligibility. For example, the options outlined in the Fact Sheet may be used to determine which schools qualify for additional State and local funding based on need. The Fact Sheet can be found on the [FNS Website](#).

**145. Is the Public Release required to be sent out by schools participating in the SSO?**

Yes. USDA has provided recent guidance [SP 15-2021](#) for the upcoming school year regarding the public notification for meals under the SSO. Schools operating SSO must provide public notification regarding the availability of school meals and the eligibility criteria at or near the beginning of the school year, as provided in 7 CFR 245.5.3 For SY 2021-22, schools participating in SSO should notify households that all meals will be offered free through SSO. The 2021-22 Public Release is updated on the [DPI SNT Webpage](#) to include the SSO information.

**146. Can a student's eligibility from SY 2019-20 or 2020-21 roll over into SY 2021-22? What if the household has submitted a new application or matched on a DC run for SY 2021-22 that will change their eligibility from SY 2019-20 or 2020-21? What eligibility should the student receive?**

When determining a student's eligibility for SY 2021-22, the most current eligibility determination applies, which may be from 2019-20, 2020-21 or 2021-22. The 30-day carryover has been paused since SY 2019-20 due to COVID-19. Any applications received and processed in SY 2021-22 and/or Direct Certification runs completed in SY 2021-22 will override the most current eligibility status for that student. Please note, an "N" code from Direct Certification is not considered a new eligibility determination and does not override the current eligibility status. If a Free and Reduced Meal Application is submitted and once processed indicates

the student is no longer eligible for free or reduced, their status would be changed to paid on your benefit issuance list.

As a reminder, under SSO, all students receive a free meal regardless of their eligibility status, but the benefit issuance list should reflect the most current individual student eligibility for other program purposes, PEBT and state reporting.

**147. If our SFA is operating SSO, are we still required to continue Direct Certification activities? ([SP 04-2021, Q11](#) and [SP 16-2021, Q22](#))**

Yes, all SFAs must continue to conduct Direct Certification a minimum of three times during SY 2021-22. This will be especially important for State reporting and qualifying students for P-EBT benefits.

**148. Are “sharing of information forms” required to be completed for SY 2021-22?**

Yes. If your SFA offers households the ability to have local fees waived, such as sports, band, and testing fees, based on free or reduced eligibility, a new “sharing of information form” is required annually. More information on sharing of information is located on the [Free and Reduced Meal Eligibility Webpage](#).

**149. Is verification required if our SFA is operating SSO for SY 2021-22?**

Yes. Per [SP 15-2021, Q30](#), SFAs that collect household applications in SY 2021-22 are required to conduct verification, regardless of the reason the applications were collected and/or the Child Nutrition Program they are operating. The sample size used to conduct verification activities must be based on the number of approved applications on file as of October 1, 2021.

The outcome of verification will not impact a student’s ability to be provided a meal at no charge. Since school meal applications are used to establish eligibility for P-EBT, State reporting and Wisconsin School Day Milk Program, verification is still necessary and required.

If your SFA did not receive any USDA Free and Reduced-Price Meal Applications as of October 1, 2021, the verification process is not required, but the Verification Collection Report (VCR) does still need to be submitted. To submit the VCR, complete sections 1-3, section 4 will be all zeros to show no applications were on file as of October 1 and since your SFA is exempt from the verification process, mark 5-1 for section 5 and submit.

More information on verification is located on the [Verification Webpage](#).

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## ***General Program Areas***

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**150. What are the SFA Onsite Monitoring Requirements for SY 2021-22?**

Onsite monitoring is a self-assessment of the counting and claiming system and general areas to ensure program integrity and accountability. Onsite monitoring is required for all SFAs with more than one school site operating the NSLP, SBP, or SSO.

The onsite monitoring waiver under the [COVID-19: Child Nutrition Response #94](#) waives the requirement that onsite monitoring elements of 7 CFR 210.8, 210.16(a), 210.18, 220.7, 220.8(h), and 220.11(d) must be completed onsite. The waiver provides the authority to conduct these reviews offsite, if needed. **The waiver does not waive the SFA monitoring requirement.** SFAs and SAs should continue their monitoring activities offsite if they are not conducting onsite reviews. The option to elect this waiver was

included in the Program Operations Application; no further action is required. Per [SP 10-2021, Q12](#), all other onsite monitoring requirements are still in effect, including the requirement to complete onsite monitoring by February 1. Please note, this waiver is in effect until 30 days after the end of the public health emergency, declared by the United States Department of Health and Human Services. If the public health emergency is lifted within the school year, SFAs will need to transition to onsite monitoring.

An [SSO Onsite Monitoring Form](#) is available to better align with program operations under SSO. This form can be used for both breakfast and lunch monitoring. USDA has created [Offsite Monitoring Fact Sheets for Child Nutrition Programs](#) for additional guidance and best practices. More Information can be found on the [Onsite Monitoring Webpage](#).

**151. Is the Nondiscrimination Statement required on informational materials and websites? ([SP 16-2021, Q47](#))**

States are not relieved of their obligation to include the required Nondiscrimination Statement (NDS) on all printed and electronic program materials made available to applicants, participants, and potentially eligible persons for public information, public education, or public distribution. This includes, but is not limited to, information pertaining to eligibility, benefits, services, the location of local facilities or service delivery points, and hours of service.

If the size of the material is too small to include the full statement, the material must, at a minimum, include the following statement in print in the same font size as the main text: "This institution is an equal opportunity provider." On websites, the Nondiscrimination Statement (NDS) or a link to it, must be included on the homepage of the program information.

Recognizing that print media (television, radio, and Internet announcements) are generally short in duration, the full NDS must be provided to the media outlet but does not need to be read or printed in its entirety. The single line, short NDS is sufficient to meet the requirement. Additionally, for programs that include a funding statement at the conclusion of the announcement, it is allowable for the short NDS to follow the funding statement. For example, "Pennsylvania WIC is funded by the USDA. This institution is an equal opportunity provider."

**152. Do you need to have "And Justice for All" (AJFA) posters on mobile routes for COVID-19 meal distribution? ([SP 16-2021, Q49](#))**

The AJFA poster must be prominently displayed in all facilities and locations that distribute Program benefits or administer services. Due to COVID-19, if printed AJFA posters are not available for display, paper copies may be substituted as necessary, including use of the 2015 AJFA poster, if new (2019) posters have not been received. 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.

**153. For SY 2021-22, some schools are considering providing meals in the classroom rather than the cafeteria. In those situations, do the schools need to display an "And Justice for All" (AJFA) poster in every classroom? ([SP 16-2021, Q50](#))**

No. It is not feasible or cost-effective to require that each classroom in a school display an AJFA poster. Instead, schools can display posters in prominent locations throughout the school, such as a bulletin board in the main building entrance, the school office, or another area frequently visited by parents/guardians and children. Schools may copy posters and put one in each classroom, but that is not required.

**154. Are schools required to provide potable water to students eating lunch at school when lunch is served in the classroom? ([SP 16-2021, Q10](#))**

Yes. Schools are generally required to make potable water available to students during meal service times where meals are served, including in the classroom (7 CFR 210.10(a)(1)(i)). Although lunch is not typically

served in the classroom, due to COVID-19, many schools are considering serving lunch in the classroom to accommodate social distancing. During the COVID-19 pandemic, when lunch is served in the classroom, the potable water requirement does apply. The Afterschool Snack program falls under NSLP and requires potable water when this program is operated in a school or community building.

**155. Are schools required to provide potable water to students eating breakfast at school when breakfast is served in the classroom? ([SP 16-2021, Q11](#))**

No. Consistent with SBP regulations for potable water (7 CFR 220.8(a)(1)) while water must be made available when breakfast is served in the cafeteria, schools are not required to make water available when breakfast is served outside of the cafeteria. Schools are encouraged to make potable water available in all meal service locations as safety permits.

**156. Are schools required to provide potable water to students who are learning virtually due to COVID-19 and who are not eating lunch at school? ([SP 12-2021, Q12](#))**

No. The requirement that schools make potable water available to students where lunch is served during the meal service assumes that lunch will be consumed onsite. During the COVID-19 pandemic, when lunch is consumed outside of the school (i.e., provided via meal delivery, picked up by parents or guardians, etc.), students would not be able to consume the potable water at the onsite location even if it were offered. Accordingly, the potable water requirement does not apply. As noted above, the requirement to provide potable water with school breakfast only applies when breakfast is served in the cafeteria (7 CFR 220.8(a)(1)).

**157. Are States required to provide free language assistance? ([SP 16-2021, Q51](#))**

During this public health emergency, States are not relieved of their obligation to ensure meaningful access to services for limited English proficient (LEP) persons. This includes both providing interpretation services and translating critical documents. More guidance can be found in the [Guidance to Federal Financial Assistance Recipients Regarding the Title VI Prohibition Against National Origin Discrimination Affecting Persons with Limited English Proficiency](#).

**158. While operating the SSO in SY 2021-22, is a Local Wellness Policy (LWP) needed?**

Yes. While operating the SSO in SY 2021-22, the requirement that all SFAs comply with the final LWP rule still applies. The LWP requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). It requires each SFA participating in the NSLP and/or SBP to develop a wellness policy. The final rule expanded the requirements to strengthen policies and increase transparency. SFAs were required to be compliant with the final rule by June 30, 2017. See the [LWP Webpage](#) for more information.

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## *Miscellaneous*

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**159. May an SFA participating in SSO during SY 2021-22 apply for and receive a FY 2021 NSLP Equipment Assistance Grant?**

Any SFA with a previously approved State agency agreement on file to operate the NSLP (per 7 CFR 210.9(b)), and that would otherwise be operating NSLP in SY 2021-2022, may continue to access NSLP Equipment Assistance Grants.



**160. To the extent that the waivers granted by USDA affect programs in the Elementary and Secondary Education Act of 1965 (ESEA) administered by the U.S. Department of Education (ED), such as the Title I, Part A (Title I) program, are USDA and ED working together to provide information to stakeholders? ([SP 16-2021, Q23](#))**

Yes. Similar to prior instances when there have been changes to the school meals program (e.g., the implementation of the Community Eligibility Provision) that also affect ESEA programs such as Title I, USDA and ED are coordinating on the best ways to provide timely information to stakeholders. ED has developed a [Fact Sheet](#) to support school districts in determining alternate methods of allocating Title I funds when school meal data is unavailable. USDA encourages stakeholders with questions about the waivers and ESEA programs to contact ED at [OESE.titlei-a@ed.gov](mailto:OESE.titlei-a@ed.gov).

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

No. 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](mailto:dpifns@dpi.wi.gov).

**162. Any suggestions for 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.