

Frequently Asked Questions on the Summer Food Service Program Extension Through December 2020

On August 31, 2020, USDA issued [nine waivers](#) necessary to allow schools and other summer meal sponsors to continue operation of the Summer Food Service Program (SFSP) through December 31, 2020, unless funding runs out before then. Eight of these waivers are extensions of current waivers allowing for non-congregate feeding, parent-pickup of meals and meal pattern flexibility, as well as waivers of area eligibility requirements, meal service time requirements and first week site visits. A [new waiver](#) allows for the SFSP to be utilized even when school is in session, and even for children who are present at school.

These waivers were issued very suddenly, and USDA has not yet issued additional guidance to State agencies. Vermont AOE Child Nutrition Programs has submitted many questions to USDA with the hope that these will be answered in the near future. Until further clarification is received by USDA, AOE Child Nutrition Programs is offering preliminary answers to some frequently asked questions by the field.

NEW [USDA has issued one set of Q&As that address some of these questions and provided some verbal guidance to the State agency. Responses have been updated below as a result of this guidance. Additional guidance is expected from USDA on the outstanding questions.](#)

Q1. When can we let families know that meals will be available for free to all children 18 and under at our open sites? How long should we tell them meals will be free?

As soon as the School Food Authority (SFA) has solidified plans about when and where meals will be available, you can notify families about the availability of free meals.

The USDA waiver is in effect until Dec. 31, 2020, however USDA has reserved the right to rescind the waiver if funding runs out before then. This would require Programs to switch back to NSLP prior to Dec. 31, 2020. You can tell households that meals are free “until December 31st or when funding runs out, whichever is sooner” or “Meals are free for the time being, but USDA may require us to start charging for meals part way through the school year.”

Q2. Our school isn't area eligible; do we still need to charge for meals if children aren't income eligible for free and reduced-price meals?

The USDA waivers issued on August 31, 2020, include an extension of state area eligibility waivers. This means that all Vermont schools can use the SFSP to provide free meals to all

children 18 and under, regardless of whether the site is area eligible. The SFA will need to have an approved SFSP sponsor and site application in the CNPWeb system prior to serving meals.

Q3. Should we stop collecting free and reduced meal applications? Should we process the applications we have received?

Until we receive further information from USDA, SFAs should continue to collect applications. They may be needed later in the school year if there is a need to end the SFSP. These applications may also be useful for households to access other benefits, such as reduced-price internet or reduced college application fees. SFAS should continue to process any applications received from households and send the household an approval or denial letter, following the required processing timelines.

To avoid confusion with households, SFAs should try to make it clear that the applications are not necessary to receive free meals from the SFSP currently, but they may be needed later in the school year.

If the SFA is operating the SFSP instead of the NSLP, the first 30 days of operation will not begin to accrue until the SFA switches to NSLP operation, so the 30-day carryover period will not start until the SFA begins operating the NSLP.

AOE CNP has not been provided guidance from USDA around whether verification of applications that are collected will need to be conducted on the regular timeline.

Q4. Can we use the SFSP to offer meals on weekends?

Yes, weekend meals are allowed in the SFSP. The SFA may use this program to offer meals 7 days per week, including holidays, if the SFA has capacity to do so. School does not need to be “in session” to offer meals. Programs are not required to offer weekend meals. To add weekend meals, check off the appropriate days in the SFSP site application.

Note: The mealtime waiver allows multiple days’ worth of meals to be provided at a time. Saturday and Sunday meals could be provided to children on Friday along with Friday meals, rather than offering pickup or delivery services over the weekend.

Q5. Is there any change to USDA Foods? Can we continue to use USDA Foods and DoD Fresh to prepare meals in the SFSP?

There is no change to USDA Foods. The USDA Foods and DoD Fresh funds allotted to the SFA for School Year 20-21 are still available to the SFA and may be used to produce meals for the SFSP. Please do plan to use these foods and DoD Fresh funds.

Q6. Are the \$12 million in CRF Funds for Summer Meals still available? Can we still apply?

The legislature specifically appropriated these funds for meal service in June-August. However, not all the funds were requested for that timeframe. The AOE has recommended that the legislature allow up to \$4 million of these funds available for school year food service equipment costs. The legislature is currently considering that request. AOE will notify SFAs if these funds become available in the future.

UPDATED Q7. Can we still operate the NSLP/SBP instead of the SFSP? Can we operate the NSLP/SBP at the same time?

Use of the SFSP is optional. Schools with approved NSLP/SBP applications on file may operate the NSLP/SBP instead, however AOE does not recommend this. The SFSP has a higher per-meal reimbursement rate, a simpler meal pattern and regulations, and allows SFAs to serve meals at the free reimbursement rate to all children 18 and under. AOE recommends that all sponsors switch to the SFSP for this reason.

In Question 9 of [SP 25-2020](#), USDA indicated that an SFA may operate the SFSP at some sites, while operating the NSLP/SBP at other locations, with State agency approval. In addition, other guidance from USDA requires sponsors to ensure that children are not accessing the same meal on the same day from multiple programs. If your SFA is interested in operating SFSP for some sites and NSLP/SBP at other sites, please reach out to AOE Child Nutrition Programs with more information about why you would like to do this, and your plan for ensuring that the same children do not access the same meal on the same day from both programs.

Q8. If we started school in person, operating NSLP and then went fully remote, could we then switch to the SFSP?

Yes, however this is not recommended. We recommend starting with the SFSP due to the higher reimbursement rate, simpler regulations and simpler meal pattern. With the new waiver, SFSP can be operated even if the school is offering in-person instruction, so there is no need to operate the NSLP, unless the SFSP application has not yet been submitted and approved when meal service starts.

UPDATED Q9. Can different schools in the same district or SFA choose to participate in either SFSP or NSLP?

Yes, see the answer to Question 7, above.

Q10. Can we operate the CACFP At-Risk After School Meals Program while we operate the SFSP to offer a total of three meals and one snack per day to children?

Yes, guidance issued by USDA this spring allowed for CACFP At-Risk to be offered at the same time as the SFSP, as long as the same meals were not provided by each program. The SFA must be an approved CACFP sponsor to operate this program. A [fact sheet on the At-Risk After School Meals Program](#) and a [training webinar for program sponsors](#) are available for those interested in learning more. For more information or to initiate this process, please reach out to [Rebecca Cochran](#) with Child Nutrition Programs.

Q11. Can we operate the After School Snack Service while we operate the SFSP?

This question has been submitted to USDA. AOE CNP does not know the answer. Schools who are area eligible and interested in offering an after school snack should consider the CACFP At-Risk After School Meals Program, which is allowed to be offered while offering the SFSP (see question 8).

UPDATED Q12. Can we operate the FFVP while we operate the SFSP?

Yes. USDA has provided verbal guidance indicating that FFVP can continue to be operated using the waivers provided by USDA, even if the NSLP is not operating.

Q13. Can we request that children pre-register for meals, even though our site will be an open site?

Yes, you can request that students pre-register to receive meals. However, if you are operating as an open site, you should have meals available for children to receive meals without registering.

UPDATED Q14. What are the SFSP Reimbursement Rates?

The current reimbursement rates are as follows:

2020 SFSP Reimbursement Rates

Meal	Rural/Self-Prep, Rural/Vended, and Urban/Self-Prep	Urban/Vended
Breakfast	2.3750	2.33
Lunch/Supper	4.1525	4.0875
AM/PM Snack	.9775	.9550

While reimbursement rates are usually updated at the start of each program year, USDA has

indicated in verbal guidance that these rates will remain the same through December 31, 2021.

UPDATED Q.15 Will the Provision 2 enrollment date be extended due to this change? How will Provision 2 work this year?

For those already operating in Provision 2, the assumption is that when you resume operating NSLP, you will jump back in where you left off. For those trying to set a base year for Provision 2 this year, **we have submitted questions to USDA about how this will work. These schools attempting to set a base year will need to operate in the NSLP/SBP (see question 7), while other sites in the SFA may operate the SFSP.**

Q.16 Should we serve Pre-K children at our school under SFSP or under the CACFP?

The SFSP allows you to serve all children under the age of 18. Therefore, you can serve pre-k children with SFSP. There is the option in the SFSP to serve smaller portions using the CACFP portion sizes to children 6 years.

Per 7 CFR 225.16 (f)(2): Children under 6. The State agency may authorize the sponsor to serve food in smaller quantities than are indicated in paragraph (d) of this section to children under six years of age if the sponsor has the capability to ensure that variations in portion size are in accordance with the age levels of the children served. Sponsors wishing to serve children under one year of age shall first receive approval to do so from the State agency. In both cases, the sponsor shall follow the age-appropriate meal pattern requirements contained in the Child and Adult Care Food Program regulations (7 CFR part 226).

Sponsors wishing to do this should put a note in the Application Packet requesting it

NEW Q.17 Should we be worried about funds running out sooner than December 31, 2020?

USDA indicated to State Agencies in a call on September 9, 2020 that they believe they have plenty of funds to cover these meals, and we should not be worried about the possibility of the waivers being rescinded early due to lack of funding. In question 14 of SP 25-2020, USDA responded that “In the event FNS projects a shortage of funds prior to the expiration date of this waiver, FNS will notify all State agencies at that time that SFSP/SSO sites in non-area eligible areas will no longer be able to serve meals for Federal reimbursement. FNS will reimburse all claims for qualified meals served prior to the projected date of inadequate funds. FNS will provide advances notice, to the extent possible, in order to minimize out-of-pocket expenses for program operators.”